

Report and Recommendation

SEPTA FY 2020
ANNUAL SERVICE PLAN

Eugene N. Cipriani
Hearing Examiner
June 10, 2019

CONTENTS

Appointment of Hearing Examiner	1
Purpose of Annual Service Plan.....	1
The Hearings.....	2
SEPTA Proposal.....	4
Public Testimony	8
Route Performance Analysis	13
Hearing Examiner's Recommendations	15

Appointment of Hearing Examiner

Eugene N. Cipriani, Esquire was appointed as Hearing Examiner by Pasquale T. Deon, Sr., Chairman of the Board of the Southeastern Pennsylvania Transportation Authority ("Authority"), on May 9, 2019, to consider whether all parts of the SEPTA FY 2020 Annual Service Plan should be recommended for implementation.

This appointment appears as SEPTA Exhibit No. 1.

Purpose of Annual Service Plan

A joint effort by the Southeastern Pennsylvania Transportation Authority and the City of Philadelphia in the mid-1990's resulted in a document entitled "City Transit Division Service Standards and Process." This document was adopted as official policy by SEPTA, and it includes the requirement for an Annual Service Plan. The first Annual Service Plan for SEPTA's City Transit Division was adopted by the SEPTA Board for Fiscal Year 1996. Similar Annual Service Plan procedures were approved in 1999 for SEPTA's Suburban Transit Division and its Regional Rail Division.

Two hearings were held for this FY 2020 Annual Service Plan, and they include service modifications for SEPTA's operating units – City Transit Division and Suburban Transit Division – as well as an overhaul of SEPTA's *Service Standards and Process* document utilized by the SEPTA Service Planning Department. There are no changes or station abandonments proposed for the Railroad Division this year.

The Annual Service Plan is a one-year scenario that identifies all relevant proposals for route and service changes for SEPTA's transit routes for the forthcoming year. It includes suggestions from elected officials, community groups, and passenger advocate groups, the SEPTA Citizens Advisory Committee, the City of Philadelphia's Mayor's Office of Transportation & Infrastructure Systems, local and county planning commissions, passengers and SEPTA's Service Planning Department. Each submittal for changes to a route or creation of a new route is analyzed by SEPTA staff for its economic viability and passenger demand. The financial impact of each change on the forthcoming annual operating budget is considered. Proposals that meet established service standards and that impact the operating budget are then subject to a Comparative Evaluation Process which includes ridership forecast, cost analysis and a community benefit analysis.

The Annual Service Plan seeks to incorporate changes to the SEPTA system that will "achieve specific service goals and objectives, and opportunities for cost-effective service expansion. ... All major route and service adjustments which impact SEPTA's operating budget will be planned and implemented according to the Annual Service Plan."

The projects that are ultimately selected for the forthcoming Annual Service Plan are formatted into formal tariffs, and a series of public hearings are conducted. Based on the proposals in the document, on testimony at the public hearings and on submitted exhibits, the Hearing Examiner then makes recommendations to the SEPTA Board. The Board makes the final decision on whether or not to implement all or portions of the Annual Service Plan.

The Hearings

Two public hearings were conducted for the FY 2020 Annual Service Plan, as follows:

Wednesday, May 29, 2019

12:00 Noon and 5:00 P.M.

SEPTA Board Room

Mezzanine Level

1234 Market Street

Philadelphia, PA 19107

The SEPTA witnesses participating in the hearings included the following individuals from the Service Planning Department: Mark Cassel, Director of Suburban Service Planning and Schedules, Steven D'Antonio, Director of City Service Planning; Harley Cooper, Senior Operations Planner; and Daniel Nemiroff, Senior Operations Planner.

The tariffs filed in connection with these hearings are as follows:

- Tariff No. 42, Supplement No. 6 (Route 40);
- Tariff No. 50, Supplement No. 6 (Route 73);
- Tariff No. 68, Supplement No. 9 (Route 104) and
- Tariff No. 237, Supplement No. 1 (Route 131).

In addition, proposed changes to SEPTA's *Service Standards and Process* were set forth.

A total of fourteen (14) persons attended the two hearings and six (6) spoke. The record was kept open through 4:00 P.M. on June 5, 2019 for anyone who wished to submit additional testimony, letters, or emails.

