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Major Service Change Threshold Public Participation Summary Report

San Francisco Bay Area Rapid Transit District



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I. Introduction

Purpose

The Federal Transit Agency (FTA), as outlined in FTA Circular 4702.1A, requires BART to evaluate service and fare changes. In order to comply with 49 CFR Section 21.5(b)(a), 49 CFR Section 21.5 (b)(7) and Appendix C to 49 CFR part 21, recipients shall “evaluate significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact. For service changes, this requirement applies to “major service changes” only. The recipient should have established guidelines or threshold for what it considers a “major” change to be.”

This report describes the process BART used to establish the major service change threshold (Threshold) and documents the process for collecting public input; reports the comments and questions received; and summarizes the results of community opinion and how those opinions were considered in revising the Threshold.

San Francisco Bay Area Rapid Transit District (BART)

The San Francisco Bay Area Rapid Transit District (BART) is a rapid transit system that travels through 26 cities in San Francisco, San Mateo, Alameda and Contra Costa counties. BART’s five service lines cover 104 miles, comprising 43 stations, and serve an average weekday ridership of 340,000 passengers. BART provides discounted fares for seniors, persons with disabilities, students and qualified educational groups. Children ages 4 and under ride free.

Opened in 1972, BART is operated by the San Francisco Bay Area Rapid Transit District, which is governed by a directly-elected nine-member Board of Directors serving four year terms. The District includes three counties: Alameda, Contra Costa and San Francisco. While San Mateo County is not within the BART District, it is served by six BART stations and various BART Board members act as liaisons to the County.

Establishing a Major Service Change Threshold

To establish a threshold or “upper limit” for a service change, BART must first define these terms so they can be communicated to and discussed with the public. The term “major” relates to how BART proposes to measure its service.

In advance of soliciting community input, BART staff researched best practices from major transit agencies throughout the United States to inform its approach. The FTA Circular 4702.1A states that a numerical standard

such as a change that affects 25% of service hours of a route can serve as a dividing line between minor and major service changes. Transit agencies in New York, Houston, San Jose, Portland, Chicago, Sacramento, and Atlanta have adopted this industry standard of 25% per line.

Proposed Major Service Change Threshold

BART proposes that "Major Service Change" shall apply to:

- 1) New Lines: the establishment of a new transit line, or
- 2) Line Length: increases or decreases of more than 25 percent in the length (in revenue miles) of an existing transit line, or
- 3) Service Levels (Amount of Service Operated on a Line): increases or decreases of more than 25 percent in the annual transit revenue vehicle miles operated on a transit line, or
- 4) Service Hours (Hours of Operation): increases or decreases of more than 25 percent in the annual number of service hours scheduled on a transit line, or
- 5) Aggregate Changes Across All the Lines on the BART System: annual net increases or decreases to Line Length, Service Levels, or Service Hours which exceed 20 percent in aggregate when combined over all the lines on the BART system, or
- 6) Cumulative Changes Within a Three Year Period: net increases or decreases to Line Length, annual Service Levels, and annual Service Hours on a transit line which exceed 25 percent cumulatively within a three year period.

"Major Service Changes" shall exclude any changes to service which are caused by:

- 1) Temporary Services: the discontinuance of a temporary or demonstration service change which has been in effect for less than 180 days, or
- 2) New Line "Break-In" Period: an adjustment to service levels for new transit lines which have been in revenue service for less than 1 year (allowing BART to respond to actual ridership levels observed on those new transit lines), or
- 3) Other Agencies: acts of other governmental agencies, or
- 4) Forces of Nature: forces of nature such as earthquakes and wildfires, or
- 5) Competing Infrastructure Failures: failures of competing infrastructure like bridges, tunnels, or highways, or
- 6) Overlapping Services: a reduction in transit revenue vehicle miles on one line which is offset equally by an increase in transit revenue vehicle miles on the overlapping section of another line where there is a timed-transfer station at the intersection point of the two lines. (An overlapping section is where 2 or more lines share the same track and stations).

II. Process for Soliciting Public Comment

Consistent with BART's Public Participation Plan completed in May 2010, BART conducted outreach and hosted 18 multi-lingual community meetings throughout its service region to solicit feedback from the public. For those unable to attend the community meetings, BART conducted an online survey hosted on the BART website at www.bart.gov.

