Writer	Comment
Nathan Vosburg, Mayor, City of Coalinga	7. Fix the Transit Allocation Imbalance (70% FAX) AND Create Flexible Mobility Options for Small Cities Based on Demonstrated Inefficiencies (Including Coalinga's Data)
9	Recommended Fix
	Adjust the transit allocation to:
	FAX: 55–60%
	FCRTA: 25–30%
	Clovis: 10–15%
	This restores fairness and ensures rural cities receive a greater share of the transit dollars they contribute.
	Flexible Mobility Options for Small Cities (Population < 35,000)
	A. Local Fixed-Route Circulator (Optional)
	B. On-Demand Microtransit
	C. Transit Vouchers & Mobility Subsidies
	D. Workforce Transportation & Vanpools
	E. Transit-Supportive Infrastructure
	F. Carshare / EV Carshare / Shared Fleet Programs
	"Cities under 25,000 population may use their proportionate share of Public Transportation Program funding for microtransit, on-demand service, local fixed-route circulators, transit-
	supportive infrastructure, mobility vouchers, carshare programs, workforce transportation, vanpools, or any flexible mobility solution that meets local needs. The fixed transit allocation
	formula (70/20/10) shall be modified to ensure rural communities receive an equitable share of transit funding proportional to their needs and service realities."
Bethany Berube, Clovis Transit	For the metric: "Increased public transportation ridership by 2047"
	Each agency should be measured against its own ridership baseline, not against one another.
	Performance metrics
	Passengers per revenue hour, and
	Passengers per revenue mile
	Ridership growth depends almost entirely on costly factors such as increasing frequency, span, low cost or no cost fares. This requires more service, but Measure C funding is fixed.
5.1. 5.1. 61.1.7. 11	For the metric: "For the metric: "15-minute frequencies in urban areas""
Bethany Berube, Clovis Transit	This metric should be interpreted as requiring high-frequency service on key urban corridors—not every Clovis Transit route. This needs to be clearly defined.
	Example Definition: "15-minute frequency applies to designated high-demand routes, not every route. Operators define these priority routes based on ridership, density, and operational
	feasibility."
Greg Barfield, FAX	15-minute frequencies in urban areas as warranted by ridership, demand or need.
	For the metric: "For rural areas, comparable travel times to personal vehicle use"
	For rural areas public transit cannot achieve comparable travel times to personal vehicle use due to long distance of a route, time for bus stops, wheel chair passengers, individuals with
Janelle Del Campo, FCRTA	mobility devices, passengers with bikes
Jeffery Martin, County of Fresno	Not attainable. Policy objectives can be stated, but ridership cannot be increased in rural areas to justify the level of service needed to support this as a realistic metric.

