

Table of Contents for Letters Received for Bus Transformation Project Draft Strategy and Recommendations

Prince George's County, Department of Public Works and Transportation	1
WMATA Accessibility Advisory Committee	3
House of Ruth	5
Virginia Department of Rail and Public Transportation	6
City of Alexandria, Department of Transportation and Environmental Services	8
Monica Backmon, Northern Virginia Transportation Authority	10
District of Columbia, Office of Planning	12
Arlington County, Department of Environmental Services	15
Chuck Steigerwald, Potomac and Rappahannock Transportation Commission (OmniRide)	20
Coalition for Smarter Growth	22
City of Fairfax	25
Fairfax County, Department of Transportation	28
Fairfax County, Department of Planning and Zoning	33
Northern Virginia Transportation Commission	38
Montgomery County, Department of Transportation	40
District of Columbia, Department of Transportation	46
Alexandria Transportation Commission	49



PRINCE GEORGE'S COUNTY GOVERNMENT

Department of Public Works and Transportation
Office of the Director



Angela D. Alsobrooks
County Executive

Terry L. Bellamy
Director

June 11, 2019

NeoNiche Strategies
c/o Bus Transformation Project
4501 Ford Ave, Suite 501
Alexandria, VA 22302

Dear Bus Transformation Project Team:

As you know, the Washington Metropolitan Area Transit Authority (WMATA) plays a vital role in our transportation network and helps provide our residents with access to jobs, educational opportunities, shopping and medical facilities through the regional Metrorail system and over 60 Metrobus lines operating within and through the County. While Metrorail provides our residents with access to the regional network, Metrobus is equally as vital to transporting residents to activity centers, jobs and places of interest in the County.

Over the years, the County absorbed service realignments to the Metrobus system in response to rising subsidy costs and County staff, in turn, worked with WMATA staff to minimize the impact on residents. While our residents adjusted, the County has and continues to believe, that additional Metrobus service is needed throughout the County, especially south of Fort Washington and Clinton.

After the announcement of the Bus Transformation Project, the County was optimistic and excited about the prospect of getting a fresh look at the system and uncovering innovative solutions to improve service options for residents through the existing Metrobus network. Our County staff and elected stakeholders articulated the need for better Metrobus service, which is user friendly, customer focused and responsive to the transportation needs in the community.

We appreciate an acknowledgment of these needs and opportunities in the draft strategies and recommendations. However, some recommendations raise concern because they dramatically alter the provision of Metrobus service in the County in ways that we did not anticipate at the beginning of the study.

Specifically, the County is concerned about absorbing 48 existing WMATA bus lines and operating them under the County's transit system. As articulated through our recently completed County transit vision plan, we have outstanding needs in our 28-route system, such as replacing our aging fleet while working to find ways to expand weekday hours and provide Saturday service. At this point, the County is no position to absorb these additional routes and a great many things would need to happen to enable that in the future.

9400 Peppercorn Place, Suite 300, Largo, Maryland 20774

(301) 883-5600

FAX (301) 883-5709

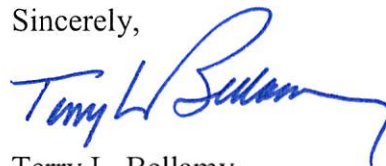
Maryland Relay 711

While very important, the Bus Transformation Project is part of a more comprehensive look at fixed route services in the County that also addresses local transit needs of our “The Bus” passengers. Therefore, as WMATA looks towards implementation, it is crucial that impacted local jurisdictions and partner agencies are fully informed about the implications and requirements to absorb new WMATA service and its impact to their existing networks. A shift of this proposed scale would likely require reconstructing the entire local bus system, finding alternative funding sources and developing a detailed education and implementation strategy. Prince George’s County will be actively engaged in ensuring that these issues are considered and solutions to them are incorporated into the rollout of the broader Bus Transformation effort.

Lastly, communication and public engagement on this project needs to be significantly enhanced. A single forum has been held in Montgomery County, which is simply not sufficient. It is not acceptable to conduct a forum in Montgomery County, where the recommendation is to shift only two routes, but not in Prince George’s County where the recommendation is to shift forty-eight. The Transformation Project Team *must* present the project in an open forum in Prince George’s County.

Our County and its staff look forward to continued dialogue with Bus Transformation Project staff as they finalize their draft strategies in the Fall and releases its final report. In the end, we hope that our residents and the region, who depend upon Metrobus services, will reap the benefits of a better transportation network. If you have any questions or concerns, please contact Deputy Director Martin Harris at (301) 883-5617, or mharris@co.pg.md.us.

Sincerely,



Terry L. Bellamy
Director

cc: Prince George’s County Council
Major F. Riddick, Jr., Acting Chief Administrative Officer, Office of the County Executive
Floyd Holt, Deputy Chief Administrative Officer, Office of the County Executive
Martin L. Harris, Deputy Director, DPW&T
D’Andrea L. Walker, Associate Director, OT, DPW&T
WMATA Board of Directors
Paul Wiedefeld, General Manager and CEO, WMATA
Regina Sullivan, Director of Government Relations, WMATA
Charlie Scott, Government Relations Officer, WMATA
Allison Davis, Director, Strategic Planning, Office of Planning, WMATA



Accessibility Advisory Committee

600 Fifth Street NW
Washington, DC 20001
202-962-6060

June 10, 2019

Dear Chair Evans and Members of the Board,

It is the pleasure of the Accessibility Advisory Committee (AAC) and the Bus and Rail Subcommittee (BRS) to present you with the report on the Bus Transformation Project (BTP).

The purpose of the BTP is to identify and implement steps that would render the Washington region's bus services into a seamless system, and thus, a world-class travel option for all current and potentially new users of public transit here.

How will the BTP achieve that? By transforming the various existing bus services into one interconnected system that would produce affordable, reliable services throughout the region. To date, three Accessibility Advisory Committee (AAC) members have participated on the BTP's Strategy Advisory Panel. Their hope has been that the Project's strategies will yield a system more useful to current riders and attractive to new riders including, of course, more people with disabilities and seniors.

During a first AAC discussion of the BTP's May 2019 Strategy Summary paper, an AAC member and a commenter from the public both noted that the Summary highlighted laudable goals but was bereft of actionable details.

Later, after attending one of three BTP "Open House" briefings, the same AAC member reported disappointment that the lengthier paper available at the event also fell short on specifics. For example, that document did map out bus deserts in the region, i.e., areas underserved by bus companies or virtually not served at all. After inquiring about when existing routes would be realigned, or new routes mapped to serve bus deserts, the member was told that such details were not expected to be specified in the BTP's September 2019 report — and possibly not even later.

Of course, a basic problem affecting the implementation of an interconnected bus service system is that the Washington region is served by nine companies involving eight separate governmental jurisdictions or entities with no coordinating system of governance.

In contrast, an example of successful interjurisdictional governance is the Port of New York and New Jersey Authority. For almost 100 years, that bi-state Authority has grown to manage effectively a train connection between the two States, tunnel and bridge connections, as well as the seaports and five airports located in those States.

Very recently, the governments of Austria, Germany, and Switzerland successfully built a governance model for public transportation at an international level. Thus, as complicated and challenging as it is to create interjurisdictional governance, there are precedents elsewhere suggesting it should be possible to do so here. The AAC is hopeful that such will eventually come about and lead to building a seamless bus system serving more riders within our Washington region.

Meanwhile, the AAC applauds the current data presented in BTP documents and strongly supports implementation of the methods presented thus far that would produce an integrated jurisdictional system and result in a growing, more inclusive, more satisfied ridership. To that end, the AAC continues to believe that the oversight of this new system is best served by a group that includes diverse bus riders of all socio-economic groups, people with disabilities, and seniors throughout the region's rural, suburban and urban areas.

Sincerely,

Philip Posner
Chair, AAC

Tino Calabia
Chair, BRS



June 5, 2019

BusTransformationProject.com
NeoNiche Strategies

To Whom It May Concern:

Thank you for inviting House of Ruth to participate in the Bus Transformation Project for D.C. and the surrounding area. As the first women's shelter in Washington, D.C., and a 43-year-old nonprofit focusing on women and children survivors of homelessness and domestic violence, transportation affordability is a key focus for House of Ruth.

The more than 1,000 clients we serve each year have already battled traumas, domestic violence, homelessness, and starting over. We provide them with safe, private housing; with counseling to strengthen their resilience; and with developmental childcare for children ages six weeks to five years. What we need YOUR help with is affordable transportation.

Lyfts, Ubers, cabs and car ownership remain unaffordable and out of reach for most of our clients. Bikes and walking is sometimes possible, but hard to do with young children. Public transportation is their only means of getting from Point A to Point B, and in D.C., there are no discounts for no-income or low-income residents on public transportation.

Of all of the good work we've seen throughout this process, the recommendation to create an affordable fare is the one that heartens us the most, and we ***strongly urge*** you to implement this as soon as possible.

The residents of D.C. can't wait much longer for this. Thank you again for allowing us to be part of the team.

Sincerely,

Sandra L. Jackson, MSW, LICSW, LCSW-C
Executive Director



COMMONWEALTH of VIRGINIA

Jennifer L. Mitchell
Director

DEPARTMENT OF RAIL AND PUBLIC TRANSPORTATION
600 EAST MAIN STREET, SUITE 2102
RICHMOND, VA 23219-2416

(804) 786-4440
FAX (804) 225-3752
Virginia Relay Center
800-828-1120 (TDD)

June 5, 2019

Bus Transformation Project Team
c/o NeoNiche Strategies
4501 Ford Avenue, Suite 501
Alexandria, Virginia 23102

The Virginia Department of Rail and Public Transportation (DRPT) appreciates the opportunity to review and provide comments on the WMATA Bus Transformation Project strategic recommendations. DRPT has participated in the Strategy and Technical Committee process throughout the study and appreciates the thoughtful consideration that the team has given to a very complex initiative.

DRPT is generally supportive of the recommendations to make the system more customer-focused, prioritizing buses on major roads, encouraging innovation, promoting efficiency, and improving accessibility to bus service. Our comments are focused in two key areas: redefining the bus network and consolidation of functions.

Redefining the Bus Network

DRPT is encouraged by the willingness to take a fresh look at the region's bus network and are supportive of the concept of a network redesign. The LaHood Study, completed in November 2017, emphasized the need for WMATA to take a hard look at the regional bus network and operations as a way to improve efficiency and service to the public. The LaHood recommendations specifically identified the need to review service on low performing routes, location of bus garages (leading to excessive deadhead mileage), route structure, changing patterns of demand, fare structure, and fare evasion patterns as areas could be examined.

However, we are concerned that the work to date appears focused on shifting routes from WMATA to local providers and lacks detailed analysis. WMATA and the Northern Virginia transit agencies (as a collective whole) have not reviewed the entire bus network on a route by route basis. Further, the exclusion of Loudoun County Transit and Omniride from the study do not allow for a holistic view of bus transit from Northern Virginia into the District of Columbia.

The transition of routes from WMATA to local providers has been successfully undertaken in the past, using state resources to support capital and operating needs. Any large scale shift in responsibility will place additional financial responsibilities on the Commonwealth, while financial assistance to WMATA has been increased significantly. Operating efficiency, increased ridership, and cost reduction could all result from transforming the network, but only if such a redesign is undertaken in a thoughtful, deliberate, and inclusive manner. Therefore, additional study is necessary to fulfill the recommendations of the LaHood report and ensure that implementation of a “bus reset” is comprehensive and can be supported by all of the stakeholders.

