

Summary of Public Comments Received – Policy for the Implementation of Performance Based State Transit Operating Assistance

Commenter	Summary of Comments	Recommended Disposition of Comments in Policy/Guidance
Virginia Railway Express	Supportive of recommended methodology inclusive of the commuter rail sizing metrics	No change required.
Fairfax County	<p>1) Ask Department to continue analyzing ways to adequately measure different types of service, specifically how to address non-revenue (deadhead miles) for long-distance commuter routes</p> <p>2) Recommend that local contributions to transit systems be utilized as an allocation factor, as it demonstrates local investment in the benefits of transit</p> <p>3) Supports transition assistance or delay of implementation to provide additional time for local governments to identify new sources of revenue to offset proposed reductions</p> <p>4) Recommend inclusion of a requirement to certify maintenance of effort for local funding by those systems that see an increase in transit operating assistance, thus requiring that any additional funding provided be utilize to improve or expand service and not reduce local contributions</p>	<p>1) Modify Technical Guidance to reflect treatment of deadhead miles on commuter routes longer than 20 miles as revenue operations</p> <p>2) No change recommended at this time</p> <p>3) Addressed by legislation/budget language</p> <p>4) Added language in CTB resolution encouraging jurisdictions to use any increase in state resources toward sustaining and expanding service options</p>
PRTC/Omni Ride	<p>1) Recommends allowing any transit system that operates a uni-directional trip of at least 20 miles in distance to include all associated mileage of that route in consideration of revenue hours and miles – this credits systems that provide long-haul passenger services</p> <p>2) Recommends providing an additional multiplier of 2x revenue miles and hours for</p>	<p>1) Modify Technical Guidance to reflect treatment of deadhead miles on commuter routes longer than 20 miles as revenue operations</p> <p>2) No change recommended at this time</p>

	<p>systems that operate trips at 100% farebox recovery in designated HOT lane corridors</p> <p>3) Reward systems with higher farebox recovery ratios with a multiplier on ridership factors</p> <p>4) For any unallocated funds, establish a bonus performance measure tied to the development of a dedicated performance measurement program for safety, maintenance, and fiscal accountability.</p>	<p>3) No change recommended at this time</p> <p>4) Evaluation of performance measurement is required by Transit Strategic Plans and for safety and asset condition by Federal regulation. No change recommended at this time.</p>
<p>Hampton Roads Transit</p>	<p>1) Requests two years of transition funding assistance or deferral of implementation, transition funding assistance should be calculated year-over-year (FY2019 v FY2020) rather than (FY2020 old formula v FY2020 new formula)</p> <p>2) Requests any changes as a result of the public comment process be subject to further deliberation by the TSDAC before CTB action</p> <p>3) Requests clarification in the policy guidance document that TSDAC requested two years of transition assistance, DRPT recommended one</p> <p>4) Recommends basing a larger percentage of the sizing metric on total operating cost to better address the costs of doing business</p> <p>5) States that metrics incentivize certain services over others, specifically stating that increasing state operating assistance to rural providers would result in reducing 5311 federal for operating and moving that to capital, which only benefits those providers</p> <p>6) States that the current policy guidance fails to recognize the uniqueness of light rail in the same manner as it does for commuter rail</p>	<p>1) Addressed by legislation/budget language providing for one year of transition assistance.</p> <p>2) TSDAC will be briefed on March 14, prior to CTB action on March 21.</p> <p>3) Addressed by legislation/budget language providing for one year of transition assistance. Language regarding recommendations removed from technical guidance.</p> <p>4) No change recommended at this time.</p> <p>5) DRPT will evaluate the use of 5311 funds during the allocation process and will use to offset statewide capital needs.</p> <p>6) No change recommended at this time.</p>

<p>Virginia Transit Association</p>	<p>1) States that implementing new metrics with no new revenue results in agencies losing funds 2) Suggests that additional data may be necessary, there are cost differentials by region and mode, and work should continue to examine the application of the data 3) Requests two years of transition assistance</p>	<p>1) No change required. 2) The policy resolution requires DRPT to review the outcomes of process annually and revisit the metrics at least every three years. 3) Addressed by legislation/budget language for one year</p>
<p>Southern Environmental Law Center</p>	<p>1) States that implementation of performance based processes jeopardize the ability of transit providers to serve vital functions and achieve important goals without additional long-term and sustainable funding 2) Supports efforts to provide one to two years of transition assistance 3) Urges DRPT to continue to explore potential refinements to the proposed process to better account for the difference in the type and scale of services delivered by different transit providers</p>	<p>1) No change required. 2) Addressed by legislation/budget language 3) The policy resolution requires DRPT to review the outcomes of process annually and revisit the metrics at least every three years.</p>
<p>Loudoun County</p>	<p>1) States that the proposed methodology fails to recognize the needs of transit systems serving different populations and economic drivers, congestion mitigations 2) Requests delaying the proposed policy changes for at least one year</p>	<p>1) Modify Technical Guidance to reflect treatment of deadhead miles on commuter routes longer than 20 miles as revenue operations 2) Addressed by legislation/budget language</p>
<p>Greater Lynchburg Transit Company</p>	<p>1) Express concern with the implementation of the transition year methodology, which negatively impacts GLTC when they would have remained whole or seen a slight increase with the implementation of the recommended formula</p>	<p>1) Addressed by legislation/budget language.</p>

	<p>2) Requests that the CTB consider alternative measures to reduce the burden on those negatively impacted by the transition scenario</p> <p>3) Recommends comparing the FY2020 allocation under the transition scenario with what the FY2020 allocation would have been compared to the recommended methodology and offsetting that difference.</p>	<p>2) Addressed by legislation/budget language.</p> <p>3) Addressed by legislation/budget language. Recommended policy language reflects a comparison of the FY20 allocation to what the allocation would have been in FY20 under the old formula.</p>
<p>City of Lynchburg</p>	<p>1) Expresses concern regarding the negative impact of the transition methodology on systems like GLTC</p> <p>2) Recommends consideration of alternative measures to limit the negative impact of the transition years, with regard to funding that would not have otherwise been negatively impacted by the recommended formula</p>	<p>1) Addressed by legislation/budget language.</p> <p>2) Addressed by legislation/budget language. Recommended policy language reflects a comparison of the FY20 allocation to what the allocation would have been in FY20 under the old formula.</p>