Bethany Berube, Clovis Transit	For the metric: "Enhance accessibility by reducing the average distance or time it takes to get to a bus stop"  Clovis needs clear guidance on how this distance will be calculated and must be allowed to account for locations where new stops cannot be safely or feasibly installed.  Adding stops increases trip time which contradicts Metric 8.
Bethany Berube, Clovis Transit	For the metric: "Increase in microtransit and on-demand transit services across the county"  We support microtransit as long as Clovis can define the service parameters and locations. That includes limiting the service area and using it as a connector or feeder to our fixed-route system rather than expanding into a full countywide model we can't sustain.  This could reduce funding available for frequency (Metric 2).
Greg Barfield, FAX	1. Increase in microtransit and on-demand transit services across the county as studied by each transit provider.
Janelle Del Campo, FCRTA	There have been studies completed and demo microtransit projects that have been unsuccessful and doing microtransit countywide is unsustainable. FCRTA supports microtransit with designated areas but it may not be cost effective.
Bethany Berube, Clovis Transit	For the metric: "Enhance reliability and efficiency by improving on-time performance, measured by the percentage of trips that run on schedule" Clarification that our headway-based system can use headway adherence (bunching/gap indicators).
Bethany Berube, Clovis Transit	For the metric: "Reduce travel time by reducing the average trip duration "  Clarification on how "average trip duration" will be defined (entire in-vehicle trip, door-to-door, or origin–destination).  Confirm that service redesigns already implemented can count as early progress toward this metric.
Janelle Del Campo	In rural areas the trip duration cannot be reduced due to the high mileage traveled.
Bethany Berube	For the metric: "Improve public transit-supportive infrastructure by increasing the number of bus stops that meet ADA accessibility standards"  Federal and state law already require ADA access, but some systems have existing stops that may not fully meet current standards (pads, slopes, paths of travel, etc.).  Clarify whether improvements at a group of key stops (rather than every single stop) will be recognized as meaningful progress.
Greg Barfield, FAX	Improve public transit-supportive infrastructure by increasing the number of bus stops that meet ADA accessibility standards as required by local, state and federal law assuming right a away is available to support.
	For the metric: "Increase the proportion of multimodal access points that are ADA compliant and increase bicycle, sidewalk, and pedestrian facilities infrastructure leading to bus stops"
Bethany Berube, Clovis Transit	Metric 10 belongs under Streets & Roads and Active Transportation, not Transit. Transit cannot absorb these capital obligations without losing the funding needed for service delivery.
Greg Barfield, FAX	Increase the proportion of multimodal access points that are ADA compliant as required by local, state and federal laws where possible, and increase bicycle, sidewalk, and pedestrian facilities infrastructure leading to bus stops working with public works department(s) of area jurisdictions to add to public works projects.
Janelle Del Campo, FCRTA	This metric should be moved to another category, public transit should not be responsible for infrastructure such as curb, gutter and sidewalk.
Bethany Berube, Clovis Transit	For the metric:"Increase accessibility of schools, population centers, employment centers, and other services with multiple modes of transportation"  Clovis already provides direct and frequent access to schools, employment centers, medical sites, and community destinations. Metric 11 should recognize existing accessibility, not assume deficiencies or require unnecessary route expansion. Any measurement must account for systems that already meet this standard.
Janelle Del Campo	FCRTA makes a good faith effort to provide service to places such as schools but there also needs to be willing partnerships so the transit agency does not have to absorb all the costs.  The CHP motor carrier division has regulations on public transit providing school transportation.

