



COUNCIL OF SAN BENITO COUNTY GOVERNMENTS
SOCIAL SERVICES TRANSPORTATION
ADVISORY COUNCIL
SPECIAL MEETING AGENDA

DATE: Tuesday, May 7, 2024
2:00 p.m.

LOCATION: Council of San Benito County Governments
Conference Room
330 Tres Pinos Road, Suite C7
Hollister, CA 95023

MEMBERS: Leona Medearis-Peacher, Chair
Paulette Cobb, Vice-Chair
Clay Kempf
Connie Padron
Joshua Mercier
Maria Magaña
Stacey Romo

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1. Call to Order and Introductions
 2. Verification of Certificate of Posting
 3. Member Announcements

ACTION ITEMS:

4. 2024 Unmet Transit Needs Report – Kean
 - a. COMMENT on the Public Feedback Received During the 2024 Unmet Transit Needs Process.
 - b. RECOMMEND to the SBCOG Board the Unmet Transit Needs Found Reasonable to Meet for Implementation in Fiscal Year 2024/2025 by the Local Transportation Authority.

Adjourn to Regular Meeting of June 28, 2024

In compliance with the Americans with Disabilities Act (ADA), if requested, the Agenda can be made available in appropriate alternative formats to persons with a disability. If an individual wishes to request an alternative agenda format, please contact the Clerk of the Council four (4) days prior to the meeting at (831) 637-7665. The Council of Governments Board of Directors meeting facility is accessible to persons with disabilities. If you need special assistance to participate in this meeting, please contact the Clerk of the Board's office at (831) 637-7665 at least 48 hours before the meeting to enable the Council of Governments to make reasonable arrangements to ensure accessibility.

Council of San Benito County Governments (COG)

Local Transportation Authority • Airport Land Use Commission • Service Authority for Freeways & Expressways
330 Tres Pinos Road, Suite C7 • Hollister, CA 95023 • Phone: 831-637-7665
sanbenitocog.org

CERTIFICATE OF POSTING

Pursuant to Government Code Section #54954.2(a) the Special Meeting Agenda for the Council of San Benito County Governments Social Services Transportation Advisory Council on **May 7, 2024**, at **2:00 p.m.** was posted at the following locations freely accessible to the public:

The front entrance of the San Benito County Administration Building, 481 Fourth Street, Hollister, CA 95023, and the Council of Governments Office, 330 Tres Pinos Road, Suite C-7, Hollister, CA 95023, at the following date and time:

On the 3rd day of May 2024, on or before 5:00 p.m.

The meeting agenda was also posted on the Council of San Benito County Governments website, www.sanbenitoco.gov, under Meetings, SSTAC, 2024 Meeting Schedule.

I, Monica Gomez, swear under penalty of perjury that the foregoing is true and correct.

BY:

A handwritten signature in blue ink that reads "Monica Gomez". The signature is written over a horizontal line.

Monica Gomez, Secretary II
Council of San Benito County Governments



STAFF REPORT

Action

Prepared By: Douglas Kean, Transportation Planner

Subject: 2024 Unmet Transit Needs Report

Agenda Item No. 4

Approved By: Binu Abraham, Executive Director

Meeting Date: May 7, 2024

Recommendation:

1. COMMENT on the Public Feedback Received During the 2024 Unmet Transit Needs Process.
2. RECOMMEND to the SBCOG Board the Unmet Transit Needs Found Reasonable to Meet for Implementation in Fiscal Year 2024/2025 by the Local Transportation Authority.

Summary:

The Council of San Benito County Governments (SBCOG) conducts an Unmet Transit Needs hearing every year to provide a forum for residents, transit users, and community members to comment on the local bus service.

Background/ Discussion:

The Council of San Benito County Governments (SBCOG) is responsible for allocating Transportation Development Act funds for public transportation services within the San Benito region. Each year, the Unmet Transit Needs process is carried out to identify and evaluate any potential needs that are not being met through existing public transit services.