Consolidation of Functions

Throughout the strategic recommendations, there is a recurring theme of consolidation of functions. There are a number of efforts already underway in the region to coordinate mobility options/initiatives and the outcome of this strategic effort should drive towards leveraging existing regional efforts and not just consolidate responsibility within WMATA. Should the region pursue a formal coalition, it will be critical that such a coalition listens to and meets the needs of individual jurisdictions. Additional work is necessary to more clearly define what is being proposed and better articulate the intended outcomes.

Thank you for the opportunity to participate in this regional effort. DRPT is committed to improving personal mobility in an efficient and effective manner, and is committed to being part of the solution going forward. If you have questions regarding these comments, please contact Jennifer DeBruhl at (804)786-1063.

Sincerely,



Jennifer Mitchell



DEPARTMENT OF TRANSPORTATION AND ENVIRONMENTAL SERVICES
Transportation Planning Division
301 King Street, Suite 3600
Alexandria, Virginia 22314
www.alexandriava.gov

June 5, 2019

Bus Transformation Project Team
c/o NeoNiche Strategies
4501 Ford Avenue, Suite #501
Alexandria, Virginia 223102

Re: Comments on Draft Bus Transformation Project Recommendations

Dear Bus Transformation Project Team:

The City of Alexandria and DASH would like to thank WMATA and the consultant team for involving the City in the Bus Transformation Project process and providing this opportunity to comment on the draft recommendations. The City recognizes that the region cannot build its way out of congestion and that a transformation of the bus mode represents the least expensive and most impactful way to address the mobility needs of our region's residents and visitors.

The City supports many of the recommendations in the draft strategy document and has already been advancing many of these strategies within the City in coordination with WMATA. However, we would like to provide the following comments and suggestions to help shape the final recommendations and regional implementation:

Strategy 1: The City supports a more streamlined fare structure and more useful and equitable pass products in order to make the system more accessible and easier to use for all users. However, we will need to ensure that the cost impacts of these efforts are distributed fairly.

Strategy 2: The City supports the recommendations for bus transit priority measures under Strategy 2. The City has led the effort to implement bus rapid transit (BRT) in the region, through a partnership with Arlington County on the Metroway service, and is working to advance two other BRT corridors within the City. The City and DASH are also in the process of implementing a city-wide network of Transit Signal Priority (TSP) systems. A regional framework for advancing bus priority more broadly and where data indicates it is most important will ensure positive outcomes for our riders.

Strategy 3 (A) and 4: The City has reservations about the proposal to take over the operation of additional routes. In short, the City does not believe that this study is the proper mechanism to reassign routes to different providers and does not agree with all of the proposals and assumptions for doing so.

Specifically, the City has concerns that the proposed criteria would result in multi-jurisdictional routes that likely warrant being operated by a regional provider, such as the 10B and 25B which operate between major centers of activity in both Alexandria and Arlington.

Beyond the criteria, the cost savings articulated in the strategy document do not reflect actual costs, as costs are increasing to operate service for many jurisdictions. Moreover, the need to operate out of additional facilities due to an increase in fleet size will have significant impacts on operations that do not seem to be taken into account in the study.

The City therefore recommends that if WMATA wishes to re-designate routes, the final set of criteria are not established until after both the bus network plan in Strategy 3 and a more detailed analysis of the cost implications and benefits for all parties are developed.

Lastly, the City of Alexandria is currently conducting a bus network redesign of its own, the Alexandria Transit Vision Plan, to realign all routes in Alexandria most efficiently to meet the needs of residents. The core goals and objective of this ATV Plan are in alignment with the goals and objectives of the Bus Transformation Project, and Planning staff from WMATA and other partner agencies have been directly involved in the development of the ATV network designs. Based on this, the City of Alexandria and DASH strongly recommend that WMATA use the final ATV Plan recommendations for Alexandria as a key input for the development of the broader network redesign.

Strategy 5 (A): While the City supports improvements in efficiencies, the cost savings achieved by streamlining back office functions may result in more challenges than the cost savings are worth. The \$11 million estimate relative to WMATA's \$1.1 billion operating budget is fairly insignificant. WMATA should weigh the benefits versus the costs before advancing this recommendation.

Strategy 6: Regional coordination and support will be necessary to implement the strategies in the Bus Transformation Project. The City recommends building off existing structures and mechanisms wherever possible to achieve the greatest likelihood of success.

Thank you again for the opportunity to provide feedback. We look forward to working with you as this process advances into implementation.

Sincerely,



Yon Lambert
Director of Transportation & Environmental Services
City of Alexandria



Josh Baker
General Manager
DASH

Bus Transformation Project

Comments by Monica Backmon on behalf of the Northern Virginia Transportation Authority (NVTA)

My comments are based on the full Bus Transformation Project (BTP) document.¹

Appendix B, starting on page 214, lists the detailed goals/objectives. Of particular interest to NVTA are:

- Goal 1 (p215) under the general title of 'Regional Connectivity' to 'Provide reliable on-street transit options that efficiently connect people to places and improve mobility.'
- Goal 2 (p216) under the general title of 'Rider Experience' to 'Ensure a convenient, easy-to-use user-centered travel choice'.
- Goals 1 and 2 appear to drive many of the recommendations associated with Elements 1 thru 3.

Objective 1-b specifically seeks to 'Mitigate congestion by increasing transit usage.' This is broadly consistent with the vision and goals of NVTA's TransAction² and the project selection process for our Six Year Program. It would be truly transformational for the region if increased ridership leads to reductions in AADT, VMT, and/or congestion, by even a few percentage points. **Consequently, I strongly support Objective 1-b, and my comments are focused on this objective.**

I commend the BTP team for producing a draft strategy with a strong customer focus, but it is difficult to discern strategies that specifically address attracting new riders versus existing riders. In places the document is worded in a way that implies existing riders are the primary focus of the BTP, but that will not accomplish Objective 1-b. While the recommendations associated with Elements 1 thru 3 are necessary, I question whether they are sufficient to encourage transit use by drive-alone travelers who rarely ride transit. **I suggest that the recommendations be modified or supplemented with new riders in mind.**

As future action plans are developed, **I recommend that consideration be given to a multi-jurisdictional corridor-based pilot deployment that specifically seeks to accomplish Objective 1-b**, by attracting new riders to a fast, frequent, reliable transit service connecting major origins with major destinations in the selected corridor. Keep in mind that analysis conducted for TransAction highlighted that a significant portion of NoVA commuter trips begin and/or end in Fairfax County, or pass through the County. A pilot focused on Tysons may be a good starting point. Lessons learned from the pilot will be invaluable for any future expansion of the pilot across the region.

I recommend that the development and implementation of such a pilot, and any subsequent expansion, be conducted jointly by all relevant transit agencies, highway agencies, and funding entities, following a thorough examination of travel demand and a full understanding of the factors that are key to accomplishing modal transfer. Extraordinary levels of market research, public engagement, education, information, and customer service will be critical to success of Objective 1-b.

¹ See <https://bustransformationproject.com/wp-content/uploads/2019/05/Detailed-Document-Bus-Transformation-Project-Draft-Strategy-2019-05-06-1.pdf>

² TransAction is the long range, multimodal transportation plan for Northern Virginia. NVTA is responsible for developing TransAction, which is updated on a five-year cycle. The current version of TransAction was adopted by the Authority in November 2017.

I do not plan to make comments on Goals 3 thru 5 or the recommendations related to Elements 4 thru 6. While these are important and complementary, I consider it is more appropriate for our member jurisdictions to address these. Suffice it to say, project selection and programing using the Authority's regional revenues are subject to compliance with Virginia Code and the Authority's prevailing processes.

I note that the exclusion of PRTC from the BTP, while understandable, may potentially limit the effectiveness of future actions from a NoVA perspective, especially when you consider the potential for AADT and VMT reductions by long distant drive-alone commuters from outer jurisdictions.



Office of the Director

June 5, 2019

Bus Transformation Project Team

RE: Bus Transformation Project

Dear Bus Transformation Project Team:

Thank you for the opportunity to participate in the Bus Transformation Project as part of the Strategy Advisory Panel. The DC Office of Planning (OP) is committed to the values expressed in the Draft Strategies Report, including making transit more people focused and prioritizing bus service on District and regional roadways. OP develops and manages land use-based policy through tools including the Comprehensive Plan that prioritize transit-oriented development. The goal of this guidance is to create an urban form and transportation system that encourages people to take trips using transit, by walking and/or biking.

OP offers the following comments on the Bus Transformation Project Draft Strategy published May 2019 with the goal of strengthening the connection between bus transit and the land use and people it serves.

General Comments

- The plan does not recognize the intertwined relationship between bus and the land uses it serves. A key to transit's success is connecting people to their jobs, services, and entertainment needs. This relationship should be detailed as one of the emphasis in either *Strategy to Action 2* or *3*.
- There should be a bigger emphasis on the economic opportunities that the bus system provides its riders who would otherwise be left out of the job market.
- How does this plan relate to other regional and jurisdictional transportation and transit plans? This should be explained in the report; for the District specifically, how the Bus Transformation Project Draft Strategy relates to moveDC and Visualize 2045.
- The plan briefly recognizes that transportation preferences have changed but does not have a significant dialogue about how the plan addresses these preferences. Will this strategy be successful in an ever-evolving transportation landscape?
 - Specifically, major upcoming technological changes will happen over the 10-year life of this 'plan'. These potential changes are only slightly acknowledged, but not flushed out in detail. The plan could address how changes will be monitored and addressed.



- The plan recommends many actions that would require their own studies. Is there an identified work plan to initiate these efforts following the completion of the plan?
 - The task force recommended in Strategy to Action 6 does address some of the near term (three years) efforts but is light on the details of what these efforts would entail.
- The plan does not address the relationship between the region’s bus system and Metrorail. There should be a more robust discussion of how the repositioning of bus complements and supplements the Metrorail.
- The plan recommends a new regional board to guide bus. How is this different than existing regional boards that already focus on transportation including WMATA and TPB?

Specific Comments

- Page 4 – should the first bullet be better and faster transportation? Currently the first result is “reduce congestion and emissions.”
- Page 5 – references needs to overcome transportation challenges to continue to grow and compete with other regions around the country.
 - OP comment: should we reference our importance on the world stage as a world capital?
- Page 66: discusses the benefit of electric bus, specifically references that “electric bus garages are more community-friendly than existing bus garages; as a result, less pushback from NIMBY’s.”
 - OP comment: rather than referencing NIMBY’s, the comment should reference surrounding communities. In addition, there should be an acknowledgement that electric bus garages have the potential to be in more vertical structures, and provide additional housing, office, or creative space.
- Page 74: discusses how planning and execution of bus priority projects are currently done in the region.
 - OP comment: jurisdictions are required to ensure that land uses around many of these priority bus corridors have the adequate populations to support dedicated services. Often the planning process reflects the intertwined relationship between enhanced transit service and the land uses that support the facilities.
- Page 77: recommends adopting consistent priority guidelines for corridors across the region.
 - OP comment: please include references that prioritization on corridors with high density, transit friendly land use will help to make bus an even more attractive option and improve service efficiency. This relationship needs to be elevated in the document. Bus ridership is dependent upon the type of land uses served.
- Page 81: indicates that a key consideration should be to maximize return on investment for bus priority treatment.
 - OP comment: this should include a reference to the ability of surrounding land to be densified based on the improved transit facilities and the potential for value capture of land use value increase and/or improvements.
- Page 90: References encouraging shifts away from low-occupancy vehicles will benefit transit riders and the region. One of the benefits indicated is “more sustainable land use development – less space needed for personal vehicles can be used for other purposes.”
 - OP comment: This claim is likely true, but too vague and unsubstantiated. The benefits should be elaborated on, specifically what space will be used differently. Also, the description indicates that land use development would change, but does not indicate how.

