

February 23, 2022

**To: Golden Gate Bridge, Highway, and Transportation District Board of Directors**  
February 24th, 2022, Transportation Committee  
**Re: Agenda Item 5, Update on Regional Transit Coordination Efforts**

Dear Golden Gate Transit Board members:

How Bay Area transit is planned and operated regionally is a matter of critical importance to our region's future accessibility, equity, and sustainability. The Blue Ribbon Transit Recovery Task Force included in its adopted problem statement that there is insufficient "network management resources and authority" to "ensure frequent, reliable service to key destinations across boundaries of multiple agencies, with efficient connections at multi-modal hubs."

To address this structural problem with Bay Area transit, we are supportive of the Network Management Business Case taking place over the next several months to identify a much more effective governance structure for Bay Area transit that can deliver on our collective goals - increasing transit ridership, meeting our climate goals, and expanding access. A consultant team with global expertise in effective governance structures and familiarity with the Bay Area regulatory, governance, and funding context has been selected to complete this analysis.

We welcome the opportunity for the consultant team leading the Business Case to analyze the "GMs-Refined Proposal" presented to you today by staff alongside other network management options that are based on global best practices. But transit agency boards should make it clear that supporting *the analysis* of the GMs-Refined Proposal within the business case does not constitute *an endorsement* of the proposal. Instead, we strongly encourage Board members to reserve judgment about a preferred network management proposal until the full suite of governance options have been presented to them and are assessed against the evaluation criteria co-created by Advisory Group members.

Our groups support inclusion of the analysis of the GMs-Refined Proposal as part of the Business Case study. However, based on what has been shared, several challenges with proposal should be noted:

- **Fragmented Authority:** The proposal does not identify a governing body with policymaking accountability over the full range of regional transit system functions identified by Blue Ribbon Task Force, including fares, customer information, transit priority, or network planning. The proposed decision-making structure of an 'executive board' made up of general managers replicates existing structures for coordination in the Bay Area that have been in place for decades, and which have not resulted in

meaningful changes for customers. Such a structure relies entirely on consensus and voluntary action, limiting the scope of any regional policy initiative.

- **Lack of Policymaking Accountability to Riders:** The proposed executive board is not accountable to riders generally, but to each individual board. In turn, each board has a fiduciary responsibility to its own agency, which detracts from a focus on customers. With the proposed structure, riders must appeal to multiple separate boards about any issue that may pertain to multiple services. This is unfair to the public and riders, who generally want one accountable body to appeal to that can improve mobility across their full range mobility needs.
- **Duplication of existing structures & potential to increase bureaucracy:** Rather than centralize and simplify decision-making around regional issues, the proposed structure could add further bureaucracy. The proposal doesn't include centralizing any shared functions across agency lines where there is a shared interest; it creates a number of parallel structures, such as a citizens advisory board, that already exist within MTC. The proposal appears to create more meetings, not fewer, where riders will need to speak up to express their needs.

**In summary, we would urge agencies to refrain from endorsing any preferred network management proposal at this early stage of the Business Case timeline. Instead, we encourage operators to engage deeply in the business case process to develop and evaluate multiple options to determine which choice delivers the best outcomes for riders.**

The Bay Area is capable of doing big things to improve our transit system, and now is a unique opportunity to consider doing big things that can transform our network. We look forward to partnering with Golden Gate Transit in advancing these transformative changes together, as the findings of the Network Management Business case emerge over the coming months.

Thank you,

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Seamless Bay Area

Laura Tolhoff, Transportation Policy Director  
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