The Unmet Transit Need process consists of the following three key steps:

1. SBCOG staff solicits testimony from the public on the Unmet Transit Needs of the community. A public hearing on the Unmet Transit Needs was held by the SBCOG Board at their regularly scheduled meeting of Thursday, March 21, 2024, at 4:00 p.m. Opportunity for submittal of public comment was provided through the following options: public hearing, email, social media, telephone, letter, online survey, and by comment cards made available onboard all transit buses. SBCOG received a total of 44 comments from the public.
2. SBCOG staff must then analyze the Unmet Transit Needs expressed by the public, in accordance with SBCOG adopted definition of an Unmet Transit Need and Reasonable to Meet criterion (Attachment 1). All comments received are discussed with the Social Services Transportation Advisory Council (SSTAC), which provides feedback and recommendations to the SBCOG Board of Directors on the Unmet Transit Needs of the community. SBCOG staff has prepared responses to all comments received for review and feedback from the Social Services

Transportation Advisory Council (Attachment 2). The purpose of SSTAC is to review the input of transit-dependent and transit disadvantaged persons, including the elderly, persons with disabilities, low-income persons, and youths regarding transit needs in San Benito County.

3. The SBCOG Board of Directors then adopts Unmet Transit Needs Report, which includes all comments received and identifies which Unmet Transit Needs were classified as Reasonable to Meet for implementation in the upcoming fiscal year by the Local Transportation Authority.

The draft Unmet Transit Needs Report will be presented to the SBCOG Board at their April and May 2024 meeting for comment. The final report will be considered by the Board for adoption at their June meeting. The final report is then submitted to Caltrans by the August 15, 2024 deadline.

Financial Impact:

There are no financial impact.

Attachments:

1. Unmet Transit Needs and “Reasonable to Meet” Criteria
2. 2024 Public Comments and SBCOG Responses

ADOPTED DEFINITIONS AND PROCEDURES FOR NOTICING AND CONDUCTING THE ANNUAL UNMET TRANSIT NEEDS HEARING



As required by PUC section 9940 1.5, the Council of San Benito County Governments must adopt formal definitions of "unmet transit need" and "reasonable to meet." The first definition is the primary tool used to evaluate the public testimony received during the initial hearing.

The second definition is used to evaluate the reasonableness of meeting those requests. State law (PUC Section 994015(c)) has been modified to clarify that..."the fact that an identified transit need cannot fully be met based on available resources shall not be the sole reason for finding that a transit need is not reasonable to meet."

Additionally, the Act specifies that..." An agency's determination of needs that are reasonable to meet shall not be made by comparing unmet transit needs with the need of streets and roads. "

I. The "unmet needs" definition adopted by Council of San Benito County Governments:

"Unmet needs are defined as expressed or identified needs of a significant segment of the community for public transportation services to meet basic mobility needs which are not currently being met through existing transit services or other means of transportation.

Included, at a minimum, are those public transportation or specialized services that are identified in the Regional Transportation Plan, Short Range Transit Plan and/or Transit Development Plan, which have not been implemented or funded."

II. The "unmet needs" threshold criteria adopted by the Council of San Benito County Governments:

The following criteria must be true for the COG to consider a request an "unmet need". If a request **fails** to satisfy any of the criteria below, the request is **not** an unmet need.

1. The request fills a gap in transit service, or is identified as a deficiency in the Regional Transportation Plan.
2. Sufficient *broad-based* community support exists.
3. Request is a *current* rather than *future* need.
4. Request is not operational in nature (i.e. minor route change, bus stop change, etc.)

III. Adopted Definition of "Transit Needs That Are Reasonable To Meet Determination."

In making the reasonableness determination, an analysis will be conducted on existing transit services, available options, likely demand and general costs based on similar services in the area and available studies. Once completed, the following criteria shall be considered.

REASONABLE TO MEET CRITERIA

In making a reasonableness determination, an analysis will be conducted on existing transit services, available options, likely demand and general costs based on similar services in the area and available studies. An Unmet Transit Need would be considered reasonable to meet if the proposed service is in general compliance with the following criteria:

A. EQUITY

The proposed service would:

1. Benefit the general public.
2. Not unreasonably discriminate against nor favor any particular area or segment of the community at the exclusion of any other.
3. Not result in adversely affect existing services in other parts of the transit system that have an equal or higher priority immediately or within the foreseeable future.
4. Require a subsidy per passenger generally equivalent to other parts of the transit system, unless overriding reasons so justify.

B. TIMING

The proposed service would:

1. Be in response to an existing rather than a future need.
2. Be implemented consistent with federal, state, or regional funding approval schedules, if such funds are the most appropriate primary method of funding.