A stenographic transcript of the hearings was made and is available for inspection on the 5th floor of the Authority's offices at 1234 Market Street, Philadelphia.

Included as part of the record are SEPTA exhibits and public exhibits, including four (4) e-mails.

SEPTA Exhibits

- | | |
|----------------------|--|
| SEPTA Exhibit No. 1: | The appointment of the Hearing Examiner. |
| SEPTA Exhibit No. 2: | Affidavits establishing the publication of legal notices concerning the public hearings in local newspapers. |
| SEPTA Exhibit No. 3: | Affidavits confirming the posting of Notices of these hearings at various SEPTA locations. |
| SEPTA Exhibit No. 4: | A copy of the text of SEPTA's public notice, referenced in Exhibits Nos. 2 and 3. |

- SEPTA Exhibit No. 5(a): Affidavit indicating that a summary of SEPTA's Fiscal Year 2020 Annual Service Plan was distributed to the Associated Services for the Blind, as well as made available on ASB website (www.asb.org) and through the National Federation of the Blind (NFB) Newsline toll free telephone service.
- SEPTA Exhibit No. 5(b) The CD disc identical to that provided by SEPTA to the Associated Services for the Blind and referenced in SEPTA Exhibit No. 5(a).
- SEPTA Exhibit No. 6: Tariff No. 42, Supplement 6 (Route 40).
- SEPTA Exhibit No. 7: Tariff No. 50, Supplement No. 6 (Route 73).
- SEPTA Exhibit No. 8: Tariff No. 68, Supplement No. 9 (Route 104).
- SEPTA Exhibit No. 9 Tariff No. 237, Supplement No. 1 (Route 131).
- SEPTA Exhibit No. 10: SEPTA's Proposed Fiscal Year 2020 Annual Service Plan document, dated July 2019.
- SEPTA Exhibit No. 11: SEPTA's Service Standards and Process, updated 2019.
- SEPTA Exhibit No. 12: SEPTA FY 2018 Route Performance Evaluation Report, dated April 2019.
- SEPTA Exhibit No. 13: FY 2020 Annual Service Plan – Public Hearing Testimony, May 29, 2019.

Public Exhibits Including Emails and Letters

- Public Exhibit No. 1: Email dated April 9, 2019 from Michael White requesting a new route serving Snyder Plaza and Quartermaster Plaza, a Route 51 on Wolf and Ritner Streets, and also a Route 41 serving Snyder Avenue to Grays Ferry on McKean and Mifflin Streets.
- Public Exhibit No. 2: Email dated May 28, 2019 from Benjamin She, Philadelphia, PA, Co-Chair of the Transit Committee for 5th Square. Mr. She applauds the work of the SEPTA staff regarding the new Service Standards and the Comprehensive Bus Network Redesign (CBNR). He encourages SEPTA, in studying bus network redesigns, to adopt a "blank slate" approach, i.e., deliberately not considering what your network does currently so as to discover new patterns of flow that are a better fit for the system currently. He opined that the reduction in ridership could hurt SEPTA's formula grant funding and fare revenue in general.
- Public Exhibit No. 3: Email dated May 28, 2019 from Marilyn Lockman, Norristown, PA, requesting an extension of the Route 131 down to Adams and Monroe Boulevard and to not change to Fall/Spring scheduling. In particular, the Fall schedule change means those exiting their employment at Archway Marketing after 2:30 P.M. must wait until the 3:10 P.M. bus which, because it has to go through two school

zones, does not make it to the Norristown Transportation Center for 4:00 P.M.

- Public Exhibit No. 4: Email dated May 28, 2019 from Joel Arnold, Philadelphia, PA, stating that SEPTA's service plan needs to call for more dedicated bus lanes throughout the City. Buses are the backbone of the system and any service plan needs to include detailed plans to roll out an extensive network of exclusive bus lanes to allow buses to travel separately from general vehicle traffic.
- Public Exhibit No. 5: Appearance Form of Jeffrey Cutler.
- Public Exhibit No. 6: Appearance Form of Brandan McBride.
- Public Exhibit No. 7: Appearance Form of Douglas Diehl, Tri State Transit Center.
- Public Exhibit No. 8: Appearance Form of Charles Bode, Tri-State Citizens Council on Transportation.
- Public Exhibit No. 9: Appearance Form of Alfred Achtert, Jr.
- Public Exhibit No. 10: Appearance Form of Benjamin She, Transit Committee for 5th Street.
- Public Exhibit No. 11: Appearance Form of Charles Krueger.
- Public Exhibit No. 12: Appearance Form of Patricia DiNatale, Office of Transportation, Infrastructure and Sustainability (oTIS) of the City of Philadelphia.
- Public Exhibit No. 13: Appearance Form of Lee Wall, SEPTA Citizens Advisory Committee.
- Public Exhibit No. 14: Appearance Form of Thomas Hastings, Delaware County Planning Department.