BART conducted outreach for the meetings using a variety of methods including:

- CBO Newsletters and Communications
- Targeted e-mails
- Targeted phone calls
- BART website, including applications and social networking sites
- Bay Area Media, both print and online
- Ethnic Media
- Flyer distribution at BART Stations
- Flyer placement on BART Car Seats
- Flyer posting within the community

The following is a complete list of the meetings conducted. Meetings were held at a variety of times and locations to accommodate a wide range of participants. Translated materials and interpretive services were available for all meetings.

Location	Address	Date and Time	Translation Services Requested
San Francisco - Chinatown	Chinatown Community Dev. Ctr. 663 Clay Street, SF	Tuesday, June 8 11:30 a.m.-1:00 p.m.	Cantonese
Oakland	Lao Family Community Ctr., 2325 E. 12th St, Oakland	Thursday, June 10 4:00-5:30 p.m.	<i>None requested</i>
Hayward	City Hall, Room 2A, 777 B St, Hayward	Monday, June 14 6:30-8:00 p.m.	<i>None requested</i>
Dublin	Dublin Public Library, 200 Civic Plaza, Dublin	Monday, June 14 6:30-8:00 p.m.	<i>None requested</i>
San Francisco	SF Senior Center, 481 O'Farrell St, SF	Tuesday, June 15 1:00-2:30 p.m.	Cantonese, Mandarin, Spanish

Location	Address	Date and Time	Translation Services Requested
Oakland	Claridge Hotel - Ballroom, 634 15th St, Oakland	Tuesday, June 15 6:30-8:00 p.m.	<i>None requested</i>
Pittsburg	Senior Center, 300 Presidio Lane, Pittsburg	Tuesday, June 15 6:30-8:00 p.m.	Cantonese
San Francisco - Excelsior	Excelsior Family Connections, 49 Ocean Avenue, SF	Wednesday, June 16 10:00-11:30 a.m.	Cantonese, Spanish
Oakland	Youth Uprising, 8711 Macarthur Blvd., Oakland	Wednesday, June 16 5:00-6:30 p.m.	<i>None requested</i>
Concord	El Rancho Restaurant, 1450 Monument Blvd., Concord	Wednesday, June 16 6:30-8:00 p.m.	<i>None requested</i>
Richmond	Nevin Center, 598 Nevin Avenue, Richmond	Thursday, June 17 4:00-5:30 p.m.	<i>None requested</i>
San Francisco - Bayview	Bayview YMCA, 1601 Lane Street, SF	Thursday, June 17 6:30-8:00 p.m.	<i>None requested</i>
Union City	Community Center, 1333 Decoto Road, Union City	Thursday, June 17 6:30-8:00 p.m.	<i>None requested</i>
San Francisco - Mission	Chavita's #2, 3161 24th St, SF	Monday, June 21 6:30-8:00 p.m.	Spanish
Lafayette	Veterans' Memorial Bldg., 3780 Mt. Diablo Blvd., Lafayette	Monday, June 21 6:30-8:00 p.m.	<i>None requested</i>
South San Francisco	Municipal Service Bldg., 33 Arroyo Drive, So. SF	Monday, June 21 6:30-8:00 p.m.	<i>None requested</i>
Berkeley	So. Berkeley Senior Ctr, 2939 Ellis St., Berkeley	Tuesday, June 22 6:30-8:00 p.m.	<i>None requested</i>
San Pablo	City Hall - Maple Hall, 13831 San Pablo Ave., San Pablo	Wednesday, June 23 6:30-8:00 p.m.	<i>None requested</i>

At each meeting, participants were asked to sign in and were provided a copy of the agenda and survey. BART staff opened the meeting with welcoming remarks and introduced the presenters. They also recognized CBO partners who assisted with the meeting. BART staff briefly reviewed the agenda and meeting purpose, followed by a presentation which focused on explaining key terms and describing BART's proposed Threshold and how it would be measured and applied.

BART staff explained how a major service change is defined and the definition and need for an established Threshold. The Threshold for a major service change would be applied and measured based on:

- The addition of a new line;
- Length of a transit line;
- Service levels of a line; and
- Service hours on a line.

BART staff then described how the 25% Threshold would be applied on an annual basis. Cumulative changes within a three year period in Line Length, Service Levels, and Service Hours would also have a Threshold of 25%. For example, if BART were to reduce a Line's Service Levels by 20% a year over each of 2 years, that 40% cumulative reduction would be considered a "Major Service Change."

BART's proposal also includes a more stringent annual Threshold of 20% when there are combined changes across all BART lines in Line Length, Service Levels, and Service Hours.