- Page 173: Recommends that after three years of the task force’s work, responsibilities should be transferred to a formal Coalition of jurisdictional representatives with authority for implementation.
 - OP comment: How is this different than the existing WMATA Board, or the recommendation for dedicated staff different WMATA’s bus planners? How would it relate to TPB or NVTC in Virginia? This sounds like an additional layer of bureaucracy that does not have a clear purpose or expressed empowerment. How would this new entity be funded?
- Page 174: Hold transportation and transit agencies accountable for prioritizing bus as a primary mode of transportation within their organizations.
 - OP comment: There is not any recognition that the priority comes from funding bodies including elected boards/councils/legislatures. There should be a recognition that this plan will take more than organizational will, it will take political will from multiple jurisdictions across the region.

If you have any questions about or would like to discuss our comments, please contact Kristin Calkins via the telephone at 202-442-8812, or via e-mail at kristin.calkins@dc.gov. Please note that while the District of Columbia Department of Transportation (DDOT) will submit separate comments, OP and DDOT have coordinated to ensure consistency.

Thank you again for the opportunity to be involved in the Study and to comment on the Draft Strategy. The Office of Planning looks forward to continued coordination on how bus can best serve District residents and the region.

Sincerely,



Andrew Trueblood

cc: Jeff Marootian, Director, DDOT
Sakina Khan, Deputy Director, Citywide and Strategy & Analysis, OP
Dan Emerine, Manager, Policy and Legislative Affairs Division, DDOT



May 21, 2019

Shyam Kannan
 Vice President of Planning
 Washington Metropolitan Area Transit Authority (WMATA)
 600 5th Street, NW
 Washington, DC 20001

Re: Comments on Bus Transformation Project

Dear Mr. Kannan,

Thank you for the opportunity to comment on and participate in the Bus Transformation Project. We are writing as members of the Strategic Advisory Panel and Technical Team. These comments represent Arlington County’s position on the strategies and recommendations in the draft report.

In general, Arlington County is very supportive of efforts to increase ridership, market Metrobus, offer better pass options, and install priority treatments on County-owned roadways. We also agree with the vision statement of the project. However, we feel that the recommendations regarding transfer of service to local operators and changing the regional/non-regional formula are an overreach into an area of WMATA board policy. We encourage staff to seek authorization from the Board of Directors to begin a study on these topics during FY20 before any route transfers are considered or a change to an existing formula is proposed for discussion.

As a community, Arlington has always valued transit. Our investment in WMATA is reflected in bus and rail ridership, which is the highest of any jurisdiction other than the District of Columbia. Additionally, we have consistently demonstrated how much we value transit in the way that our community has developed around rail stations.

Below are our specific comments on individual strategies in the draft report.

Strategy 1: The bus system should be customer focused and an easy-to-use option that people want to ride.

Arlington is already moving forward with several strategies that are listed including accepting regional passes, making fares consistent with WMATA, improving bus stops, and modernizing our bus fleet. We also market Metrobus and ART through Arlington County Commuter Services (ACCS) programs such as the Car-Free Diet, Arlington Transportation Partners, Mobility Lab, Commuter Stores, transit information screens, and various social media platforms.

Strategy	Arlington Comment
Expand marketing efforts related to bus.	Strongly support.
Make bus easy to understand with legible maps and consistent naming conventions.	Could support for Metrobus. Recommend setting up working group to discuss.

Create a single mobile app that allows payment and real time information.	Could support. ART accepts SmarTrip and real time information is already publicly available.
Make bus fares clear and consistent.	ART fares already mirror Metrobus.
Introduce passes that work across systems.	ART accepts SmarTrip, open to SelectPass.
Enhance pass products for low income riders.	Support for Arlington. Allow opt in for others.
Allow free transfers between bus and rail.	Support pending revenue/ridership study.
Make bus stops safe, convenient, and accessible across the region.	Support. Arlington has stop improvement program.
Modernize the region's bus fleet with energy saving, green technology.	Support depending on cost-benefit and availability of funding for facility retrofit.

Strategy 2: Prioritizing buses on major roads is the fiscally responsible way to move most people quickly.

We support this strategy and will work with the Virginia Department of Transportation (VDOT) to prioritize buses on a corridor-by-corridor and in some cases street-by-street or intersection-by-intersection basis where WMATA requests. Our Traffic Engineering & Operations (TE&O) will work directly with WMATA and where feasible.

Strategy	Arlington Comment
Obtain commitments from local and state jurisdictions to prioritize bus.	Support for County-owned roads. Will work with WMATA on VDOT-owned roads.
Adopt consistent priority guidelines for corridors across the region.	Support individual corridor studies on a case-by-case basis and retain local guidelines.
Develop enforcement programs that maximize the effectiveness of bus priority.	Could support depending on implementation.
Offer incentives to jurisdictions encourage implementation of regional priority guidelines.	Could support depending on specifics.
Coordinate with regional congestion mitigation efforts, curb access management, and parking limitations.	Support. Arlington is willing to proactively manage curb space and already limits on-street parking for bus stops.

Strategy 3: Frequent and convenient bus service is fundamental to accessing opportunity, building an equitable region, and ensuring high quality of life.

While the goal is laudable, many of the strategies listed are not practical. The Virginia Department of Rail and Public Transportation (DRPT) already requires transit operators to maintain and annually update a Transit Development Plan (TDP). These plans supersede any regional plans and also address WMATA service within Compact jurisdictions. Additionally, WMATA is required by the Compact (Section 16) to adopt and maintain a mass transit plan. While historically this plan has not focused on bus service, WMATA should already be maintaining a regional plan for Metrobus.

Also, WMATA has already adopted service standards to measure the productivity of bus service. The WMATA board has approved these service standards, and the Bus Transformation Project has not demonstrated that they need to be updated or replaced. Instead WMATA should reinstate quarterly and annual reporting on productivity measures by route.

Strategy	Arlington Comment
Develop a regional bus network plan.	Modify. WMATA should develop and maintain a multi-year TDP for integrated rail and bus service.
Adopt consistent guidelines across region.	Support existing WMATA service standards. Jurisdiction reserve right to adopt standards better tailored to local needs.
Provide flexible, on-demand transit service.	Support if developed as collaborative partnership between WMATA and local jurisdictions.

Strategy 4: Balance local and regional provider responsibilities by positioning local bus systems to meet the jurisdictional needs and the regional bus system to meet regional needs and deliver regional benefits

The recommendations listed in this chapter are highly problematic. WMATA already has a regional and non-regional formula that has been adopted by the board and resulted from an extensive regional debate. The Bus Transformation Project has not demonstrated that the existing formula needs to be updated or replaced. If staff feel the formula needs to be replaced, they should seek authorization from the board to convene a task force, report back to the board, and seek authorization to change rather than burying it in a consultant report.

Specifically, Arlington is not willing to transfer the 41, 42, 43, or 87 to WMATA and will not accept a transfer to ART of the 2A, 4A, and 4B, all of which have significant mileage in Fairfax County. Proposing such in a consultant report is an overreach by staff into a rightful area of board policy.

Strategy	Arlington Comment
Position the regional bus system to provide the services that meet regional needs.	Oppose definition of regional in draft strategy report. Recommend board revisit.
Revise the cost local jurisdictions pay WMATA for local service.	Oppose blended rate. Jurisdictions should retain option to purchase service at marginal rate.
Facilitate short-term operations of local service.	Oppose recommendations for Arlington.
Develop a 10-year plan to allocate service between bus systems for applicable routes.	Oppose. Recommend WMATA develop collaborative process with jurisdictions prior any suggested route transfers.

Additionally, there are several specific statements with which Arlington does not agree:

- 1) The three criteria for Metrobus service on page 124,
- 2) The statement that routes that are not eligible for regional operation should transfer to local operators over a 10-year period and the new cost for non-regional service on page 125,
- 3) The note on page 132 that a jurisdiction should operate a route that has at least 50% or the largest share of stops,

- 4) The statement on page 135 that non-regional service is contracted out based on actual cost and is not considered as part of the 3% subsidy cap, and
- 5) The operations, maintenance, and overhead costs for ART on page 143.

Arlington could support a collaborative process with WMATA that on a route-by-route or segment-by-segment basis determines whether WMATA or Arlington should operate a route or segment. We encourage WMATA to develop that process. Arlington strongly supports WMATA maintaining a non-regional rate for service requested by and within the boundaries of a single jurisdiction. We feel that non-regional service should be charged to jurisdictions at \$104.74. Regarding the 3% cap, we strongly feel that both contracted and non-regional service must be operated within it. Finally, we note that all of WMATA’s current collective bargaining agreements have been negotiated with a less than 3% annual increase, for which we strongly commend WMATA management.

Strategy 5: Optimize back-office functions through sharing, streamlining and shared innovation by consolidating regional resources and devoting more resources to operating bus service.

We are generally agreement with this statement and already collaborate with other jurisdictions, WMATA, regional agencies, and state agencies on specific functions.

Strategy	Arlington Comment
Consolidate back-office support functions.	Already occurs. Limited opportunities to expand.
Establish Regional Mobility Innovation Lab.	Needs further explanation.
Develop regional standards for bus stop data.	Regional collaboration already occurring. Could be enhanced.

Strategy 6: Customers in a region with multiple bus providers need a regional steward to transform the bus system.

While this statement is generally true, WMATA already is the regional steward of the bus system. Additionally, the Metropolitan Washington Council of Governments (MWCOC) already houses a Regional Public Transit Subcommittee (RPTS) and Metropolitan Operations and Intelligent Transportation Systems (MOITS) Technical Committee that are meeting this stated need.

Strategy	Arlington Comment
Form a regional task force responsible for Bus Transformation Project execution; transfer responsibilities to Coalition.	Identify agency to house and ensure willingness to support prior to forming Coalition. Recommend MWCOC.
Hold transportation and transit agencies accountable for prioritizing bus.	Not necessary. Already addressed in Strategy 2A.
Publish annual Bus Transformation and bus performance scorecard.	Support. Recommend MWCOC produce with WMATA input.

Thank you again for the opportunity comment. Please contact Tim Roseboom at (703) 228-0090 or troseboom@arlingtonva.us if you have any questions or concerns.