SEPTA PROPOSAL

SEPTA Service Planning did not publicly solicit a request for project proposals. This is due to the focus on updating SEPTA's ***Service Standards and Process***, along with the prospect of a Comprehensive Bus Network Redesign (CBNR). The CBNR process would look at network mobility rather than focusing solely on individual routes. The four (4) projects being recommended – as listed below – consist solely of changes that have previously been implemented experimentally and are proposed for permanent status.

SEPTA RECOMMENDED PROJECTS

Suburban Transit

- Route 104 – A change to the end of line at West Chester University to address a University proposal to close a street at the previous end of line at Church Street and University Avenue. The new end of line keeps buses on High Street to and from the Swope Performing Arts Center.

- Route 131 – The change added service to a portion of Egypt Road and Shannondell Boulevard to improve service to the Audubon Village Shopping Center and Shannondell at Valley Forge.

City Transit

- Route 40 – A change to the alternate routing using Pine Street during times when South Street is congested. Also, discontinuance of a portion of the base route to private property near the intersection of Front and Lombard Streets, which was approved but never implemented.
- Route 73 – A change to the routing to enter the Shoppes at Wissinoming Shopping Center during business hours for improved access to a full service supermarket. Recent ridership counts show 183 trips on weekdays, 106 on Saturdays and 51 on Sundays.

Regional Rail Division

- No projects recommended

Service Standards and Process Proposals

What is Proposed

As part of the FY 2020 Annual Service Plan, the SEPTA Service Planning Department undertook an overhaul of its ***Service Standards and Process*** document. The updated standards document is the result of an extensive review process that included interviews with peer agencies and presentations to internal departments, planning partners and the public

Service Standards are guidelines that the SEPTA Service Planning Department uses to plan, monitor and analyze transit services, and are typically broken into several distinct categories.

- **Quality of Service Standards** establish the minimum level of service that customers can expect and refer to characteristics such as coverage and access, frequency, on-time performance and load. Many of these are standards from the Federal Transit Administration's Title VI program.
- **Performance Standards** create benchmarks for evaluating and allocating service. SEPTA has historically used farebox recovery as its primary performance standard.
- **Design Standards** deal with matters such as network connectivity, route spacing, directness and stop spacing. While SEPTA has always used these concepts in service planning, the updated Service Standards integrate them more fully into the Service Development Process.

SEPTA's Service Standards are "public-facing" and Board approved.

SEPTA was one of the first transit agencies in the United States to adopt Service Standards. Standards for City services were formally adopted in 1995, with Suburban Services and Regional Rail coming in 1999. In 2007, all of the documents were combined into a set of comprehensive service standards for all modes at SEPTA.

Service Standards introduced route rankings, using operating ratio to identify underperforming routes, and created the Annual Service Plan process. The standards have been adjusted over time, primarily to comply with the Federal Transit Administration's Title VI program and PennDOT's loading standards. This, however, is the first overhaul of the Service Standards since they were first adopted more than 20 years ago.

Why Changes are proposed Now

The SEPTA Service Planning Department is moving to change the Standards now for several reasons.

First, there are new technologies and data sources that are now available to the SEPTA Service Planning Department. This includes mapping and database management capabilities in *ARCGIS*, the software *Remix*, which allows planners to evaluate routing and schedule changes quickly and estimate costs in real-time, as well as *Automatic Passenger Counter* data, which gives stop-by-stop ridership on SEPTA routes.

Second, the desire to incorporate more robust outreach opportunities into the Service Development Process.

Third, the performance measures established by PennDOT under Act 44, in its transit agency performance reviews.

