

April 9, 2012

Mr. Steve Heminger
Executive Director
Metropolitan Transportation Commission
101 8th Street
Oakland, CA 94607

Dear Mr. Heminger:

We are writing with respect to the Metropolitan Transportation Commission's (MTC) Transit Sustainability Project (TSP) Recommendations and proposed Resolution No. 4060. We commend MTC for the process they developed and implemented to reach this juncture. MTC was inclusive and listened as evidenced by the evolution in the recommendations from their initial incarnation to the current proposal. As the General Managers of the large transit operations, we offer our collective suggestions for consideration.

Thematically, we have some reservations about the targeted 5 percent reduction in costs in that it may not be achievable or it may incent agencies to take actions contrary to our core missions. However, we recognize the value in setting a target that challenges the region, and we appreciate your willingness to understand our challenges and potential solutions. Therefore, we suggest that operators be allowed to demonstrate good faith efforts performed to achieve the reduction target if the target is not met and offer valid and reasonable explanations as to why the target was not met.

However, we respectfully disagree with MTC's staff recommendation that existing and new capital and operating revenues under the Commission's Authority be considered as subject to compliance with the performance targets. We request that this recommendation be amended to reflect only new revenues. Any attempt to link existing revenue streams to the performance measures introduces untenable uncertainty to ongoing operations. For example, 5307 funds are the primary source for funding bus replacements in the region. The prospect of losing access to these funds due to missing a performance metric is problematic from the standpoint of maintaining existing levels of transit service. Additionally, we have all programmed the use of these funds in our budgets.

The standardization of fare policies is also an area of concern. Specifically, a one-size fits all approach to local fares and to paratransit fares for trips that exceed ADA requirements ignores the rich diversity and different needs and desires of the various communities that comprise our metropolitan area. The Bay Area is not a homogenous place, so the desire for standardization needs to be tempered with an appreciation of local challenges and needs. Fare policies are generally targeted toward what works for riders within a geographical subarea of our region, within the context of social and political goals. We are, however, open to a regional pass that incorporates the fare structure of all operators and does not financially harm an individual operator using Clipper® as long as MTC is willing to absorb the costs of implementation.

The recommendation that we integrate scheduling software is overly simplistic and cumbersome, akin to a debate over Macs versus PCs or iPhones versus Android phones. We support improved coordination of schedules, and believe that this can be achieved through a commitment to coordination and follow-up meetings. With respect to software, it should not matter what software is used as long as it feeds data into Google Transit and the region's 511 system.

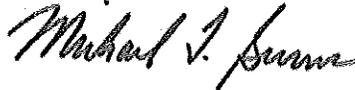
The recommendation to support transit agency operations on major corridors by requiring local jurisdictions to consider transit operating speeds and reliability in projects affecting those corridors is excellent. We support this recommendation, but seek to have it expanded to explicitly include Caltrans and MTC alongside local jurisdictions.

Thanks for considering our suggestions. We reiterate our commitment to work collectively with MTC to provide a robust, equitable, and sustainable transit system for the Bay Area.

Sincerely,



David Armijo
General Manager
AC Transit



Michael Burns
General Manager
Santa Clara Valley Transportation
Authority



Grace Crunican
General Manager
BART



Denis Mulligan
General Manager
Golden Gate Bridge, Highway
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Michael Scanlon
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Executive Director, Caltrain