Bethany Berube, Clovis Transit	For the metric: "Maintain and expand transit services and programs for those with special needs – students, veterans and active military seniors, and persons with disabilities, and low-income populations"  Clarify whether this metric is mostly qualitative (no net reduction in access) or tied to specific quantitative thresholds (ridership, coverage, hours).  Clarify how "low-income populations" will be identified (Census tracts, equity maps, etc.).
Bethany Berube, Clovis Transit	For the metric: "Increased participation of community residents, representative of Fresno County's geographic and demographic characteristics"  Clarify what counts as sufficient participation.  Clarify how representativeness will be assessed (demographic data, ZIP codes, etc.), especially where sample sizes are small.
Greg Barfield, FAX	Increased participation of community residents, representative of Fresno County's geographic and demographic characteristics following federal Title VI reporting and documentation and language(s) of study area(s).
Greg Barfield, FAX	Each of the three public transportation providers will receive an annual allocation of Measure C Renewal funding for supporting and improving public transit services. Fresno COG will receive periodic funding to update the Short Term (2-5 years) and Regional Long-Range Transit Plans up to 30 years out.
Greg Barfield, FAX	By January 1, 2030, each public transportation agency shall have developed and adopted an <u>updated Short Range</u> service plan <u>covering the next 2-5 years</u> , that promotes system connectivity and accessibility, closes service gaps, and improves and <u>may add expanded</u> service levels <u>based on needs</u> .  1. Each public transportation agency is required to engage members of the public, host public meetings, and allow for public review and comment prior to plan adoption. The final plan must explicitly address how community input was integrated in the final plan <u>as seen and reported in a Title VI evaluation study</u> .
Greg Barfield, FAX	Urban and rural public transportation operators are required by California State law under the Transportation Development Act, (TDA), to undergo performance audits every three years.
Greg Barfield, FAX	Under performance measures Safety and Security Events (including major vs minor incidents, Passenger Assaults and Employee Assaults ) New measurement for larger transit agencies in 2024 moving to all in the future years.
	To ensure development of quality performance measures for public transportation, it is envisioned that a <i>Measure C Transit Subcommittee</i> with technical support of staff from the urban and rural transit agencies along with, Fresno COG will be formed to assist review and share in the development of performance measures.  Look at using the SSTAC of COG with an expanded focus for the Measure C Transit Subcommittee.
Greg Barfield, FAX	Under Funding Allocations Public transit supportive infrastructure such as: ADA infrastructure, sheltered and weather protective bus stops; lighting at bus stops; , trash disposal, ; enhanced pedestrian and bicycle facilities that improve access to transit stops; optimized traffic signals to optimize for smoother traffic flow; investments in modern vehicles and technology like real time tracking and audible announcements for passengers. At main hubs and transit centers where possible consider water stations and public restrooms
Bethany Berube, Clovis Transit	Before Measure C funds are allocated to public transportation agencies within Fresno County, the Authority must ensure sufficient revenues are available for continued support for paratransit door-to-door van, taxi, and other transportation services for seniors (62 years old and older), veterans, and people with disabilities who are unable to use fixed route transit service. Includes operations support, replacement of accessible vans, and replacement and upgrades of supporting equipment  This does not define "enough" and is a condition before allocating the funds. Clarification about what constitutes enough and how it will be determined.
Janelle Del Campo, FCRTA	Programs such as taxi and senior scrip should continue to be administered and operated by the FCOG to continue a countywide program, transit operators should focus on enhancing their existing public transit services only.
Greg Barfield, FAX	Are we talking ensuring state and federal funds are avaliable for operations??
Erin Haagenson, County of Fresno	If State law in the future prohibits the use of TDA for road purposes, changes to the transit allocation need to be made at that time, perhaps the 10 year mark for revisiting allocations in the measure.

#### **Under Requirements**

Bethany Berube, Clovis Transit

Administration of countywide mobility programs such as Taxi Scrip should remain with FCOG. Transit operators should not be required to administer or fund these programs as they would divert limited resources away from core service delivery.

Guidelines should explicitly state that each agency maintains authority over its own route structure, service design, and operational decisions, with coordination intended to enhance mobility rather than modify local control.

#### **Under Examples of Eligible Projects**

Greg Barfield, FAX

Revenue service Fleet conversion by 2040 as required by the State of California's Innovative Clean Transit (ICT) regulations

Assistance in Expanded Senior Scrip program to include seniors 62 years and older and people with disabilities with COG staff Maintenance, Administrative and Customer Service facilities maintenance, upkeep and facilities expansion.

Match of up to 20% for any local, state or federal grants.

Dr. Amber Crowell, Center for Community Voices

Low-cost, zero-fares should be under the Access and Innovation category
Carpool/Vanpool programs should be listed under Public Transportation category, not Access and Innovation

### **Under Clear Timelines for Oversight and Reporting**

Susana Ledezma Camacho, City of Orange Cove

To maintain trust, the program has built-in review points ...:

What will be the time line for the review of the individual jurisdiction's financial audits? Will compliance/non-compliance notices be delivered to each jurisdiction within 30 business days?

When will the reports be due? At the end of a Jurisdiction's fiscal year, End of the Year, December 31?

Is there a specific format requirement? PDF, hard copy, etc?

Suggestion to change this to every 2 years for smaller Cities. Many small cities like Orange Cove have limited staff and funds to prepare the data needed for the report. Orange Cove will most likely need to hire Consultants to complete this task, that alone adds additional time spent in preparation for RFPs, Finalizing a contract, etc.