Finally, the **Philadelphia Choices Report**, completed for SEPTA by Jarrett Walker & Associates in 2018, introduced a series of industry-supported design standards, several of which are being recommended for adoption in this update.

Goals

The Goals of the Service Standards and SEPTA's Service Development Process are as follows:

- Promote transparency and accountability to customers, partners and to the Commonwealth of Pennsylvania;
- Engage customers and stakeholders and ensuring that they are part of the service planning process;
- Develop a data-driven and performance-based planning process that ties route performance to service development; and
- Adopt and apply industry-accepted network design standards that balance the needs of customers with a responsible use of resources.

What Changes are Proposed

The first change is to the route classification system and the adoption of new metrics and measures to determine how routes perform and which routes are underperforming.

Currently, SEPTA routes are divided into two categories, city routes and suburban routes, with some city routes, such as those operating in parts of Northeast Philadelphia, identified as having suburban characteristics and judged by slightly different standards. These routes are ranked by operating ratio, with routes falling below 60 percent of the average considered to be underperforming.

The Service Planning Department recommends modifying the classification system. There will still be city and suburban route categories, with new categories for expressway routes, which are bus routes travelling on I-76 or I-476, and for City/Suburban Arterial Routes, which are bus routes that travel on major roadways such as Roosevelt Boulevard, Pennsylvania Route 611 and West Chester Pike. In addition, fixed services, including the Trolley routes in West and Southwest Philadelphia, Routes 101 and 102, and the Norristown High Speed Line, will be evaluated separately because of their unique operating characteristics and cost inputs. There are also routes, such as the 200-series and the LUCY, that will be evaluated separately because of the unique service needs that they fulfill.

In addition to the modifications to the route classification system, SEPTA Service Planning recommends adopting new primary metrics to evaluate route performance, replacing operating ratio. These metrics are: **Passengers per Revenue Hour**, a productivity measure, and **Cost per Passenger**, a cost effectiveness measure

To evaluate route performance, each category of route will be placed in a “scatterplot chart”. Routes with the strongest performance will be in the top right of each chart.

Routes falling in the bottom 15th percentile in both metrics will be considered underperforming and identified as a candidate for evaluation and possible intervention. Intervention can include targeted marketing efforts, routing adjustments or other strategies intended to boost ridership and/or manage costs.

All of this information will be compiled annually in the **Route Performance Evaluation Report** and will be made available to the public. This report will serve as one input into the Service Development process.

Another major change Service Planning is recommending is the elimination of the Community Benefit Score and the adoption of a more network-focused analysis. The Community Benefit Score is a screening tool that evaluates the merit of a service proposal based on a number of factors, including the addition or elimination of a transfer, an increase or decrease in travel time, and an increase or decrease in walking distance.

These factors are all important when considering a routing change. However, equally as important is the impact of the proposal to the network as a whole. The Service Planning Department recommends replacing the Community Benefit Score with a series of access calculations using Isochrone mapping in *Remix*. Isochrone maps show how far a person can get in a specified period of time using transit; and includes in its calculations walking, waiting and transfer time. It factors in many of the same inputs of the Community Benefit Score, but includes other transit services as well. Replacing the

Community Benefit Score with Isochrone mapping will prevent the implementation of duplicative services and affects a more efficient use of resources. To be considered a candidate for implementation, route proposals should increase access to opportunities for SEPTA customers.

SEPTA is proposing to adopt a **Route Directness Formula** to evaluate route deviations and patterns. This calculation, which determines the impact that a pattern or deviation has on through-riding customers, is adapted from similar formulas used by other transit agencies, including King County Metro in Seattle, Washington and the Regional Transportation District in Denver, Colorado.

The **Route Directness Formula** quantifies the impact on through-riding customers by multiplying the number of riders traveling through a pattern or deviation by the amount of time, in minutes, that deviation takes. It divides that number by the number of boards and alights along the pattern or deviation to determine the number of passenger minutes that deviation or pattern costs. Service Planning recommends adopting a threshold of eight passenger minutes for a deviation or pattern to be recommended for implementation. Existing deviations or patterns that do not meet the eight minute threshold will be identified as candidates for possible intervention.