C. COST EFFECTIVENESS

The proposed service would:

1. Not cause the responsible operator or service claimant to incur expenses in excess of the maximum allocated funds.
2. Not set a precedent for other service expansions without a reasonable expectation of available funding.
3. Have available funding on a long-term basis to maintain the service.

D. SYSTEM PERFORMANCE

1. The efficiency of the new, expanded or revised transit service, excluding specialized transportation services, shall be measured on efficiency, such as:
 - Cost per passenger trip,
 - Cost per vehicle service hour,
 - Passenger trips per vehicle service hour,
 - Passenger trips per service mile,
 - On-time performance.
2. The proposed service would have a reasonable expectation of future increase in ridership.

E. OPERATIONAL FEASIBILITY

1. The new, expanded or revised transit service must be safe to operate and there must be adequate roadways and turnouts for transit vehicles.
2. The new service would be provided with the existing vehicle fleet or with vehicles that can be acquired with available funds.
3. The new service would have the available maintenance staff to cover the additional vehicle maintenance hours incurred as a result of the proposed service.

F. COMMUNITY ACCEPTANCE

A significant level of community support exists for the public subsidy of transit services designed to address the unmet transit need. Including but not limited to, community groups, community leaders, and community meetings reflecting support for the unmet transit need.

G. ADA CONFORMITY

The new, expanded or modified service, excluding specialized transportation services, would conform to the requirements of the Americans with Disabilities Act. The COG shall consider the financial impact on the TDA claimant if complementary paratransit services are required as a result of the new, expanded, or modified service.

H. OTHER FACTORS

Other specific, formulated components that COG determines to affect the reasonableness of meeting an unmet transit need.

Unmet Transit Needs Feedback

Public Comment	Translation (when applicable)	Can we contact?	Contact Info	Determination	Reasonable To Meet Criteria	SBCOG Response
Red line put back into service going to new Amazon buildings.		No		Unmet Transit Need: Reasonable to Meet	Not applicable	The Short Range Transit Plan identifies the restoration of the Hollister Fixed Route service. Future services outlined in the S RTP may be implemented dependent on available drivers and funding.
Hollister to San Jose		Yes	4103404636	Unmet Transit Need: Reasonable to Meet	Not applicable	During the outreach process for the Short Range Transit Plan, LTA did not receive community requests for establishing a permanent, direct services to the Bay Area. SBCOG is actively pursuing funding opportunities to run a pilot program for bus service from Hollister to San Jose. If funded, this pilot program could help gauge feasibility and broader community demand for a more permanent service.
Service at the warming shelter, provide a service to the individuals living there so they can get to the county resource offices at the job center, grocery store, and a return service		Yes	831-902-7415	Unmet Transit Need: Reasonable to Meet	Not applicable	The Short Range Transit Plan identifies the restoration of the Hollister Fixed Route service. Future services outlined in the S RTP may be implemented dependent on available drivers and funding.
The old RED, BLUE and GREEN Routes! There is no routes to Shopping Centers or even Hospitals or Medical Centers other than spotty Dial - A - Ride service. PLUS! There should be more than one Bus Stop in the growing city of San Juan Bautista!		Yes	831-297-0639	Unmet Transit Need: Reasonable to Meet	Not applicable	The Short Range Transit Plan identifies the restoration of the Hollister Fixed Route service. Future services outlined in the S RTP may be implemented dependent on available drivers and funding.
North to south for shopping		No		Unmet Transit Need: Reasonable to Meet	Not applicable	The Short Range Transit Plan identifies the restoration of the Hollister Fixed Route service. Future services outlined in the S RTP may be implemented dependent on available drivers and funding.
red line		Yes	4084259766	Unmet Transit Need: Reasonable to Meet	Not applicable	The Short Range Transit Plan identifies the restoration of the Hollister Fixed Route service. Future services outlined in the S RTP may be implemented dependent on available drivers and funding.
We need Fixed Routes back everyday and Weekends too. People need to get stuff done during week + on weekends		No		Unmet Transit Need: Reasonable to Meet	Not applicable	The Short Range Transit Plan identifies the restoration of the Hollister Fixed Route service. Future services outlined in the S RTP may be implemented dependent on available drivers and funding.
Fixed Routes back!		No		Unmet Transit Need: Reasonable to Meet	Cost Effectiveness	The Short Range Transit Plan identifies the restoration of the Hollister Fixed Route service. Future services outlined in the S RTP may be implemented dependent on available drivers and funding.
Dail a Ride is not always available when needed. Would like a regular service to get to appointments at the hospital and shopping. South Rd by animal shelter.				Unmet Transit Need: Reasonable to Meet	Not applicable	The Short Range Transit Plan identifies the restoration of the Hollister Fixed Route service. Future services outlined in the S RTP may be implemented dependent on available drivers and funding.
Bringing back the Red line would be helpful. I go to the food pantry weekly and dial a ride is not always available		No		Unmet Transit Need: Reasonable to Meet	Not applicable	The Short Range Transit Plan identifies the restoration of the Hollister Fixed Route service. Future services outlined in the S RTP may be implemented dependent on available drivers and funding.
Linia roja	Red line	No	N/A	Unmet Transit Need: Reasonable to Meet	Cost Effectiveness	The Short Range Transit Plan identifies the restoration of the Hollister Fixed Route service. Future services outlined in the S RTP may be implemented dependent on available drivers and funding.