Sincerely yours,



Dennis Leach
Director of Transportation



William Jones
Transit Services Manager



Lynn Rivers
Transit Bureau Chief



Tim Roseboom
WMATA Services Coordinator

Cc: Christian Dorsey, Chair
Mark Schwartz, County Manager

From: [Charles Steigerwald](#)
To: [Bus Transformation Project](#)
Subject: Comments on Bus Transformation Project Draft Elements and Recommendations
Date: Friday, June 7, 2019 10:18:16 AM

We at OmniRide understand the rationale for excluding commuter bus services and local services that are outside of the WMATA compact area from consideration in the Bus Transformation Project. At the same time we recognize that our current and potential riders would benefit from an improved regional bus network. While the majority of our Express service riders don't regularly interact with the existing regional network an improved network would result in enhanced travel options for our riders and expand our perceived service footprint. We also operate service that feeds directly into the regional bus network at the Tysons Corner and Franconia-Springfield Metro Stations. In general, we're supportive of the effort to improve the regional network and are in agreement with these draft recommendations. We do believe that expanding participation in some efforts beyond compact operators would be beneficial to all parties – including bus riders throughout the region.

OmniRide services have been a part of the regional transit network for many years and we are or have been participants in many regional transit efforts. Prince William area residents and employees are certainly part of the regional travel mix. While it makes sense to separate out commuter bus for consideration of certain elements of the transformation project – route naming conventions, consideration of operating responsibilities between WMATA and other compact jurisdictions, for example – others should include **all** regional bus operators. Continued cooperation on fare products and policies, data standardization, and the development of an innovation lab are all examples of recommended efforts that will benefit from expanding participation beyond the compact operators. Outer-ring suburban jurisdictions like Prince William County will continue to experience significant growth in both residential population and employment resulting in more local transit service as well as a greater focus on regionally connected services. To exclude operators from these areas from participation in these regional efforts seems, at best, short-sighted. A few comments directed at specific elements or recommendations follow.

Recommendations: Make bus fares clear and consistent across the region. Create a mobile solution that allows riders to plan and pay for trips, and access real-time service information.

Comment: All SmarTrip regional partners should have a seat at the table when discussing changes to regional fare policies and products. The region has long cooperated on fare collection and creating barriers for transit users in jurisdictions that have long benefited from this cooperation because they are not considered in the transformation project would be counter to the goals and objectives of the project.

Recommendations: Position the regional bus system to provide the services that meet regional need. Develop a 10-year plan to optimally allocate services between bus systems for applicable routes.

Comment: The Virginia Department of Rail and Public Transportation bases transit operations funding on certain performance measures (including revenue hours, revenue miles and ridership). The transition of non-regional routes to local operators and all regional routes to WMATA should

include an analysis of impacts on state funding and provisions to hold jurisdictions harmless for any net funding losses. Especially since the routes transitioned are likely to have a significant impact on the DRPT performance measures due to route lengths and shifts in ridership. A net calculation considering local operator's loss/gain of state funding as well as required portion of regional bus operations would be necessary to fully understand the budgetary impact to local operators.

Element: Streamline back office functions and share innovation by consolidating regional resources and devoting more resources to operating bus services.

Comment: This effort should be expanded beyond the regional bus services concept to include opportunities for participation by operators of bus service not considered as part of the transformation project. Including data from commuter bus agencies would provide a more comprehensive picture of regional travel patterns. Any efforts related to fare collection should obviously include all of the current regional SmarTrip partners. Restricting participation in a regional innovation lab would simply serve to shut out potential innovations that may come from or through these operators and prevent innovative solutions from being easily adapted across the entire region. Including commuter bus in real-time information and trip planning platforms would further incentivize use of the regional bus system by those in the outer suburbs. Creating barriers to participation for tens of thousands of regular travelers by virtue of the study's limits fails to recognize the current and potential benefits of inclusion where appropriate.

It's easy to understand why operators outside the compact area or certain service types are not considered for inclusion in the project-defined "regional bus system", that doesn't mean that those services are not part of the regional bus system. The project should acknowledge this by plainly identifying those elements or recommendations that should or could include wider participation.

Thank you for the opportunity to provide comment.

Chuck Steigerwald
Director of Strategic Planning
Potomac and Rappahannock Transportation Commission
703-580-6144
csteigerwald@omniride.com

Date: June 7, 2019

From: Coalition for Smarter Growth

To: Bus Transformation Study

Subj: Comments on Bus Transformation Study

Thank you to the entire Bus Transformation Team, and every member of the advisory committees for your dedication and expertise in developing the draft strategy. We support the draft strategy to a significant extent, and will limit our comments to the strategy components:

Strategy 1 – Customer focus – Support

We wish to particularly highlight the importance of:

- Improve bus riders' experience with bus shelters, real-time information, accessibility at all bus stops
- Free transfers between bus and rail
- Low-income rider discounted fares/passes

Strategy 2 – Prioritizing buses – Support but with critical recommendations

We particularly wish to highlight the importance and need for:

- Dedicated Bus Lanes: on all PCN routes - support regional coordination for standards.
- Bus Lane compliance: Enforce bus stop and lanes compliance, expanded peak period parking restrictions/phase out of parking on all bus lane corridors & high ridership routes
- All-door boarding: Implement cashless, all-door boarding on all MetroExpress routes by 2022
- Transit Signal Priority (TSP): Refine TSP performance and expand to all PCN intersections.
- Queue Jumps: Add queue jumps to key bottlenecks on all PCN routes
- Limited stop service: Add MetroExpress, limited-stop service to all top ridership corridors (99, 80X, A7)
- Bus stop consolidation

We need urgent action by elected officials to require DOT's to provide road space for dedicated lanes. This must be a top priority. Dedicated bus lanes need not and should not be tied to expanding arterial roads but should begin with, wherever possible, with conversion of existing lanes.

Strategy 3 -- Frequent, reliable, convenient service – Support but with critical recommendations

We believe that bus network redesign should also be a top priority after adoption of this report and should be completed prior to decisions about who should operate particular services. This redesign should be done in parallel with negotiating a regional commitment to dedicated bus lanes.

We are concerned about the mention of tying service to demand if it is applied too rigorously. Because of the role that high-frequency bus can have in shaping land use there are cases where it must be put in place in the early stages of redevelopment. An example is the Metroway which has taken time to build ridership, but we are seeing it grow as redevelopment continues and residents choose a location where they can live car free or “car-lite.”

At the same time, we want to ensure that the focus on high frequency, high ridership routes does not leave lower income communities behind. Good coverage is needed, particularly for lower income communities in suburban areas, but will also be challenging in areas that lack good street grids. The Council of Governments Equity Map and other social equity maps, including the COG/VCU health indicator maps are good resources to use when developing new networks and ensuring adequate coverage.

Strategy 4 – Regional and local service – Concerns

We believe that consideration of this issue should be deferred pending completion of a bus network redesign study for the entire regional network including the local services. Once we have defined the service structure that we need, then the decision can be made about which entity should operate the service.

At the same time, we are concerned that the regional vs local framing might not result in the proper analysis of the functions of bus service in various contexts. For example, the main types of service might be considered to be: 1) peak hour commute; 2) TOD supportive high-frequency, all-day rapid transit; 3) local and equity coverage service -- rather than the regional v local paradigm.

As noted re Strategy 3 above, we do not want the region’s bus system to become one focused only on high ridership, longer distance, peak hour commute service. We are concerned for example that the toll lane-funded projects have already directed significant funding to long distance service, while we are not providing sufficient funding for “density” of service for existing communities within and near the Beltway where more compact land uses merit more routes and more frequency.

We believe caution must be exercised regarding the proposed devolution of more service to local providers. The advantage of the WMATA regional compact and the hoops required prior to reducing service are such that it can protect and stabilize bus service, whereas local control potentially puts bus service at greater risk during periods of political turnover and budgetary challenges. Service could be quickly cut and lost, and restoration difficult. Recently Montgomery County cut a few high ridership RideOn routes and almost cut more. If bus is to be the mode of choice and we are to have a strong regional network, then it seems best to have a strong regional coordinating body and commitments to maintaining consistent and growing service.

Strategy Five – Streamlining back office and fostering innovation – Support

Strategy Six – Coordination – Support

We think that the task force to champion and advance the reform agenda, and an annual report card, are particularly important and wish to serve on this task force and be a non-profit partner in the annual report card.

Thank you,

Stewart



City of Fairfax, Virginia

10455 Armstrong Street • Fairfax, VA 22030-3630
703-385-7930 • www.fairfaxva.gov

June 7, 2019

Allison Davis, Director of Planning
Washington Metropolitan Area Transit Authority
600 5th Street NW
Washington, DC 20001

Re: Comments on the Bus Transformation Project (BTP)

Dear Ms. Davis,

Thank you for the opportunity to provide feedback on the Bus Transformation Project (BTP). We are writing as members of the Strategic Advisory Panel and Technical Team to share feedback representing the City of Fairfax, Virginia.

In general, the City of Fairfax is very supportive of efforts to improve bus operations and the experience of bus riders (including on bus service provided by local jurisdictions as well as Metrobus). We support strategies and actions that increase reliability, improve customer experience, and increase efficiency of operations. However, we are concerned that some specific recommendations in the BTP have not been developed with sufficient analysis and input from stakeholders, particularly the redefinition of regional and non-regional routes and responsibilities. Rather than seeking to define specific guidelines and criteria within this larger study, we encourage staff to work with the regional partners to study changes to the regional/non-regional routes and formulas.

Below are additional comments on the individual strategies in the draft report.

- Strategy 1: The bus system should be customer focused and an easy-to-use option that people want to ride.
 - We support moving forward with a number of actions in this strategy to leverage and expand on existing efforts in this area and achieve early successes with “low hanging fruit”. The City of Fairfax CUE already accepts SmarTrip and regional pass products, and are engaged in a project to improve bus stops in our jurisdiction.
 - We fully support recommendations to expand marketing, introducing new pass products, incentivizing employer-supported transit benefits, and improving bus stops.

- We conditionally support recommendations to improve legibility of the system, creating a mobile app, making bus fares consistent, enhancing reduced fare products for low-income riders, allowing free transfers between bus and rail, and modernizing the region's bus fleet with green technology. We would support these initiatives pending further analysis of costs and benefits and further discussion of how these are implemented on Metrobus versus local bus systems.
- Strategy 2: Prioritizing buses on major roads moves the most people in the quickest, most reliable and fiscally responsible way.
 - We support the recommendations in this strategy, with the caveat that bus priority corridor improvements will need to be evaluated and implemented on a case-by-case basis. Regional guidelines for bus priority corridors, curb access, and parking management may not be successful as a “one size fits all” solution; the City of Fairfax is willing to consider regional guidance but may establish local guidelines.
- Strategy 3: Frequent, reliable, and convenient bus service is fundamental to offering equitable access to opportunities and improving quality of life across the region.
 - We conditionally support the recommendations in this strategy. The development or update of a regional bus network plan should build on WMATA's current regional mass transit plans and should be done in close coordination with local agencies and jurisdictions, given that we already develop our own Transit Development Plans with consideration of WMATA service. Updates to service guidelines should not be adopted without first evaluating WMATA's existing service standards. Local jurisdictions may also adopt local standards.
- Strategy 4: Balancing the responsibilities of local and regional providers will position bus systems to meet their own jurisdictional needs and the regional bus system to meet regional needs and deliver regional benefits.
 - We do not support the re-definition of regional and non-regional service and reallocation of services and costs as recommended in this strategy. While there may be a case for updating regional service definitions and while the City of Fairfax would be willing to collaborate on a more in-depth study of this topic, the specific recommendations in this strategy are premature. The impacts on local budgets and service quality have not been adequately evaluated. Further, decisions about regional bus responsibilities are closely linked to other proposed strategies in this plan (such as Strategy 3) and should be developed and evaluated in coordination with related strategies. We recommend that this strategy be modified to further study this issue in conjunction with updates to service standards and the regional bus network.
 - Additionally, we do not agree with the decision to include the City of Fairfax in Fairfax County when analyzing inter-jurisdictional routes (page 118 of the detailed report). The

City is an independent jurisdiction with separate budgeting and policy processes and is a separate member of the Compact, and the implications of providing regional service and allocating regional costs need to be evaluated with this in mind.