To clarify how this calculation works, this is an example of a deviation implemented on Route 52 a decade ago to Park West Town Center. Based on recent ridership weekday passenger counts, there are approximately 3,100 passengers travelling through this deviation on a daily basis, the deviation to the shopping center takes two minutes. There are 1,000 boards and alights within the deviation. This results in the deviation counting for 6.2 passenger minutes, which would be under SEPTA's threshold and therefore an acceptable deviation.

The final recommended change is an expansion of the Service Development process. The updated process will include an additional round of public outreach focused on major transit centers or other appropriate venues. This outreach will include surveys and educational materials, and provide customers with the opportunity to interact with SEPTA Service Planning staff. The location of these events will rotate annually. In addition to a greater focus on public outreach, the new Service Development Process will formalize the participation of other SEPTA departments and external partners.

Information about the revisions to SEPTA's Service Standards and Process are on www.septa.org/service-standards.

Public Testimony

Fourteen (14) members of the public entered appearance forms and six (6) spoke at the hearings and had questions which were answered by SEPTA representatives. In addition, there were four (4) e-mails submitted by the public to the Hearing Examiner.

Philadelphia, PA Hearings – Noon, May 29, 2019

Jeffrey Cutler, a former tax collector within Pennsylvania, was first to testify. He copyrighted a money-raising proposal called "Jeffybond" as a way to provide almost unlimited free money for SEPTA, school systems, and other organizations by having people pay extra tax – by contract – instead of the State tax and get back everything else as tax-free municipal interest. He asserted it as a way to "generate billions of dollars for free with no liability". N.T. 21. With this money, SEPTA could submerge the entire

Market-Frankford Elevated system with tunnels from 69th Street to 42nd Street and in Kensington. Also, this money could fund a trackless trolley that could go on trolley tracks. He further described this vehicle as “a bus that could be a trackless trolley” ... saving SEPTA “significant amounts of money”. N.T. 23.

Brandon McBride spoke next. He wanted to discuss the Route 40 and the recovery location. He was informed that the recovery location preferred was closer to the waterfront but, because SEPTA could not get permission to go to Front Street, the recovery location is on 2nd Street. N.T. 23-26. Mr. McBride was assured that SEPTA is always open to suggestions. N.T. 26.

Douglas Diehl, President and Founder of the Tri-State Transit Center, a Historical and Transit Advocacy Group for the Philadelphia Metropolitan area and Facebook Administrator on the Metropolitan Philadelphia Transit Scene Facebook, came next. He asked that the words “frequent service route” be replaced with the words “frequent service corridor” because SEPTA has corridors where bus routes do not meet the frequent service standards of running every 15 minutes, but combined with other routes, that corridor meets the standards. N.T. 27. He cited the example of the buses running on West Chester Pike – the Routes 104, 112, 123, 126 and 120. Putting those routes together, that meets a frequent service corridor standard for every 10 minutes between 69th Street and Manoa. N.T. 27-28. Further, if you “tweaked the Route 112 to leave [69th Street Transportation Center] at 20 [past the hour] and 50 [past the hour], then you will have 15-minute frequency all day long from 69th Street out to Broomall and meet qualifications for a frequent service corridor. N.T. 28.

The Media/Sharon Hill [trolley] already meets the frequent service corridor standards between 69th Street and Drexel Hill Junction.

SEPTA could still use the word “route”, like Route 47 corridor, Route 52 corridor. N.T. 28.

Mr. Diehl also proposed a change in “frequent service” which would be “every 10 minutes or less within the City limits itself” and 15 minutes for suburban bus routes. N.T. 29.

Mr. Diehl asked for improvements in the Route 120 service and not to implement a summer schedule. He suggests major development with a new hotel at Lawrence Road and a new Giant [supermarket] will result in additional riders, especially for workers. He suggests that the Route 126 be put back on the old Route 112 routing so the hotel, the Giant and the medical center [Broomall Keystone Mercy – the Keystone Crozer Medical Building in Broomall, PA], hereinafter “Crozer Keystone”, be served by a bus route. N.T. 29-31. The SEPTA staff addressed Mr. Diehl’s concerns about the West Chester Pike summer schedule and that a brochure will be prepared to reflect service on West Chester Pike. Further, ridership to Crozer Keystone has been “very poor” and SEPTA met with Crozer Keystone management to ask them to do some additional marketing with their client base. Also, SEPTA is working with the Delaware County TMA [Transportation Management Association] which is planning on doing some outreach events at Crozer Keystone. Until SEPTA can see additional ridership generated out of those efforts, from a fiscal standpoint, it is difficult for SEPTA to look at adding additional service. N.T. 31-33.