BART's proposal includes six exclusions for service changes. BART staff explained the exclusions and why they are needed. These exclusions are:

- Temporary services in place for less than 180 days
- Changes in the first year of service on a new line
- Changes in response to actions of other agencies (e.g., Caltrans)
- Changes in response to forces of nature (e.g., earthquakes)
- Changes in response to failures of competing infrastructure (e.g., Bay Bridge)
- Changes to rationalize overlapping services

They also explained what BART must do when a service change exceeds the Threshold.

Following the presentation, the presenters opened the meeting for questions and comments. A graphic recorder took notes and recorded comments and questions on large scale wallgraphic paper. In several meetings, the BART

presenters worked closely with interpreters who translated the proceedings. All comments received verbally or in writing in languages other than English were translated and transcribed and included in the comments. Below is a summary of the key questions and comments received at the 18 meetings.

III. Public Comments

Comments on Threshold Level

Meeting participants asked a variety of questions regarding the Threshold level and the impact studies to be carried out when it is determined that a service change exceeds the Threshold. They were curious to know how the 25% Threshold was determined, and how other agencies arrived at the use of this figure. There were also concerns expressed about how needed studies would delay necessary service changes, as well as the cost of the studies and how they would be funded. There were also questions asked regarding the timeframe and who would conduct the studies.

The major concern expressed by several participants was a belief that the 25% Threshold based on Line Length, Service Levels and Service Hours was too simplistic and did not adequately take into account the impacts of service changes on riders. It was noted that if it takes a 25% service change to trigger a study, some impacts may be missed. While the study may satisfy FTA requirements, they did not believe it served BART's constituents well. Some participants noted that a service change might affect less than 25% of a line or service hours but would impact a considerably higher percentage of riders. A change to length of service, such as reductions in hours or schedule changes, could have a significant impact resulting in a community no longer being served. For instance, some participants suggested that a 25% reduction in length of day could eliminate service after 8:00 p.m. Another suggested example was that a 25% reduction in line length could eliminate 3 or 4 stations from the Richmond-Fremont line.

Schedule changes, even when not eliminating services, could still have a noticeable impact. Participants noted that a short extra wait could make a big difference for riders, making them late for work. Those with disabilities may have a difficult time waiting, especially when there is limited seating in a station. Riders may feel unsafe waiting during off hours when the stations are underpopulated. Several respondents suggested a lower percentage, such as 20%, would be more inclusive. Other suggestions included using alternative metrics such as considering a major service change in terms of the percentage of riders impacted, rather than miles, particularly at a station level.

Also, some participants expressed concern regarding the effectiveness or thoroughness of the studies determining the potential discriminatory effects of a service change. An example given was that if changes occur over a two-three year period and changes in the first two years result in a 20% change, a five percent change in the third year might not be adequately tracked or measured.

Finally, several participants suggested that BART communicate with and seek input on proposed service changes whether or not they exceed the Threshold. One suggestion was that for changes between ten and twenty percent, town hall meetings should be held in lieu of a more extensive outreach study.

Comments on Proposed Exclusions to Threshold

Exclusion for Temporary Services and the First Year of Service

No comments were made during the meetings regarding the proposed exclusions for temporary services and for changes in service during the first year of a new line, but several comments were submitted via the written surveys and are summarized in the "Survey" section.

Exclusion for the Actions of Other Agencies

Meeting participants asked whether the exclusion for the actions of other agencies would apply to a change in cost of services made by another agency, which nonetheless would affect the cost of travel via BART.

Exclusion for Forces of Nature

Meeting participants inquired how "forces of nature" would be defined.

Exclusion for Failures of Competing Infrastructure

No comments were made during the meetings addressing the exclusion for failures of competing infrastructure.

Exclusion for Overlapping Services

Several participants expressed concern about the exclusion for overlapping services, and felt it should be eliminated. These participants observed that the timed transfers stipulated under this exclusion are a hardship and inconvenience to passengers in wheelchairs or with bicycles.

BART received additional explanation regarding participant concerns in the survey responses, which are described in the next section.

Comments on Public Participation Process

Meeting participants made a number of comments on the effectiveness of the public participation process. They were glad to see that BART was continuing to conduct public involvement activities, and would like to see more regularly scheduled opportunities to provide input. Participants felt it is important to reach out to diverse populations, particularly youth, low income, and minorities, and to conduct bilingual outreach for those with limited proficiency in English. Numerous community-based organizations were suggested as outreach partners who could assist in reaching these communities. Some participants noted that meetings must be conveniently scheduled and well publicized. Care must be taken to ensure that everyone at the meeting can hear and understand explanations of BART policy. Another suggestion was to provide clear information at stations and on the BART website. Finally, participants requested that BART be responsive to community input, and that the Board be provided with all opinions expressed.