- Strategy 5: Streamlining back-office functions and sharing innovation will help all operators and allow more resources for operating bus service.
 - We support the goal of this strategy, and would welcome further discussion of what functions are already coordinated and what opportunities exist to expand coordination and consolidation. We would also welcome opportunities to coordinate on innovation, with recognition of existing local and state innovation efforts, and we would support efforts to improve regional data collection, analysis and data sharing.

- Strategy 6: Transforming and incorporating changes in bus service operated by multiple providers across the region will require centralized leadership, coordination and collaboration.
 - We support the goal of this strategy and agree that regional bus improvements should be led by regional stewards. However, we do not see the need for a new separate body to carry this out. Relationships and responsibilities within existing organizations including WMATA, MWCOG, and other regional entities should be used and enhanced to provide the necessary coordination and authority to implement improvements.

Thank you again for the opportunity to provide feedback. Please contact us if you have any questions or concerns.

Sincerely,



Chloe Ritter
Multimodal Transportation Planner

CC: Wendy Block Sanford, Transportation Director
Rob Stalzer, City Manager



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

June 10, 2019

Bus Transformation Project Team
c/o Washington Metropolitan Area Transit Authority
600 Fifth Street, N.W.
Washington, DC 20001

Reference: Draft Bus Transformation Project Strategy

Dear Bus Transformation Team:

The Fairfax County staff has reviewed the Draft Bus Transformation Project Strategy. Enclosed are the combined staff comments on the six strategies. While the staff agrees with several of the sub-strategies, there are others that either require additional refinement or are elements that cannot be supported at this time.

The most significant of the supportable strategies is the transfer of 26 Metrobus routes within Fairfax County to the Fairfax Connector (as stated in Section 4) overtime; although, this strategy still needs implementation plan refinement regarding the transfer of transit services. However, the staff does not support the transfer of any existing Fairfax Connector routes to the Washington Metropolitan Area Transit Authority (WMATA); therefore, those specific recommendations should be deleted from the plan.

Additionally, the staff supports the strategies of implementing traffic signal priority and roadway infrastructure that can improve transit service and on-time performance; although, implementation would vary widely across the region. Since the Virginia Department of Transportation (VDOT) has authority over the roadway network, any strategy impacting the roadway network would require a comprehensive and cooperative process with VDOT. The plan needs to address this issue and provide a detailed implementation process.

Furthermore, the staff does not recommend creating any additional committees to oversee implementation and planning of the project's strategies, as several such oversight bodies already currently exist within Northern Virginia.

The following bullets detail the Fairfax County staff comments on the Draft Bus Transformation Strategic Project:

- Introduction section: We suggest including a statement about nationwide bus ridership to show that it is not solely the Washington, D.C., region that has experienced decreased ridership.

- Goal Overview: The local and regional provider responsibilities do not have to be “balanced,” as we are uncertain what “balanced” refers to in this context.
- Fairfax County already has programs similar to Priorities 1A through 1E, 1I, and 1J.
- Priority 1B: Adjusting system maps and route naming convention is a low priority, as passengers are more concerned that a bus arrives on time than what the route is numbered.
- Priority 1C: The regional pay app is acceptable to Fairfax County; however, the regional SmarTrip group is already working on a regional pay app as an outgrowth of the current SmarTrip card. Although this system is not perfect, it seems to work well for most people. Therefore, the staff suggests that creation of the pay app be a low priority. Also, it might be best to utilize an existing pay app employed by other transit systems, rather than create a new pay app.
- Priority 1F: This program may be beneficial with additional vetting. The program would need to be administrated by a non-transportation department agency, such as the Fairfax Neighborhood Community Services.
- Priority 1G: Free transfers between bus and rail has been previously considered. Although most regional staff are in favor of it, free transfers are unfortunately not considered financially feasible, because the revenue loss may be too large.
- Priority 1H: Employer outreach programs are currently utilized; however, additional incentives may be unaffordable. Furthermore, mandatory requirements may not be legal in Virginia. The Council of Governments has taken the lead regarding these efforts in the past.
- Priority 1I: Fairfax County currently has a program to upgrade bus stops and is improving 50 to 100 stops per year. As this program is generally limited by funding, more bus stops could be upgraded, if additional funding becomes available. Although uniform bus stops across the region are not necessary, the stops do need to contain certain standardized features, such as ADA accessibility.
- Priority 2A: Prioritizing all buses on roadways would require buy-in from VDOT, since it controls the highway system in Fairfax County. Additionally, a more structured process would be needed for traffic signal priority to be implemented in Northern Virginia. Without a well-defined process to move forward with VDOT and the Department of Rail and Public Transportation, many of the project’s recommendations and identified advantages would be difficult to achieve over the ten-year horizon. Therefore, the staff believes VDOT should have been an active participant in this project, since they control the majority of roadways in Virginia. However, Fairfax County is already working on certain bus priority corridors such as Routes 1 and 7. As well, the project needs to address the fact that local land use is controlled by the local governing bodies and is unique to each jurisdiction.
- Priority 2B: These guidelines should be consistent at the state level; although, they may be challenging to achieve across this region. In addition, WMATA and the Transportation Planning Board already identified regional bus priority corridors several years ago. Fairfax County is

currently working on the bus priority corridors along Routes 1 and 7. These two routes are considered high priority and will absorb the presently available funding.

- Priority 2C: The Virginia General Assembly has allowed red light camera enforcement (reluctantly), but not speed enforcement. Therefore, the staff believes the Virginia General Assembly is unlikely to allow transit lane enforcement by camera.
- Priority 2D: Fairfax Connector already has major incentives (such as increasing ridership and cost savings) to make bus service more efficient.
- Priority 2E: This program could be beneficial within this area; although, it would need to be implemented at the state level rather than regional level. Therefore, such techniques must be done in coordination with VDOT. Additionally, the rules and ownership of roadways are significantly different between Virginia, Maryland, and the District of Columbia. At this time, Fairfax County is initiating a parking management study to consider some of these methods.
- Priorities 3A and 3B: Virginia jurisdictions already have these types of guidelines and regional bus plan coordination.
- Priority 3B: As long as the jurisdictions are paying bus subsidies, each jurisdiction can and should decide on the level they are willing to pay for.
- Priority 3C: This is an option Fairfax County is already starting to explore.
- Chapter 4: This chapter needs to be modified. Regardless of service type, Fairfax County pays for all of the service within the County. This chapter is vastly incomplete regarding service types to be operated by certain operators and what savings may or may not be realized by shifting service between operators. Cost allocations are very complicated in our region; thus, it is challenging to equally and fairly compare the different operating costs. Furthermore, the regional and non-regional designations currently in use were based on WMATA's recommendations. Jurisdictions have made financial decisions based on their designations of regional and non-regional transit routes. Therefore, the project needs to be more inclusive of the local jurisdictions' definitions and financial authority.
- Chapter 4: Fairfax County staff is concerned that WMATA may see the rebalancing of local and regional provision of transit as a means to satisfy the three percent operating cap (imposed by the Virginia dedicated funding legislation) by simply moving the cost of service from one side of the ledger to the other instead of making fundamental changes to WMATA's cost structure. Staff recommends WMATA engage with the jurisdictions, and transit operators to ensure that any changes to how bus services are provided does no harm to our localities and ensures that jurisdictions' investment in WMATA provided service is commensurate with the level of service being provided.

- Chapter 4: The staff generally supports on the list of Metrobus routes for transfer over to Fairfax Connector overtime; although, a more detailed implementation plan and phasing of the route transfers would need to be developed, and resources will need to be approved by the Board of Supervisors. However, to maintain proper service levels for the Fairfax County residents, the staff does not support transferring any Fairfax Connector routes to WMATA. Therefore, those specific recommendations should be deleted from the project.
- Chapter 5: This chapter would require more examination to determine the potential savings. The rough estimate in this report is \$11 million regionwide, which is very small per funding jurisdiction. As well, the National Transit Database already does Priority 5C.
- Priority 6A: The staff supports a forum to discuss regional bus service issues and coordination, but does not advocate the scorecard concept or giving the forum any authority to impose regional bus positions. The type of information proposed as part of the scorecard is already reported by transit agencies in the National Transit Database. Furthermore, each jurisdiction has its own priorities for bus service being paid for. As such, Fairfax County is not willing to cede policy decisions to a regional group for the Fairfax Connector or Metrobus service it pays for. Therefore, the staff does not support decision-making and funding authority for the regional forum.
- The recommendations should be prioritized from those with the smallest impact and greatest benefit to those with the largest impact and most complex implementation. In addition, it would be helpful if the project developed cost estimates or ranges for the least to highest priority items.

Also, the Fairfax County Department of Planning and Zoning comments on the Bus Transformation Project are included as Attachment I to this letter.

While Fairfax County has stated several concerns with this project, the staff does agree with the overall objectives to improve transit service and increase coordination across the region. In addition, if Priority 1F is advanced; low-income fares would need to be implemented through the Fairfax Neighborhood Community Services. As well, the staff supports the general concepts of Priorities 4A and 4D, improving the regional bus system, developing a ten-year implementation plan, and opportunities for back-office functions (in terms of training and marketing).

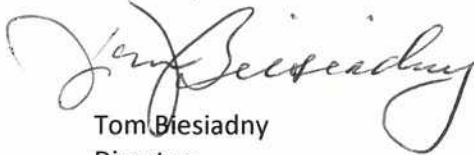
Bus Transformation Project

June 10, 2019

Page 5 of 10

We would appreciate the opportunity to meet with the WMATA and consulting teams to discuss the draft document and our comments. If you have any questions or need additional information, please contact Michael Felschow at 703-877-5612.

Sincerely,



Tom Biesiadny
Director

Enclosure: Attachment I

Distribution:

Fred Selden, Director, Fairfax County Department of Planning and Zoning

Barbara Byron, Director, Office of Community Revitalization

Marianne Gardner, Planning Director, FCDPZ

Meghan Van Dam, Branch Chief, Policy and Plan Development Branch, FCDPZ

Dwayne Pelfrey, Chief of Transit Service Division, FCDOT

Todd Wigglesworth, Chief of Coordination and Funding Division, FCDOT

Michael Felschow, Planning Section Chief of Transit Service Division, FCDOT



County of Fairfax, Virginia

MEMORANDUM

DATE: June 7, 2019

TO: Michael Felschow, Planning Section Chief, Transit Services Division
Fairfax County Department of Transportation

FROM: Meghan Van Dam, Branch Chief, Policy and Plan Development Branch
Fairfax County Department of Planning and Zoning *MVD*

SUBJECT: Bus Transformation Project

These comments were prepared by Sophia Fisher, Senior Planner in the Policy and Plan Development Branch. Questions or comments can be directed to her via phone at 703-324-1349 or via email at sophia.fisher@fairfaxcounty.gov. Fairfax County Department of Planning and Zoning staff appreciate the opportunity to provide comments on the Draft Bus Transformation Strategy, published in May 2019. The goals of the project, to increase transit ridership in the region and to provide a convenient alternative to single occupant vehicular travel, align with many of the goals of the Fairfax County Comprehensive Plan.