Finally, the developer of the new shopping center will be connecting on the other side of the Blue Route and there are issues with access into that property. SEPTA cannot inconvenience through riders on West Chester Pike by going into the shopping center. So, SEPTA is looking to see if there is a way to have access from West Chester Pike in a safe manner. Marple Township and Haverford Township need to address pedestrian access in the whole area because at the current time, it is very poor. Also, you cannot get into the new shopping center and Crozer Keystone from one direction because of the way the road

network is designed. Mr. Diehl concluded the dialogue by saying he “would have no problem getting off the bus on Lawrence Road there in front of the [Crozer Keystone] complex and walking into the complex if need be”. Mr. Diehl believes it is still “safer than walking on Lawrence Road and up West Chester Pike to that bus stop at Lawrence Road. That’s dangerous there.” N.T. 33-34.

Charles Bode, Chairman of the Tri-State Citizens Council on Transportation, spoke next. He supports the four proposed bus route changes. N.T. 35.

Regarding the Service Standards, Mr. Bode wants SEPTA to think about the passengers and about convenient service as no one stands in a car or in an Uber. No one has to transfer who drives a car or takes an Uber. He returned from Richmond, Virginia and suspects its bus service would meet SEPTA’s proposed service standards. But the stops are very far apart, the bus stop signs cannot be found and service is infrequent. He and Mrs. Bode could not get around Richmond because bus service was so bad and he does not want to see this happening in Philadelphia. He wants SEPTA to “think about the passenger and generating more passengers, a lot more, before everything is Uber”. N.T. 35-36.

Finally, Mr. Bode asked for SEPTA hearings be held at a location where everyone can get in to, including those who do not have an ID card. N.T. 37.

Alfred Achtert, Jr., a citizen from Upper Darby, PA, spoke next. He supports the four route changes. N.T. 37-38. He wanted the Route 131 to go into Shannondell but he was told by the SEPTA staff that Shannondell did not want SEPTA buses on its property. N.T. 38-39.

Mr. Achtert then addressed changes to the Service Standards.

His concern about using the Scatterplot Graph [discussed above on page 7] is that “any time you’re grading on a curve, somebody fails”. He prefers a standard that below a certain fixed standard, not a percentage, that it is acceptable. N.T. 39.

As to classification of routes, Route 108 is listed in the city classification. Given that the north end of Route 108 operates in the suburbs – it operates out of the Victory Garage [in Upper Darby, PA], it is debatable if it should be city or suburban. N.T. 40.

Route 93 and 96 are listed as arterial. He suggests a subcategory of arterial – suburban arterial routing – so as to recognize that there are different standards for suburban services. N.T. 40.

Station performance was Mr. Achtert’s next focus. Eliminating stops makes it difficult for people who have mobility issues to get to the stops. N.T. 40-41.

Benjamin She, Co-Chair of the Transit Committee for 5th Square, a political action committee in Philadelphia focusing on urban and transit issues, spoke next.

Mr. She wanted to comment on issues regarding SEPTA’s new Service Standards which will surely inform the work being done under Comprehensive Bus Network Redesign (“CBNR”). Mr. She applauded the SEPTA Service Planning Department for its excellent work in updating a valuable document. N.T. 42.

Within the context of CBNR, the new service standards are great at categorizing and contextualizing existing transit service options route by route. However, we feel this does not

take into account transit service as a broader matter of geographic neighborhoods or general commute patterns between neighborhoods. We believe that for CBNR to have the greatest benefit for Philadelphia, what is needed is analysis on a broader scale, conceptualizing service from the abstract to the concrete or from the ground up. Even if a current route currently displays high-performing metrics, there is always a chance to better understand how these routes perform and interact with other routes through a more system-wide analysis, e.g., the reason for high-performing routes could be that it actually captures more riders due to surrounding routes being drastically inferior by design, which calls for better balancing service all around. N.T. 42-43.

Mr. She pointed to Jarrett Walker & Associates' firm, which in studying bus network designs, always calls for a "blank slate" approach, i.e., deliberately not considering what your network does now – "retain[ing] the strongest features of your existing network, but ... also let[ting] you discover new patterns of flow that are a better fit for your system as it is today". N.T. 43-44.