Servicio a las tiendas como la Target	Service to stores like Target			Unmet Transit Need: Reasonable to Meet	Not applicable	The Short Range Transit Plan identifies the restoration of the Hollister Fixed Route service. Future services outlined in the SRTP may be implemented dependent on available drivers and funding.
Las rutas de antes durante la semana y fines de semana	Bring back the old fixed routes with service during the week and on weekends	No	N/A	Unmet Transit Need: Reasonable to Meet	Not applicable	The Short Range Transit Plan identifies the restoration of the Hollister Fixed Route service. Future services outlined in the SRTP may be implemented dependent on available drivers and funding.

Public Comment	Translation (when applicable)	Can we contact?	Contact Info	Determination	Reasonable To Meet Criteria	SBCOG Response
Frequent bus service all day to and from gilroy and monterey bay locations		Yes	8315373303	Unmet Transit Need: Not Reasonable to Meet	Cost Effectiveness	The Short Range Transit Plan analyzed the feasibility of services to Salinas, Santa Cruz, and Watsonville. The Plan does not identify services to the above-mentioned cities as feasible options for services expansion due to the LTA's available and projected revenue sources. During the outreach process, the LTA did not receive significant community feedback requesting services to Salinas, Santa Cruz, or Watsonville.
More frequent all day service seven days a week to and from Gilroy and the Monterey Bay		Yes	8315373303	Unmet Transit Need: Not Reasonable to Meet	Cost Effectiveness	The Short Range Transit Plan analyzed the feasibility of services to Salinas, Santa Cruz, and Watsonville. The Plan does not identify services to the above-mentioned cities as feasible options for services expansion due to the LTA's available and projected revenue sources. During the outreach process, the LTA did not receive significant community feedback requesting services to Salinas, Santa Cruz, or Watsonville.
Service to Morgan hill and San Jose.		Yes	4085317650	Unmet Transit Need: Not Reasonable to Meet	Cost Effectiveness	During the outreach process for the Short Range Transit Plan, LTA did not receive community requests for establishing a permanent, direct services to the Bay Area. SBCOG is actively pursuing funding opportunities to run a pilot program for bus service from Hollister to San Jose. If funded, this pilot program could help gauge feasibility and broader community demand for a more permanent service.
Good connection with Bay Area - currently you can take a shuttle to Gilroy (which sometimes take 1.5h to get there) and then a bus since trains are leaving only very early in the morning) making one way trip time equal to 3h+ which is quite insane.		Yes	4086379089	Unmet Transit Need: Not Reasonable to Meet	Cost Effectiveness	During the outreach process for the Short Range Transit Plan, LTA did not receive community requests for establishing a permanent, direct services to the Bay Area. SBCOG is actively pursuing funding opportunities to run a pilot program for bus service from Hollister to San Jose. If funded, this pilot program could help gauge feasibility and broader community demand for a more permanent service.
There's no transportation service after 7pm, other than taxi or Uber		No		Unmet Transit Need: Not Reasonable to Meet	Cost Effectiveness	Being identified as a longer term improvement to County Express service, extended service hours will not be financially feasible to implement at this time.
Bus that runs all the to Aromas		Yes	8312471606	Unmet Transit Need: Not Reasonable to Meet	Cost Effectiveness, Community Acceptance	Service to Aromas was explored in the Short Range Transit Plan. During the SRTP outreach process, the concept of extending service to Aromas received little support from both stakeholder groups and public feedback.