The primary focus of the Draft Bus Transformation Strategy is on operations and logistics, including streamlining bus routes, improving fare collection, and prioritizing high-frequency and high-capacity bus routes. Connecting transportation projects to land use and environmental policies is vital to the success of both; however, discussion of these connections is limited in the document. Staff believes that emphasizing the land use/transportation connection and environmental benefits is critical to the success of the Bus Transformation Project and has noted several ways that strategy elements 1, 2 and 3 can be revised to reflect the how land use policies support transit operations both now and in the future.

The following comments are based on the guidance found in the [Policy Plan Element](#) of the Fairfax County Comprehensive Plan¹ and the [One Fairfax Policy](#)². The relevant policies have been excerpted below.

¹ Fairfax County Comprehensive Plan, 2017 Edition, Policy Plan, Land Use, Transportation, Housing, and Environment Elements. <https://www.fairfaxcounty.gov/planning-zoning/comprehensive-plan/policy-plan>

² One Fairfax Policy, November 21, 2017 <https://www.fairfaxcounty.gov/topics/one-fairfax>

- General comment: Page 14, Principles to keep in mind, bullet 2: staff suggests that this bullet be expanded to include large buses on fixed routes that operate in dedicated lanes, such as a Bus Rapid Transit system.
- Strategy element 1: The bus system should be customer-focused and an easy-to use option that people want to ride.
 - 1.J: This recommendation discusses improving the environment by modernizing bus technology using such methods as electric buses. Staff suggests that this recommendation could be expanded to include a discussion of how a modern and efficient bus system could encourage people to ride transit instead of drive single occupant vehicles, thus helping to improve air quality because fewer cars would be on the road, consistent with other statements in the plan.
- Strategy element 2: Prioritizing buses on major roads is the fiscally responsible way to move the most people quickly and reliably.
 - 2.A: In addition to prioritizing bus on major corridors within their boundaries, staff suggests that this element to be expanded to include an emphasis on aligning bus service with employment centers, housing concentrations, and other major destinations. This also has the potential to improve air quality and public health, by reducing congestion and encouraging people to use transit instead of single occupant vehicles and by walking more.
 - 2.A: Consideration should also be given to the potential for future growth and development when prioritizing buses on major roads. As an example, Fairfax County is currently in the planning stage for a new Bus Rapid Transit (BRT) system on Richmond Highway, Route 1 south of the City of Alexandria. A significant amount of development is planned for the areas surrounding the planned BRT stations.
- Strategy element 3: Frequent and convenient bus service is fundamental to accessing opportunity, building an equitable region, and ensuring high quality of life.
 - 3.D (proposed): This element is an opportunity to promote transit-oriented development by encouraging new residential and commercial development along high-capacity and high-frequency bus lines. This can help to address the proximity and destination elements of convenient bus service by providing more opportunities for bus travel to be the easy and obvious mode choice. To that end, a new recommendation D on page 92 that discusses the importance of land use when planning a transportation system should be added. This new recommendation D could also discuss the importance of taking the plans for future growth and development into consideration when planning for future bus service across the region.
 - As of April 2019, the Quantification and Forecasting group in the Fairfax County Department of Planning and Zoning estimated that close to 100% of future

residential growth could be accommodated in activity centers that are served by transit (both rail and bus). Language should be included in the Bus Transformation Strategy document that encourages all jurisdictions in the region to proactively focus future growth and development in areas that will be served by transit, especially bus.

- Fairfax County has been participating in an effort led by MWCOG that has been evaluating a regional approach to addressing the need to produce more housing units, and more affordable housing units in particular. This effort has had a significant amount of discussion about directing future residential growth to areas served by transit to reduce congestion and to ensure that jobs and services are easily accessible for everyone.
- Equity and Public Health: The Fairfax County Board of Supervisors and School Board have jointly adopted One Fairfax dated November 21, 2017, a joint social and racial equity policy. It commits the county and schools to intentionally consider equity when making policies or delivering programs and services.
 - There are a number of ways that the Bus Transformation Project would serve to advance the goals of equity, particularly in terms of the recommendation for a consistent reduced fare program for low-income people across jurisdictions (Strategy Element 1, Recommendation F) and using equity as a metric to measure the success of Strategy 3, Recommendation A (Develop a regional bus network plan that realigns routes to create the most efficient and customer focused bus system).
 - Equity was one of the top five goals for the region as voiced by stakeholders, but the discussion of the meaning of equity in the context of a bus system is limited. A section should be added that outlines the ways in which the Bus Transformation Project will advance the goal of equity for the region.
 - Similar to the county's Comprehensive Plan, the One Fairfax Policy calls for a healthy and quality environment for residents in which to live and work. There is a connection between health and the built environment, and staff believes that there is an opportunity for this document to highlight that connection. Goal 4 on page 22 addresses sustainable economic health and access to opportunity. There is an opportunity to add discussion about the positive impacts to human health when air quality is improved through reducing congestion. Additionally, more walkable and transit-oriented neighborhoods allow mobility for a wider spectrum of ages and physical abilities, therefore expanding access to jobs and services. This comment is further supported by the policies in the [Fairfax County Community Health Improvement Plan](#).³

³ Fairfax County Community Health Improvement Plan Priorities for Change, 2013-2018, published September 2013; <https://www.fairfaxcounty.gov/livehealthy/sites/livehealthy/files/assets/documents/pdf/chip-summary.pdf>.

Fairfax County Comprehensive Plan Guidance

The [Policy Plan Element](#) of the Fairfax County Comprehensive Plan contains a variety of objectives that support a land use pattern that encourages serving existing development with transit and further supports locating future development in areas that are served by transit. The following land use, transportation, housing, and environmental policy objectives highlight the importance of the land use-transportation connection.

Fairfax County Comprehensive Plan, 2017 Edition, Policy Plan, Land Use Element, amended through 12-04-2018; pages 5-10:

Objective 6: Fairfax County should have a land use pattern which increases transportation efficiency, encourages transit use and decreases automobile dependency.

Objective 16: Fairfax County should encourage Transit-Oriented Development (TOD) with focused growth near certain planned and existing rail transit stations as a way to create opportunities for compact pedestrian- and bicycle-friendly, neighborhood centers accessible to transit.

Appendix 11 of the Land Use element of the Policy Plan also contains specific guidance in reference to transit-oriented development.

Fairfax County Comprehensive Plan, 2017 Edition, Policy Plan, Transportation Element, amended through 3-20-2018; pages 6-12:

Objective 1: Provide for both through and local movement of people and goods via a multi-modal transportation system that provides transportation choices, reduces single-occupancy-vehicle (SOV) use and improves air quality.

Objective 2: Increase Use of Public Transportation and non-motorized transportation.

Objective 11: Ensure that land use and transportation policies are complementary.

Objective 12: Preserve land needed to accommodate planned transportation facilities.

Fairfax County Comprehensive Plan, 2017 Edition, Policy Plan, Housing, amended through 3-14-17; page 7:

Objective 5, Policy d: Promote multifamily housing for the elderly and the handicapped that is conveniently located to public transportation and community services.

Fairfax County Comprehensive Plan, 2017 Edition, Policy Plan, Environment Element, amended through 3-14-17; pages 3-4:

Objective 1: Preserve and improve air quality.

Policy a. Establish land use patterns and transportation facilities that encourage the use of public transportation and reduce trip lengths to reduce emissions of oxides of nitrogen, carbon monoxide, and hydrocarbons from automobiles. Consistent with other Land Use and Transportation objectives,

support and encourage the following during the reviews of development proposals, particularly for proposals in mixed use centers:

Policy b. Implement transportation strategies that reduce auto travel, minimize dependence on single-occupant automobiles and improve traffic flow, thereby reducing auto emissions. Consistent with other Land Use and Transportation objectives, support and encourage the following during the reviews of development proposals, particularly for proposals in mixed use centers and for development proposals with the potential to cause substantial increases in auto-related air pollutants:

One Fairfax Policy – Adopted November 21, 2017

One Fairfax is a joint social and racial equity policy of the Fairfax County Board of Supervisors and School Board. It commits the county and schools to intentionally consider equity when making policies or delivering programs and services.

It's a declaration that all residents deserve an equitable opportunity to succeed—regardless of their race, color, sex, nationality, sexual orientation, religion, disability, income or where they live.

One Fairfax Policy

IV. Areas of Focus to Promote Equity

1. "Community and economic development policies and programs that promote wealth creation and ensure fair access for all people.

11. A healthy and quality environment to live and work in that acknowledges the need to breathe clean air, to drink clean water now and for future generations.

14. A multi-modal transportation system that supports the economic growth, health, congestion mitigation, and prosperity goals of Fairfax County and provides accessible mobility solutions that are based on the principles associated with sustainability, diversity, and community health.

MVD/SSF

Distribution:

Tom Biesiadny, Director, Fairfax County Department of Transportation
Fred Selden, Director, Fairfax County Department of Planning and Zoning
Barbara Byron, Director, Office of Community Revitalization
Marianne Gardner, Planning Director, FCDPZ
Denise James, Branch Chief, Environment and Development Review Branch, FCDPZ
Karla Bruce, Chief Equity Officer, Fairfax County
Meghan Van Dam, Branch Chief, Policy and Plan Development Branch, FCDPZ
Sophia Fisher, Senior Planner, Policy



June 7, 2019

Chairman
Hon. Matthew F. Letourneau

Vice Chairman
Hon. Katie Cristol

Secretary/Treasurer
Hon. Sharon Bulova

City of Alexandria
Hon. Canek Aguirre
Hon. Elizabeth B. Bennett-Parker

Arlington County
Hon. Katie Cristol
Hon. Christian Dorsey
Hon. Libby Garvey

Fairfax County
Hon. Sharon Bulova
Hon. John C. Cook
Hon. John W. Foust
Hon. Catherine M. Hudgins
Hon. Jeffrey C. McKay

City of Fairfax
Hon. David Meyer

City of Falls Church
Hon. David F. Snyder

Loudoun County
Hon. Matthew F. Letourneau
Hon. Ron A. Meyer

Commonwealth of Virginia
Hon. Paul C. Smedberg

Virginia General Assembly

Senate
Sen. Richard H. Black
Sen. Adam Ebbin

House of Delegates
Del. David LaRock
Hon. James M. LeMunyon
Mr. M. David Skiles
Mr. Raul "Danny" Vargas

Executive Director
Katherine A. Mattice

Bus Transformation Project Team
c/o NeoNiche Strategies
4501 Ford Avenue, Suite #501
Alexandria, Virginia 22302

Re: Comments on Draft Bus Transformation Project Recommendations

Dear Bus Transformation Project Team:

The Northern Virginia Transportation Commission (NVTC) appreciates the seriousness with which the Washington Metropolitan Area Transit Authority (WMATA) has tasked the Bus Transformation Project Team to transform the region’s bus system and create a strategic framework to combat declining ridership and slower bus speeds. With over 150,000 riders on Northern Virginia’s buses every weekday, we cannot underscore the importance of a bus network to transportation in Northern Virginia. As a regional entity tasked with coordinating transit policy and funding in Northern Virginia, NVTC is supportive of the project’s effort but does share some words of caution on the strategies prepared to date.