As an example, in the section on Bus Route Spacing and Duplicative Services, there are sections listed where duplicative service is supposedly unavoidable, such as shared corridors on Chestnut and Walnut Streets. However, a missing exception indicative of network-level analysis would be for parallel routes that help alleviate overburdening of trunk routes. It is this level of analysis which should be more carefully incorporated into the Service Standards and CBNR altogether. Because a network-level analysis is so important, this tends naturally to studying and conducting the bus network through geographically-based consultation and meetings whether by neighborhood or by operating district. This is happening in New York City, with MTA's regional bus operations, although service there is split up by borough, while in Philadelphia, much of the same is true depot by depot. N.T. 44-45.

Mr. She closed by noting that ridership across the entire system is still falling drastically, which could severely hurt SEPTA's formula grant funding and fare revenue in general. He does not want to see Philadelphia in the midst of a transit ridership death spiral, as many U.S. cities are. Any passenger-focused investment that increases the convenience and reliability of service should generally be viewed affirmatively, and not as a matter of, 'how can we hold off this improvement for as long as possible without the riders getting mad'. If funding is not currently available for such an improvement, then it should be formalized and included on a public-facing "wish list", and riders should be wholeheartedly invited to state their opinions and desires frequently and freely. A coordinated effort with rider advocacy groups, such as 5th Square, would be most welcomed. N.T. 45.

Mr. Achtert came back to continue his comments on the Service Standards.

He spoke next on route deviations. In suburban areas, where you don't have frequency of service or numbers of people living in a relatively compact area wanting to travel – the tendency is to have one route "be all things to all people". So you end up with the Route 99, which takes an hour to go from Norristown to Phoenixville, whereas the former Schuylkill Valley Line buses used to take one-half hour because it went up Main Street and straight out Egypt Road until it got to Montclair and then went into Phoenixville. Now Route 99 goes to King of Prussia and then to the Collegeville post office on Providence Town Center up on Route 29 and 422 and then back down again. N.T. 46.

Spacing is an issue on bus stops. Mr. Achtert asked that SEPTA stop redistricting or rebalancing and eliminating stops. Stops should be near side stops so people can more easily transfer from one route to another. The far side stop tends to drift further and further away from the intersection resulting in a walk of up to a block for a transfer at the same point. N.T. 47-48.

On a route crossing such as Roosevelt Boulevard, it makes sense to have a near stop and a far stop but, in general, stops should be near side. He specifically opined that the Route 126 does not make a far side Eagle Road stop on West Chester Pike because of the shopping center and then goes a block to make a left hand turn on to Glendale Road. He suggests that SEPTA bus operators can get across two lanes of traffic to make this maneuver. N.T. 48.

Quality of Service was next addressed. The span of service should not be from the start of the morning to the end of the night since Philadelphia is a major city. N.T. 48-49.

Service is not operated on certain routes on Saturdays and Sundays and it appears this is because "that's the way we've always done it". N.T. 49.

Frequency of Service should be 30 minutes – the maximum wait for a vehicle. Perhaps 60 minutes in the suburbs but nothing beyond that. Headways of 35 minutes "are rather silly". N.T. 49.

Load Factors is a concern. You should not be having people stand on the vehicle, especially for long periods of time, off peak. It's acceptable for peak hours, for short times. N.T. 50.

[Federal Transit Administration] Title VI requirements were next discussed. SEPTA should have a listing of minority low income routes. N.T. 50.

Mr. Achtert wanted to know why a public hearing is not required for limited service routes and asked for the definition of "limited service routes". He suggested that the Route 91, which takes individuals from the Norristown Transportation Center to Graterford Prison – three trips a week – is an example of a very limited service route. N.T. 50-51.

Mr. Achtert asked that fare kiosks for the Key System be at all loops in addition to the rail stations and high speed stations. N.T. 51.

Regarding the Automatic Passenger Count, Mr. Achtert wanted to know how SEPTA counts passengers who have ridden the vehicles on overcrowded routes. He fears such counts on overcrowded routes may be unreliable. N.T. 51-52.

