

Sacramento Transit Advocates and Riders (STAR) welcomes the opportunity to comment on the current service change proposal. With two exceptions, we are not commenting on routes, but rather suggesting criteria that must be considered in making service changes.

Criteria:

1. **Reinvestment:** A portion of the savings from elimination or combination of routes should be reinvested to increase frequency or hours of service on higher productivity routes.
2. **Frequency:** Reducing route frequency is unlikely to save money because it makes the route less productive and more likely to eventually fail by falling below minimum productivity standards.
3. **Combination and realignment:** Combination and realignment of routes, as suggested in Scenario A, is worth considering, since existing routes overlap unnecessarily in some cases and leave geographic gaps in others.
4. **Two years:** Routes should not be eliminated for at least two years after establishment or significant revision. It takes time for riders to adapt to new routes and schedules, and for the route to develop strong ridership.
5. **Low ridership routes:** RT should develop, adopt, and implement better ways to service the mobility needs of transit dependent persons now being served by low productivity routes. Maintaining low productivity routes solely to maintain Paratransit service hurts the system, and argues for more creative solutions to this issue.

Routes:

1. **Gold Line to Sacramento Valley Station and Green Line:** A reduction of frequency service by the Gold Line to Sacramento Valley Station is unacceptable as that change might reduce ridership to a level below minimum productivity standards because Amtrak Capitol Corridor passengers could no longer rely on it. Two bus routes offer service to Township 9. The Township 9 developer could pay Green Line operational expenses until such time as ridership increases enough to exceed minimum productivity standards.
2. **Route 65:** We do not support elimination of Route 65 because it has not been in operation for a long enough to build ridership and community support.

We want to see more disclosure about how the Scenario A list was developed, including interrelationship of bus and light rail service. It is not clear how cost savings and ridership changes were used to select routes. Maps showing bus stop and light rail stop boardings, population density, areas of low income transit-dependent riders, and employment centers would help the public understand how decisions about service changes are made.

A system redesign is necessary in order to improve overall efficiency and usability. The series of cuts and changes over the last eight years has resulted in a system which does not balance the needs of riders with the goal of operating a financially stable and efficient system.

The service change proposal, with significant loss of routes and service, demonstrates that an operational audit must occur so that we better understand what is causing the financial crisis, need for service changes, fare increases, and loss of ridership, and how these issues can be resolved effectively, both in the short term and ongoing.