We strongly support the study elements that seek to **prioritize buses** to make the bus system more customer focused and welcome the opportunity to support **ongoing coordination** between WMATA and jurisdictions to improve bus service in Northern Virginia. We also recommend that the project team and WMATA consider the development of a Virginia-specific roadmap for the implementation of the study.

We broadly support the study elements that seek to make the bus system more **customer focused**, provide **convenient bus service**, **streamline back-office functions** and **sharing innovation**. Many of these elements are consistent with NVTC’s [2018 Regional Fare Collection Strategic Plan](#) and policy recommendations contained in NVTC’s [2018 Annual Report on the Performance and Condition of WMATA](#). In addition, NVTC and several Northern Virginia jurisdictions are already moving forward on components of these recommendations through such projects as [Envision Route 7](#), the [transitway extension to Pentagon City](#), [Richmond Highway BRT](#), and the [Alexandria Transit Vision Plan](#).

NVTC agrees that local transit operators are better equipped to respond to local needs when **balancing the responsibilities of local and regional providers**. However, we do not see a problem with the current balance of local and regional transit providers in Northern Virginia.

Local transit service across the region intentionally serves multiple purposes, whether it is to serve as a catalyst for economic development, to connect the most vulnerable to services and opportunities, or to efficiently move commuters to work every day. Essentially, bus service across the entire Washington, DC region is not a one-size-fits-all endeavor.

Northern Virginia localities have already voluntarily and gradually established bus services that reflect the priorities of their communities and rebalanced the responsibilities of local and regional providers over the last two decades. While we do respect the desire of individual jurisdictions to engage with WMATA on jurisdiction-specific delivery of service, given our experience, we do not see the need to significantly alter the policy framework around the role of Metrobus in Virginia.

We are also concerned that WMATA may see the rebalancing of local and regional provision of transit as a means to satisfy the three percent operating cap (imposed by the Virginia dedicated funding legislation) by simply moving the cost of service from one side of the ledger to the other instead of making fundamental changes to WMATA's unsustainable cost structure. We urge WMATA to engage with NVTC, the jurisdictions, and transit operators to ensure that any changes to how bus service is provided does no harm to our localities and ensures that jurisdictions' investment in WMATA-provided service is commensurate with the level of service being provided.

NVTC is the voice of transit in Northern Virginia and works closely with member jurisdictions and transit providers. We encourage the region's leaders to empower existing organizations and structures, including NVTC, in transforming or incorporating changes in bus service in the region and in Northern Virginia.

NVTC shares the goal of an affordable, reliable, equitable, and financially sustainable bus system that connects the region. Thank you for the opportunity to comment and we look forward to additional engagement in the study process.

Best regards,

A handwritten signature in blue ink that reads "Matt Letourneau".

Matthew F. Letourneau
Chairman

cc: Shyam Kannan, WMATA
Allison Davis, WMATA



DEPARTMENT OF TRANSPORTATION

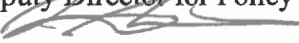
Marc Elrich
County Executive

Al R. Roshdiah
Director

MEMORANDUM

June 12, 2019

TO: Alison Davis, Project Manager
Washington Metropolitan Area Transit Authority

FROM: Christopher Conklin, P.E., Deputy Director for Policy
Department of Transportation 

SUBJECT: Comments on Draft Bus Transformation Strategy

Thank you for the opportunity to review and comment on the Draft Bus Transformation Strategy. We thank the Washington Metropolitan Area Transit Authority (WMATA) for beginning a conversation about the future of bus service in this region. Montgomery County has been working hard over the last several years to transform our own bus operations and to implement creative ideas to better match the services we provide with the needs of our community. We agree that improving the performance of our bus system and the increasing the return on investment in these systems is important for moving the region forward.

Many of the recommended elements of the strategy are valuable and important steps to take to make our systems more effective and to make them easier for travelers to use and we support these recommendations. We also feel that some of the recommendations are unlikely to deliver significant benefits and need to be reconsidered. The element of the plan related to reorganizing the delivery of bus services within the region does not, in our opinion, contribute directly to transformation and raises significant institutional questions that are not adequately addressed. Finally, we feel that the scope of the strategy is too limited. The effort does not address how the bus system will need to grow and adapt to meet the future needs of the region, does not address the substantial and critical commuter bus operations in the region, does not effectively address paratransit, and does not incorporate or reference the operations adjacent to the WMATA service area (Potomac and Rappahannock Transportation Commission (PRTC), Regional Transportation Agency of Central Maryland, etc.).

The remainder of this memorandum provides our detailed comments on the Draft Strategy. Thank you again and please feel free to let us know if our comments need clarification or if additional follow-up is warranted.

Office of the Director

101 Monroe Street, 10th Floor • Rockville, Maryland 20850 • 240-777-7170 • 240-777-7178 Fax
www.montgomerycountymd.gov/mcdot

Introductory Materials

(Pages 4 – 8) We support the objective to improve the function, perception and efficiency of bus service in the region.

(Page 10) The statements regarding the current state of the transit system are exaggerated to the negative. This exaggeration undermines the substantial efforts across the region to provide quality service and to encourage use of transit. For example, many customers choose to use bus services and do not view them as a “last resort”. The system is not “disjointed” as services are closely coordinated. There is not major “overlap”, as each operator looks to make sure services are productive. The region is not “divided” as fare programs are integrated across jurisdictions, as an example. The final strategy should more fairly characterize the existing system.

(Page 14) The strategy does not fulfill its vision by ignoring commuter bus and paratransit. Also, note that the metro-Washington region does not have the same geographical limits as the WMATA-compact. Not including major systems in the rest of the region is a serious limitation of this strategy.

(Page 20) The sidebar that states the strategy is a “collective effort” is overstated. The work product is that of WMATA and its consulting team. Although there has been engagement during the study, only once a draft strategy was complete, was detailed input on the work product been sought.

(Page 21) We support this vision. We suggest the strategy touch on how the need for bus transformation is reinforced as the region needs to accommodate significant growth in population over the coming decades.

1) Customer-Focused Bus System

A: We agree that transit is under-marketed in this region and support efforts to expand marketing and communications about transit. The strategy should identify a “target” annual marketing level of effort in terms of percent-of-operating-cost. A marketing budget of 2 to 3 percent could be a starting point.

B: Conveying information to customers is important. However, it is not clear that maps, as described, will be of great significance to customers in the future. Route naming may be a more significant issue with alpha-numeric route designations being challenging for new riders in particular.

C: A consistent mobile application for travel by transit around the region would be very helpful. Coordinating the activities of individual operations to achieve this objective could be a high-priority recommendation for the strategy.

D: If Element C is achieved, it does not seem essential that Element D be included. These fare programs are important to local policy makers.

E: Regional pass products could be a valuable element of the strategy.

F: Regional reduced fare programs could be a valuable element of the strategy.

G: Free transfers could be a valuable element of the strategy. Understanding the financial implications of this measure and the mechanism for implementing this approach are essential to determine its viability. For example, does the rail system or the bus system absorb the revenue loss?

H: Increasing regional employer incentives could be a valuable element of the strategy.

I: Safe, convenient and accessible bus stops are important, but they are currently a local responsibility. It is unclear what regional initiative is implied by this element.

J: This is occurring naturally in each system at differing rates. What regional activity is proposed?

2) **Prioritizing Buses on Major Roads**

(Page 74) The context section says that bus priority is being implemented in a de-centralized fashion rather than taking an integrated regional approach. It seems like de-centralized is represented as a problem without any substantiation of why a regional approach would be better or how it would be achieved. Given the complex jurisdictions in this region, de-centralized might result in more achievement in a shorter time.

A & B: Improving bus speeds will help to provide a more reliable service and increase ridership. Bus prioritization is a part of our adopted plans. Despite Montgomery County's enthusiasm for bus prioritization, it seems unlikely that the recommended approach will prevail on a regional basis. The strongest recommendation in this section is to incentivize implementation of bus priority through a regional funding program based on bus priority criteria. The criteria need to allow for variations within the transportation network (e.g. grid network vs. radial arterials) in addition to variations between jurisdictions (e.g. mix of state and local control of roadways). This program could be implemented as a competitive regional grant program.

C: Enforcement programs will need to be inherently local due to law enforcement jurisdiction and state laws. Efforts such as a "model code" could aid the legislatures in adopting consistent laws for enforcement. It is unlikely that regional police force, like Metro Police, will have sufficient resources to enforce bus priority systemwide.

D: Incentives will be necessary in order for this to become a regular and routine part of overall enforcement activities.

E: This is another example of where “model code” might help advance these programs in individual jurisdictions. It may also be useful to pilot some of these ideas in sub areas around the region.

3) **Convenient Bus Service**

In the context section, it states “Planning for bus service does not occur regionally”. There is a role for regional bus planning, particular for commuter services and for the integration of regional services. The strategy does not provide evidence that regional planning for all bus services will yield better results for local passengers than coordinated local planning.

A: A regional bus network realignment may be warranted. This analysis must include services operated by MTA, PRTC and others. With a regional framework in place, it may be more appropriate for local jurisdictions to plan for their operations to complement the regional network.

B: The strategy must recognize that some services are provided for policy reasons, rather than data driven analysis about supply and demand.

C: It is possible that flex and other on-demand services will play an increasing role in the bus network. We support exploring options to provide different types of services and sharing results with other regional providers to see what works best.

4) **Balancing Regional Provider Responsibilities**

This element of the strategy does not seem transformational. We have serious concerns about the implications of this element on local providers’ ability to meet customer expectations and the long-term sustainability of locally-operated transit. In the context section, it states that WMATA is operating routes that it may not be in the best position to operate. This statement is problematic in that WMATA is the agency with the facilities, fleet and budget to operate the services it currently operates. These resources have been accumulated through decades of regional funding to WMATA so that it has the resources to provide these services. No other agency is similarly positioned to operate these services.

A. As a general statement, it is logical that WMATA’s core focus should be operating regional routes. It is not clear that the formulation of factors used is the best way to categorize regional and non-regional services.

B. It is not obvious that any of these changes will result in improvements to bus service. Much more information on the benefits of this element are needed to start this conversation. It appears that this strategy is focused on shifting a budget shortfall off WMATA's balance sheet and little else. Additionally, it does not appear to address short- and long-range service plans for BRT in place in Montgomery, Fairfax, Arlington and the District. Also, the analysis seems to show a significant subsidy shift from Virginia to Maryland. Generally, shifting operations to localities must be accompanied by shifting resources proportionally. Such a shift in Maryland will require a long-term commitment by the State to fund local transit operations at a much higher subsidy level and may require legislative changes to the State-code provisions related to WMATA funding. It is not possible to support this element of the strategy absent far more detailed information. Currently, it seems like many complicated transactions to achieve an outcome that has nothing to do with provision of better service.

C: If Element B is adopted, a 10-year plan seems far too long for bus operations to be in limbo. From a regional perspective, it is hard to understand a budgetary reason to transfer any locally-operated route to WMATA. For example, page 144 illustrates the regional savings by transferring WMATA bus operations to local operators and, if one follows this analysis to a further conclusion, the regional savings would be maximized if all WMATA services were transferred to other operations. WMATA should clarify what it means by "contracting out" in this plan. It is assumed to mean that WMATA will operate the service under contract to a local jurisdiction. What role does WMATA want to play going forward? Should the agency just be a contract-operator of services for the region?