A complete database of public comments received at the community meetings is included as Appendix A to this report.

The meetings combined discussion of the Threshold with another topic, a proposed temporary fare decrease. Much of the discussion at the meetings focused on the proposed fare decrease or an alternative use of the funds. Meeting participants also took the opportunity to share their issues and concerns with BART on a variety of topics. Issues raised included the cost of fares; the availability of discounts or subsidies for seniors, students, families, the disabled and economically disadvantaged, etc.; service improvements such as increases in hours or line extensions; and improvements to and maintenance of stations and trains.

Survey

Following the question and comment period, participants were asked to complete a brief survey. Translated copies of the survey were available in several languages, including: Chinese, Khmer, Korean, Lao, Russian, Spanish, Tagalog, and Vietnamese.

The survey, which also covered the proposed temporary fare decrease, included four questions related to the Threshold. Meeting participants were asked to provide feedback on how well they felt BART staff explained the Threshold and for their opinion on whether the 25% Threshold is fair, too high or too low and whether each of the six exclusions were reasonable or if they should be eliminated. The survey also provided space for written comments. A total of 195 surveys were completed at the community

meetings. A complete summary of the printed survey results is included as Appendix B.

Question 1: Did You Hear the Full Presentation?

Since the topic was complex, and a respondent's understanding of the topic would likely benefit from hearing the explanation provided by BART staff, the first question on the print survey asked whether meeting participants had heard the full presentation on the Threshold. Seventy-three percent of respondents had done so, and an additional twenty-two percent heard at least part of it. A few respondents missed the presentation, were unsure or failed to answer the question.

Question 2: How Well Do You Feel BART Staff Explained the Threshold?

Next, the survey asked participants how well they felt BART staff had explained the Threshold. About eighty-nine percent responded that they felt BART staff explained the Threshold fairly well or well, with all or most of their questions answered. Less than ten percent of survey respondents described the explanation as poor, leaving them unclear on some points. It was noted that the translation provided was appreciated and suggested that pictures or slides would have been helpful as well.

Question 3: Opinion of 25% Threshold for Service Changes

The third question on the survey solicited participants' opinions on whether the Threshold should be set at 25% as a dividing line between minor and major service changes. About a quarter of respondents felt that 25% was too high. The remaining seventy-four percent thought that the Threshold was either a fair level (38%), too low (6%), did not know as the presentation was unclear to them (5%), or had no opinion (25%).

Respondents who thought that 25% is a fair level appeared satisfied with BART's explanation of the Threshold. Those who felt that a 25% Threshold is too high echoed the concerns expressed by participants in the meetings that it would not adequately take impacts of service changes on riders into account. One suggestion was to set different levels for different criteria, including ten percent for a change in hours of service, and zero for any change in length of the line – respondents felt that BART must do a study of impacts in those cases.

Question 4: Responses Regarding Exclusions to Threshold

The final question on the survey regarding the Threshold asked about the six types of service changes that would be excluded from the Threshold. Respondents were asked whether they found all six exclusions to be reasonable, or whether they thought some of them should be eliminated.

Forty-three percent responded that all six exclusions are reasonable. However, smaller percentages of survey respondents expressed interest in eliminating each of the six exclusions.

Survey Responses: Exclusion for Temporary Services

Eleven percent supported eliminating the exclusion for temporary services. Respondents commented that 180 days is too high a number to use to define “temporary service” as an exception.

Survey Responses: Exclusion for the First Year of Service

Although only eight percent responded that the exclusion for the first year of service should be eliminated, it drew the most commentary of any of the exclusions. Respondents suggested that the period should be shortened to six months, 90 days (possibly with the exclusion of temporary services lasting 180 days), or to even as little as 30 days. The question was asked as to when a study would be done if it wasn’t conducted during the first year.

Survey Responses: Exclusion for the Actions of Other Agencies

Eleven percent wanted to eliminate the exclusion for the actions of other agencies. It was noted that this should be well defined, as it seems that it could provide an opportunity for BART to avoid doing a necessary study.

Survey Responses: Exclusion for Forces of Nature

Only three percent of respondents felt that the exclusion for forces of nature should be eliminated, and no further comment was made.

Survey Responses: Exclusion for Failures of Competing Infrastructure

Seven percent voted to eliminate the exclusion for failures of competing infrastructure, but made no further comment.