<p>My name is Elizabeth Martinez and I am an employee for San Benito High School District - Migrant Education Program. The students in our program have high transportation needs, especially for Day Summer School. Our program provides tokens to our students but having only one fixed route during summer is not enough. Many of our families live outside of the city limits and with the new housing developments throughout Hollister the current route doesn't provide sufficient coverage. Many of our migrant families who work in agriculture during the summer and leave very early in the morning and return late in the evening making it impossible for them to transport their student/s to and from summer school. The school district is unable to provide transportation during the summer. Expanding your County Transit service during summer will provide our migrant students with the opportunity to make up Fs and get back on track to graduate. We need your help to ensure migrant students get the same opportunities as others. Without this service, our migrant students will face yet another challenge. Many already struggle with food insecurities and housing. Our community is growing and this service needs to expand to meet the transit needs now and for the future.</p>		Yes	831-637-5831 Ext. 1702	Unmet Transit Need: Not Reasonable to Meet	Cost Effectiveness	The Short Range Transit Plan identifies the restoration of the Hollister Fixed Route service. Future services outlined in the SRTP may be implemented dependent on available drivers and funding.
salinas		No		Unmet Transit Need: Not Reasonable to Meet	Cost Effectiveness	The Short Range Transit Plan analyzed the feasibility of services to Salinas, Santa Cruz, and Watsonville. The Plan does not identify services to the above-mentioned cities as feasible options for services expansion due to the LTA's available and projected revenue sources. During the outreach process, the LTA did not receive significant community feedback requesting services to Salinas.
more routes to Gilroy or Salinas		No		Unmet Transit Need: Not Reasonable to Meet	Cost Effectiveness	The Short Range Transit Plan analyzed the feasibility of services to Salinas, Santa Cruz, and Watsonville. The Plan does not identify services to the above-mentioned cities as feasible options for services expansion due to the LTA's available and projected revenue sources. During the outreach process, the LTA did not receive significant community feedback requesting services to Salinas, Santa Cruz, or Watsonville. Service to Gilroy is currently provided by the Intercounty route.
Santa Cruz, Los Banos		No		Unmet Transit Need: Not Reasonable to Meet	Cost Effectiveness	The Short Range Transit Plan analyzed the feasibility of services to Salinas, Santa Cruz, and Watsonville. The Plan does not identify services to the above-mentioned cities as feasible options for services expansion due to the LTA's available and projected revenue sources. During the outreach process, the LTA did not receive significant community feedback requesting services to Santa Cruz or Los Banos.
It would be nice to have evening service available, especially in the summer.		Yes	831-801-8961	Unmet Transit Need: Not Reasonable to Meet	Cost Effectiveness	Being identified as a longer term improvement to County Express service, extended service hours will not be financially feasible to implement at this time.

More bus service on the weekends		Yes	408-512-8501	Unmet Transit Need: Not Reasonable to Meet	Cost Effectiveness	Being identified as a longer term improvement to County Express service, extended service hours will not be financially feasible to implement at this time.
Would want more weekend services to go shopping		Yes	702-275-5906 (possibly 102-275-5906)	Unmet Transit Need: Not Reasonable to Meet	Cost Effectiveness	Being identified as a longer term improvement to County Express service, extended service hours will not be financially feasible to implement at this time.
Transporte a Watsonville	Transportation to Watsonville	No	N/A	Unmet Transit Need: Not Reasonable to Meet	Cost Effectiveness	The Short Range Transit Plan analyzed the feasibility of services to Salinas, Santa Cruz, and Watsonville. The Plan does not identify services to the above-mentioned cities as feasible options for services expansion due to the LTA's available and projected revenue sources. During the outreach process, the LTA did not receive significant community feedback requesting services to Watsonville.