5) Optimize Back-Office Functions

The strategy suggests that there are substantial benefits to be realized by consolidating support functions. This may be theoretically true, however, we do not think many of these benefits are likely to be realized due to the tri-state nature of the nature and statutory requirements within each locality.

A. Since the local jurisdictions back office functions are usually pooled with other local functions, it likely that "consolidating" back office functions will result in higher costs and longer timelines for actions since local jurisdictions will continue to have the vast majority of these functions in house and will need to demonstrate the "consolidated" organization is meeting all the local requirements. However, customer service is an area where a regional approach might be helpful, particularly considering the recommendations in Element 2 of the strategy.

B. Innovation is occurring at the local level and at WMATA. It is unclear how centralizing "innovation" will increase innovation. It may be better to emphasize and encouraging innovation by all operators. For example, an innovation challenge grant fund could be established to allow local experimentation. Additionally, tools to share

lessons-learned from local innovation could be valuable. The innovation lab concept could meet these needs, but it is important to keep innovation at the grass-roots level and not to create a regional bureaucracy that could hinder innovation.

C: Regional data sharing seems like a good idea. The standards should likely build from the NTD, MWCOG, SmarTrip and other established data management structures. All data sharing should be reciprocal.

6) Regional Steward to Transform the Bus System

A: It is not clear that another regional organization needs to be established regarding bus service. The Washington-region has an abundance of transportation entities as illustrated in the context section for this recommendation. More prudently, an existing organization should be empowered to advance this strategy. In particular, decision-making authority is unlikely to be vested in a new unelected body covering Maryland, Virginia and the District of Columbia. Additionally, funding authority is likely to be limited ideas like the bus prioritization grant program and the innovation grant program described in these comments. MWCOG may be the most appropriate body to serve in this role given established arrangements with the states and municipalities for, and experience running, programs like the Transportation and Land Use Connections (TLC) grant program. If the plan is suggesting that an empowered regional entity be established, it should propose which authorities would be ceded by the states and local governments and the governance structure of such a group.

B: Aside from WMATA, most transportation agencies are accountable to elected officials. It is more important to establish a transit priority through policy within local and state governments and to reinforce implementation of the plans through budget actions and legislation. Prioritization of the strategy will be determined by elected officials. It will be ineffective to try to hold agency officials accountable for decisions that are beyond their authority.

C: Tracking results for the strategy is a good idea. The MWCOG Transportation Planning Board is well-suited to this activity. An annual scorecard may be a good approach.

Should you have any questions regarding our comments on the plan, please feel free to contact me or Mr. Gary Erenrich, at 240-777-7156.

cc: Al Roshdieh, MCDOT
Gary Erenrich, MCDOT
Dan Hibbert, MCDOT
Phil McLaughlin, MCDOT

Government of the District of Columbia

Department of Transportation



d. Office of the Director

June 17, 2019
Shyam Kannan
Vice President of Planning
Washington Metropolitan Area Transit Authority (WMATA)
600 5th Street NW
Washington, DC 20001

Subject: District of Columbia's Comments on the Bus Transformation Project

Dear Mr. Kannan:

Thank you for taking on the commendable effort to improve bus transit in the region by initiating the Bus Transformation Project. We appreciate the opportunity to participate and comment on the study as members of the Strategic Advisory Panel and Technical Team. The following comments reflect DDOT's position on the recommendations presented in the Draft Report. DDOT broadly supports the vision and goals for the study. Specific comments for each strategy are below:

Strategy 1: The bus system should be customer focused and an easy-to-use option that people want to ride.

DDOT supports the recommendations in the study to make the regional bus network easier to use and understand, such as establishing a consistent route naming convention across all operators in the region. DDOT supports the creation of a low-income fare product and the elimination of the \$1.50 cost to transfer between bus and rail which would allow both modes to work together as one network. Our region stands nearly alone in having this high barrier to multi-modal mobility, and we are ready to participate in discussions among WMATA and its jurisdictional funding partners to determine how this relatively expensive but positive action could take place. DDOT also strongly recommends the rapid adoption and deployment of technology, such as mobile fare payment that can be integrated across modes including taxis and Capital Bikeshare well as real-time service information.

In addition to the recommendations in the study, DDOT would like to bring to WMATA's attention that inadequate resources have been devoted to marketing and customer service for WMATA bus service, which carries roughly 35-40 percent of all weekday transit riders in the region, when compared with Metrorail service. Bus transit cannot overcome decades of stigmatization as a need-based service for transit-dependent riders as opposed to being a transit service of choice unless WMATA (and the region) begins to treat Metrorail and Metrobus services with similar attention to branding and advertising.

Strategy 2: Prioritizing buses on major roads moves the most people in the quickest, most reliable and fiscally-responsible way.

DDOT supports the recommendations to prioritize buses on roadways and has been actively partnering with WMATA to implement bus lanes, transit signal priority (TSP) and queue jumps for buses in the region. DDOT's FY 2021 budget also includes a proposal for congestion pricing, and DDOT is supportive of managing and prioritizing curb access including bus layover space, as well as parking limitations. However, it should be noted that there are significant challenges to achieving this goal. These include the availability of bus garages and maintenance facilities within the District to prevent wasteful deadheading of buses, layover space in downtown locations, and uncertain political will and public opinion when it comes to prioritizing bus service alongside other modes of transportation.

Strategy 3: Frequent, reliable, and convenient bus service is fundamental to offering equitable access to opportunities and improving quality of life across the region.

DDOT agrees with the recommendation to realign routes to create the most efficient and customer-focused bus system. Although the District, through DDOT's Bus Priority Program, is developing guidelines and thresholds that prioritize investment in roadway infrastructure for bus transit in the District, we believe that the recommendation for adopting consistent regional guidelines for the numerous jurisdictions in the WMATA Compact is unrealistic. Compact jurisdictions vary in their land use characteristics, population and employment densities, and reporting requirements to different stakeholders. Further, WMATA already has service standards to measure bus productivity that have been approved by the WMATA Board, and DDOT is requesting formally through this comment letter that instead of creating new guidelines, WMATA resume their annual reporting on bus productivity measures that has been discontinued since 2015.

DDOT agrees with the study's finding that portions of the region have low land use and population density which results in low bus ridership. Specifically, the study notes that 79 unidentified routes in the region costing \$60 million annually have very low ridership. These routes should be considered for discontinuation and modification to improve performance with any savings in resources reallocated to bus routes that are overcrowded or to the initiation of new bus routes to serve growing markets. We support the recommendation that flexible, on-demand transit services with lower operating costs than traditional fixed-route service could replace buses at the same cost to customers and DDOT has begun to develop pilot microtransit alternatives for the District. DDOT recommends that these flexible, on-demand transit services should be ADA-compliant to avoid the loss of service area for MetroAccess and other federally-mandated paratransit.

Strategy 4: Balancing the responsibilities of local and regional providers will position local bus systems to meet their own jurisdictional needs and the regional bus system to meet regional needs and deliver regional benefits.

The study recommends a large transfer of local bus routes from Metrobus to local providers like the DC Circulator. DDOT is amenable to begin preliminary discussions to explore the benefits and disadvantages of this transfer in service, as well as impacts to capital and operating funding allocations, rolling stock, maintenance facilities, operator contracts, etc. However, we note that the potential impacts would be significant for all jurisdictions, and we are not prepared to endorse this strategy until a full accounting of costs and benefits resulting from any such transfer can be developed. Further, DDOT believes that the proposed 10-year timeframe for this transfer is too ambitious given the numerous considerations listed above. Finally, although the time may be ripe for a reconsideration of the criteria by which "regional" and "non-regional" routes are

defined, further discussion is necessary before the specific redefinitions proposed in the draft report can be endorsed.

Strategy 5: Optimize back-office functions and sharing innovation will help all operators and will allow more resources for operating bus services.

DDOT agrees that consolidation of back-office functions will generate cost savings due to economies of scale and consistency in a range of back-office functions from customer service to procurement and maintenance of rolling stock. We are willing to begin conversations with WMATA and other Compact jurisdictions to advance this strategy further.

The study also proposes the creation of a Regional Mobility Lab. DDOT is unsure what function the proposed organization would serve that is not currently being served by regional jurisdictions, bus systems, and the Metropolitan Washington Council of Government (MWCOC). DDOT believes that MWCOC could take on this role of furthering regional innovation for bus transit, coordination on collecting and sharing productivity metrics from the various bus providers in the region.

Strategy 6: Customers in a region with multiple bus providers need a regional steward to transform the bus system.

DDOT supports the creation of a task force for coordinating between jurisdictions and their leaders and moving forward the recommendations of the study. However the recommendation to create a new regional steward is problematic given that WMATA is the current steward for the region's bus system. A new bureaucratic organization with no control over local roadways would have very little authority or ability to implement many of the recommendations outlined in the study. Also, the recommendation to hold transportation and transit agencies accountable for prioritizing bus cannot really be enforced when each agency answers to a different funder, Board or Council.

We understand that the Bus Transformation Project's Draft Report will be presented to the WMATA Board on July 25. We would like these comments entered into the public record at that hearing. Thank you for the opportunity to review and comment. We look forward to working with you to move the region towards improved and reliable bus service.

Sincerely,



Jeffrey Marootian
Director



Alexandria Transportation Commission
301 King Street
Alexandria, VA 22314

www.alexandriava.gov

Phone: 703.746.4025

Bus Transformation Project Team
c/o NeoNiche Strategies
4501 Ford Avenue Suite #501
Alexandria, VA 22302

June 19, 2019

Re: Bus Transformation Project Strategy Feedback

Dear Bus Transformation Project Team:

On behalf of the Alexandria Transportation Commission, I am writing to you to express the Commission's support of the City of Alexandria and the Alexandria Transit Company's joint letter dated June 5, 2019 to the project team, and to emphasize the importance of Strategy 1 in making the bus system the mode of choice in the region by 2030.

In particular, the Transportation Commission discussed the importance of considering the needs of all current and future riders in making the bus easier to use. Making the bus the transportation mode of choice is of paramount importance. While flexible and user-friendly fare payment options (e.g., app based payment options) and marketing strategies to increase public awareness of bus transportation options are important, consideration should also be given to the configuration of the bus itself. There are opportunities to meet the needs of riders who may be trying to live car free or who may not be able to use alternative modes. Consideration should be given to the needs of riders who have children, strollers, groceries or other belongings in addition to persons with a range of incomes and abilities will ensure that everyone can benefit from a faster, more reliable, and better integrated bus system.

The Transportation Commission was created by Council to advocate and promote the development of balanced transportation systems in the City through oversight of the Transportation Master Plan, which seeks to ensure that people can travel into, within and out of the City of Alexandria by providing transportation choices that combine different modes of travel into a seamless, comprehensive and coordinated transportation system.

We commend the project team's efforts to make the bus a better mode of travel in a manner well aligned with the goals and principles of the City's Transportation Master Plan and thank you for this opportunity to provide feedback.

Sincerely,



S.J. Klejst
Chair, Alexandria Transportation Commission

cc: Alexandria Transportation Commission
City Manager Mark Jinks
Yon Lambert, Director, T&ES
Hillary Orr, Deputy Director, T&ES