the heartbeat of HAMPTON ROADS TPO
TRANSPORTATION PLANNING ORGANIZATION

MOLLY J. WARD, CHAIR · ALAN P. KRASNOFF, VICE CHAIR
DWIGHT L. FARMER, EXECUTIVE DIRECTOR/SECRETARY

September 17, 2013

Commonwealth of Virginia
Department of Rail & Public Transportation
600 East Main Street, Suite 2102
Richmond, VA 23219
Attn: Public Information Office

RE: Draft Performance Based Operating Assistance Allocation Methodology – Comments

To Whom It May Concern:

On behalf of the Hampton Roads Transportation Planning Organization (HRTPO), the designated Metropolitan Planning Organization for the Hampton Roads metropolitan planning area in southeastern Virginia, I wish to take this opportunity to submit our comments regarding the Draft Performance Based Operating Assistance Allocation Methodology.

If I can be of further assistance, please do not hesitate to contact me at 757-420-8300 or dfarmer@hrpdcva.gov.

Sincerely,

Dwight L. Farmer

Dwight L. Farmer
Executive Director/Secretary

/kg

Attachment

Copy: Molly J. Ward, HRTPO Board Chair
Alan P. Krasnoff, HRTPO Board Vice-Chair

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DRPT PERFORMANCE-BASED OPERATING ASSISTANCE ALLOCATION METHODOLOGY HRTPO STAFF COMMENTS

September 13, 2013

Comments on DRPT Performance Based Operating Assistance Allocation Methodology
HRTPO Staff Comments (in *Red, Italics*)
September 2013

Comments by Page Number

Page 2:

".....Operating assistance funding above $160M"

In the interest of clarity, If the $160M will be distributed according to existing formulae, please say so.

It would be helpful to briefly mention how transit funding has been allocated in the past so individuals reading this report can readily see the difference in the new methodology.

It would be helpful to explain where the $160M figure comes from and why the performance-based methodology only applies to funding above this figure.

The second paragraph seems to present the information in the wrong order. It is suggested that the following order be used instead:

Ending the first sentence after "annually".
Following the first sentence with an explanation of the model and measures on which the performance-based allocations will be based.
Finally, explaining the phased approaches for FY 2014 and FY 2015.

HRTPO staff's understanding is that transit agencies will be grouped based on some type of sizing criteria and will be measured against only other agencies within the same group. There is no mention of this in the draft, other than some references to "system sizing".

"Net Cost per Passenger" – The definition is unclear:

Less depreciation of what? (Rolling stock, all agency equipment?)
Is it Total Operating Cost – Depreciation + Operating Income from Other Sources; or Total Operating Cost – (Depreciation + Operating Income from Other Sources)? A math equation would probably be helpful.

The portion in parentheses refers to "non-operating income". It is unclear to what this statement refers. If it is meant to clarify "operating income derived from a source other than taxpayers", then you should not refer to this type of income as "operating income".

"Transit System Sizing" – The definition is unclear and there is no mention in the draft about how this sizing is to be used. In the definition provided, it appears a comma is missing between "available" and "net" in the second line.

Pages 2 and 3:

"Transit System Sizing: Based equally on most recent annual ridership and most recent audited operating cost available net of depreciation, projects funded in other DRPT programs, and non-transit related expenses"

Please state how the sizing is to be used. If you intend to group transit systems by size and have them compete for funding only within their group, then say so and describe how the available money will be split between the groups (before it is divided among members of the group).
Concerning "other DRPT programs", identify the initial DRPT program to which "other DRPT programs" are contrasted (i.e. define "other DRPT programs").

Page 3:

"Operating Cost for Performance Metric" – This definition is unclear for the same reasons as mentioned under Item 5. Should this definition include "divided by ridership"?

"Fixed Route and Commuter Bus Service" –What is the purpose of including this definition?

"Layover and Recovery Time" – This definition refers to the "transit operator" in the third line. In this context, it appears the transit operator is a bus (or possibly train) driver. Since "transit operator" is used to refer to a transit agency in other parts of the draft, a different term should be used to refer to an individual that operates a bus or train.

"Fixed Route and Commuter Bus Service"
It appears that the "RELATED DEFINITIONS" (pages 3 and 4) are intended to define items on page 2, but the term "Fixed Route and Commuter Bus Service" is not used on page 2.

Page 4:

"The definition of revenue miles and revenue hours..."
HRTPO staff recommends following this statement with definitions of "Revenue Miles" and "Revenue Hours".

"based on the percent change from FY 2011 to FY 2012"
Please specify the variable for which "percent change" is to be calculated.
Please specify how "percent change" will be used to divide available funding among systems. For example, if $100k will be divided between two systems (A and B), and System A has 12% change and System B has 10% change, what portion of the $100k goes to System A and what portion goes to System B?

"Implementation Plan" – For additional clarity, HRTPO staff suggests adding "(HB2313)" between "package" and "passed".

"FY 2014 Mid-Year Performance-Based Operating Assistance Allocation" – The bullet is unclear:

> *Self-comparison of what?*
> *Percent change of what?*
> *It appears the portion of the sentence following "FY 2012" can be deleted.*
> *The model is not mentioned here, but is referred to under the Phase II explanation on page 5 as the same model ". . . as in the FY 2014 mid-year performance-based operation assistance allocation."*

Pages 2 and 5:

"two-year rolling average using FY 2011, FY2012, and FY 2013 performance data"
It is not clear to this reader what this means. A two-year average of FY11 and FY12 would provide one number; and a two-year average of FY12 and FY13 would provide another number. Which number would be used to allocate funding? If both numbers, how would they be combined?

Page 5:

References to a two-year rolling average using FY 2011, FY 2012, and FY 2013 year performance data are unclear here and elsewhere in the draft. Please explain the two-year rolling average.