"Owl" routes [all night service] were the next focus. He observed that Route 73 is an Owl route. It is way down on performance standards with a 24% operating ratio, carrying 2,227 passengers on a daily basis. Twenty-nine (29) routes on the list have at least an equal operating ratio. But they do not have Owl service. He called for the restoration of additional Owl service on other routes. N.T. 52-53.

Finally, Mr. Achtert did not see the Norristown High Speed Line, the Market-Frankford Elevated or the Broad Street Subway on the Route Performance Evaluation Report. He was informed that the Norristown High Speed Line is on page 17 of that report. N.T. 54-55.

Jeffrey Cutler came back to the podium. He opined that "this all comes down to money and essentially service has been cut because of money". N.T. 56.

Mr. Cutler asked SEPTA to provide a means where text messages could be sent to find out where the next bus or transit system vehicle is going to be and he was informed by the SEPTA staff of the SEPTA "app" [for "smart phones"] giving that same information. N.T. 56-57; 58.

Mr. Cutler closed by saying that SEPTA does not have the ability to experiment because, without extra money, it has to micromanage every marketing decision. N.T. 57.

Those who entered appearance forms at the Noon Philadelphia hearing but who did not testify include Charles Krueger, Patricia Ellis DiNatale, Office of Transportation, Infrastructure and Sustainability (oTIS) of the City of Philadelphia, and Lee Wall, SEPTA Citizens Advisory Committee.

Philadelphia, PA Hearing – 5:00 P.M., May 29, 2019

No one from the public chose to testify. Only Thomas Hastings from the Delaware County Planning Department entered his appearance form.

Route Performance Analysis

As a part of the Annual Service Plan, a detailed analysis of all routes is performed to determine various operating characteristics. The following routes fall below the acceptable operating ratio levels and will be considered for future modifications in an attempt to raise their operating ratios.

City Transit Division

(Routes at or below 18%)

<u>Route</u>	<u>Operating Ratio</u>
38	17%
89	17%
1	17%
61	17%
80	16%
Boulevard Direct	16%
62	13%

(Routes with suburban characteristics below 16%)

<u>Route</u>	<u>Operating Ratio</u>
27	15%
35	13%

Suburban Transit Division

(Routes at or below 14%)

<u>Route</u>	<u>Operating Ratio</u>
133	13%
95	13%
128	12%
91	12%
92	11%
206	8%
150	7%

Regional Rail Routes

(Routes below 25%)

Airport Line	19%
--------------	-----

Regional Rail Station Boardings

(Below 75 daily boarding or alighting passengers)

Station	Line	Weekday Boarding	Weekday Alighting
Highland	Chestnut Hill West	70	55
Crestmont	Warminster	66	74
Wister	Chestnut Hill East	64	49
Wynnefield Ave	Cynwyd	58	49
New Britain	Lansdale-Doylestown	50	44
North Phila.	Chestnut Hill West	45	24
Eddystone	Wilmington-Newark	43	43
49th Street	Media-Elwyn	42	49
Angora	Media-Elwyn	26	28
Link Belt	Lansdale-Doylestown	23	20

Hearing Examiner's Recommendations

The proposed FY 2020 Annual Service Plan does not include any major reductions in the service levels or significant diminishment of transit service.

Your Hearing Examiner recommends that the FY 2020 Annual Service Plan be adopted with respect to Route 40, Route 73, Route 104 and Route 131 and that the proposed changes to SEPTA's ***Service Standards and Process*** document be fully implemented.

Respectfully submitted,

A handwritten signature in dark ink, reading "Eugene N. Cipriani". The signature is fluid and cursive, with the first name "Eugene" and last name "Cipriani" clearly legible. The middle initial "N." is smaller and positioned between the first and last names.

Eugene N. Cipriani

Hearing Examiner

June 10, 2019

cc: Pasquale T. Deon, Sr., Chairman
Thomas E. Babcock, Vice Chairman
Joseph E. Brion, Esquire
Michael A. Carroll, P.E.
Beverly Coleman
Robert D. Fox, Esquire
Honorable Stewart J. Greenleaf, Esquire
Kevin L. Johnson, P.E.
John I. Kane
Obra S. Kernodle, IV
Daniel J. Kubik
Kenneth Lawrence, Jr.
William J. Leonard, Esquire
Honorable Charles H. Martin
Marcy Toepel

Jeffrey D. Knueppel, P.E.