Survey Responses: Exclusion for Overlapping Services

Seventeen percent of respondents thought that the exclusion for overlapping services should be eliminated. It was noted that this exclusion was problematic because trains are crowded at peak times with the disabled, bikers, and riders (with luggage) trying to get to San Francisco Airport, and coverage is needed. Respondents also commented that service changes proposed in response to overlapping services should be studied at a lower threshold than 25%, particularly if a station closing is involved. It was expressed that it is necessary to do studies in all such cases in order to assess the change’s effect on the elderly and handicapped.

Eighteen percent of respondents replied that they had no opinion regarding the exclusions. Eight percent of respondents found the presentation unclear and they did not know how to respond to the question.

Web Survey

A modified version of the survey (which omitted questions related to the presentation) was available online at www.bart.gov to allow input from participants unable to attend the community meetings. Twitter users received a "tweet" on the availability of the survey and were encouraged to respond. BART reviewed the survey results by source (print copy distributed at community meeting versus online survey).

177 surveys were submitted online. Safeguards were in place to ensure that only one survey response could be submitted per respondent but since there was no other data collected as to the source or the opportunity, these respondents had to review information on the Threshold. These results were not considered to be statistically valid and were not combined with results from the print survey. However, these responses were a useful source of additional input and are listed below.

- Thirty-one percent of web survey respondents felt that the 25% Threshold was a fair level.
- Forty-two percent thought the 25% Threshold was too high.
- Four percent expressed that the 25% Threshold was too low.
- Sixteen percent did not know, having found the online presentation of the concepts unclear.
- Seven percent responded that they had no opinion.

Regarding the six proposed exclusions to the Threshold:

- Thirty-two percent of web survey respondents found all six exclusions to be reasonable.
- Fourteen percent voted to eliminate the exclusion for temporary services.
- The exclusions for first year of service and actions of other agencies each received a twenty percent vote for elimination.
- Ten percent of respondents wanted to eliminate the exclusion for forces of nature.
- Ten percent voted to eliminate the exclusion for failures of competing infrastructure.
- Twenty-five percent wished to eliminate the exclusion for overlapping services.
- Fourteen percent found the online presentation unclear and did not know their opinion.
- Six percent indicated that they had no opinion.

Other Comments Received

BART's outreach efforts were successful at attracting interest from online media to promote the workshops, and most online media allows readers to comment. This section reports the results of feedback received online between June 8, 2010 and June 23, 2010.

Only one online comment was specific to the Threshold or public participation process. The commenter agreed with many meeting participants that a percentage basis is not an appropriate determinant of service change impacts. The commenter further suggested that a major service change should be defined based on the type of service change, including scheduled hours or frequency of trains and destinations or stops along lines.

BART also received comments sent directly to staff or Directors via email and Twitter. These comments largely addressed a proposed temporary fare decrease rather than the Threshold and closely echoed input already received in the community meetings.

IV. Revisions to the Threshold in Response to Public Comments

BART has revised its Major Service Change Threshold to respond to the comments received at the 18 public participation meetings. As you will be able to reference in the "Community Comments" section of this report, only 26% of those surveyed at these meetings thought the proposed BART Threshold was too high. The 74% balance thought it was "reasonable", "too low," something they had "no opinion" about, or were "unclear".

Many of those participants who expressed the opinion that the Threshold was too high were concerned that it allowed BART to close an individual station entirely without having to conduct a service equity analysis. To respond to this concern BART has amended Threshold Item 4 to read that a "major service change" shall apply to:

- **Service Hours (Hours of Operation):** increases or decreases of more than 25 percent in the annual number of service hours scheduled on a transit line or at an individual station.

As far as the six exclusions to the Threshold are concerned, only 31% of those surveyed thought that they needed to be revised or eliminated. The 69% balance thought that they were "reasonable," something they had "no opinion" about, or were unclear.

Given that the one exclusion which generated the most responses (17%) in favor of its elimination was that for overlapping services, BART has narrowed its definition significantly. These community meeting participants expressed that having to make a timed transfer was not equivalent to having direct service to their destination. BART has, therefore, revised the overlapping services exclusion to apply only to situations where passengers have an alternative line available to them, as follows:

- **Overlapping Services:** a reduction in transit revenue vehicle miles on one line which is offset by an increase in transit revenue vehicle miles on the overlapping section of an alternative line (an overlapping section is where 2 or more lines share the same track and stations).

A copy of this report will be provided to the BART Board of Directors and posted on the BART website at www.bart.gov.