Public Comment	Translation (when applicable)	Can we contact?	Contact Info	Determination	Reasonable To Meet Criteria	SBCOG Response
On Demand		Yes	2095093111	Not an Unmet Transit Need	Not applicable	The On-Demand service was a pilot program that was implemented during COVID similar to Dial-A-Ride services. On-demand was a shared-ride, public transit service within the City of Hollister. Currently, riders have the option to book similar trips through Dial-A-ride services.
Earlier services and a pick up at Gavilan college during week nights between the 7:20 and 9:20 pick up times.		No		Not an Unmet Transit Need	Not applicable	Being an operational request, this is not an unmet transit need. Thank you for your comment.
More availability		No		Not an Unmet Transit Need	Not applicable	Being an operational request, this is not an unmet transit need. Thank you for your comment.
I live out in the county (Lovers Lane) and the bus doesn't want to come pick up my brother who is in a wheelchair. And doesn't always need to go to a medical appointment. Sometimes he wants to go a movie or have lunch somewhere		Yes	831-207-8749, Norma	Not an Unmet Transit Need	Not applicable	A large portion of the residences on Lovers Lane lie outside of the current Dial-a-Ride service area.
It would be nice if the intercounty buses (at least) had wifi+charging station for phones.		No		Not an Unmet Transit Need	Not applicable	Based on our outreach process for our Short Range Transit Plan, we did not receive significant community feedback in support of these amenities.
A second stop in SJB by the library				Not an Unmet Transit Need	Not applicable	Being an operational request, this is not an unmet transit need. Thank you for your comment.
Put more bus stops in new housing areas.		No		Not an Unmet Transit Need	Not applicable	Being an operational request, this is not an unmet transit need. Thank you for your comment.
Get southside school to put in a bus stop on outside of school to help kids get to school.		No		Not an Unmet Transit Need	Not applicable	Being an operational request, this is not an unmet transit need. Thank you for your comment.
More DAR trips to San Juan Bautista		No		Not an Unmet Transit Need	Not applicable	Being an operational request, this is not an unmet transit need. Thank you for your comment.
Weekend bus to Gilroy outlets		No		Not an Unmet Transit Need	Not applicable	Weekend service is currently provided to the Gilroy Transit Center by our Intercounty route. During the outreach process for our Short Range Transit Plan, the LTA did not receive community requests for direct service to the Gilroy Outlets.
Please add a bus stop pick up/drop off to Gilroy in the area of Union Rd-Southside Bennett Ranch Thank you				Not an Unmet Transit Need	Not applicable	Being an operational request, this is not an unmet transit need. Thank you for your comment.
Speaking for myself, I road thebus for 10 years to get back and forth to Caltrain in Gilroy. I would recommended adding more trips so we're not sitting and waiting time trying to get home or to the train. Other than that, its great...				Not an Unmet Transit Need	Not applicable	In recent years, the LTA has added a significant amount of additional trips to the Intercounty service. Current frequency is near double compared to our pre-COVID service.
Planners Samuel and Douglas spoke with a woman at the 4th and San Benito NB bus stop. She expressed that the stops need more thorough cleaning. She also expressed safety concerns about the stairs to get on the bus, mainly that they are too narrow and that the railings do not feel secure to hold onto.				Not an Unmet Transit Need	Not applicable	LTA will follow up with our operator on cleaning the stop in question.

Directo asia gavilán college de ida y vuelta	Direct service to Gavilan College roundtrip	No	N/A	Not an Unmet Transit Need	Not applicable	Intercounty service currently transports passengers to Gavilan. Direct service that bypasses other stops along the way was not given significant community support during our Short Range Transit Plan outreach process.
Nada todo bien satisfecho	No, it is great	Yes	831-265-1971 "	Not an Unmet Transit Need	Not applicable	Thank you for your comment!
Servicio a los mercados y farmacia es dificil de llegar de la miller puerta a puerta no puede todo el tiempo	Dial-a-ride services to markets and the pharmacy are often difficult to get from Miller Street	No	N/A	Not an Unmet Transit Need	Not applicable	The Short Range Transit Plan identifies the restoration of the Hollister Fixed Route service. Future services outlined in the SRTP may be implemented dependent on available drivers and funding.
Mas rutas fijas con bancos. Jovenes mas operadores	More fixed route service with benches. Jovenes needs more operators			Not an Unmet Transit Need	Not applicable	The Short Range Transit Plan identifies the restoration of the Hollister Fixed Route service. Future services outlined in the SRTP may be implemented dependent on available drivers and funding. With the second part of the comment being operational in nature, it does not meet the criteria to be considered an unmet transit need.