



MENDOCINO COUNCIL OF GOVERNMENTS

525 South Main Street~Ukiah~California~95482
www.mendocinocog.org

NEPHELE BARRETT, EXECUTIVE DIRECTOR

Administration: Suite B
(707) 463-1859
Transportation Planning: Suite G
(707) 234-3434

SOCIAL SERVICES TRANSPORTATION ADVISORY COUNCIL

AGENDA

Monday, November 16, 2020
10:00 a.m. to approx. 12:00 p.m.

Teleconference - Remote Zoom Meeting

Participants must register in advance for this webinar at:

<https://us02web.zoom.us/j/85040046911?pwd=TDlralpFUKV2ZHNjalkwTWI1QTJ5dz09>

Audio Call-in Option: 1 (669) 900-6833 (in CA)
Meeting ID: 850 4004 6911 Passcode: 755013

1. Call to Order & Introductions
2. Public Expression – *No Action*
3. Minutes of May 26, 2020 – *No Action*
Due to the length of time between meetings, members have already been provided opportunity to provide comments and corrections, and the minutes have been finalized. They are provided here for information.
4. 2022 Regional Transportation Plan (RTP) Update – *verbal report*
5. Presentation: Draft Mendocino County Coordinated Public Transit-Human Services Transportation Plan – *Discussion and comments on the draft plan*
6. Annual Review of SSTAC Membership
7. 2020/21 Unmet Transit Needs Workshop and Recommendation – *Compile a list of Unmet Transit Needs and identify other transportation needs and potential solutions*
8. Miscellaneous / Information / Announcements
9. Adjournment

PUBLIC EXPRESSION

Participation is welcome in Council meetings. Comments will be limited to three minutes per person and not more than ten minutes per subject, so that everyone can be heard. “Public Expression” time is limited to matters under the Council's jurisdiction that may not have been considered by the Council previously and are not on the agenda. No action will be taken. Members of the public may comment also during specific agenda items when recognized by the Chair.

AMERICANS WITH DISABILITIES ACT (ADA) REQUESTS

To request disability-related modifications or accommodations for accessible locations or meeting materials in alternative formats (as allowed under Section 12132 of the ADA) please contact the MCOG office at (707) 463-1859, at least 72 hours before the meeting.

POSTED 11.9.2020

MINUTES

Social Services Transportation Advisory Council

May 26, 2020

Teleconference Only - Remote Zoom Meeting

MEMBERS PRESENT

Richard Baker, Willits Senior Center
Kathy Sheehy, Ukiah Senior Center
Diana Clarke, Ukiah Senior Center – Alternate*
Jacob King, Mendocino Transit Authority
Dawn White, Mendocino Transit Authority - Alt.*

STAFF PRESENT

Nephele Barrett
Janet Orth
Monica Galliani

MEMBERS EXCUSED/ABSENT

Sheila Keys, Redwood Coast Regional Center
Doris Sloan, Consolidated Tribal Health
Jill Rexrode, Redwood Coast Seniors

MEMBER VACANCIES

“Potential ‘handicapped’ transit user”
“Potential transit user at least 60 years of age”

* USC Alternate not voting at this meeting.
MTA Alternate voting due to its two seats.

- 1. Call to Order & Introductions.** The meeting was called to order at 10:07 a.m. Introductions were made.
- 2. Public Expression.** None.
- 3. Minutes of December 9, 2019.** The minutes from the December meeting were included in the packet for information and reference. Due to the length of time between meetings, the minutes had been finalized. Janet thanked those who reviewed and commented on the draft minutes. No action was taken.
- 4. Review and Recommendation on MTA’s Analysis and Prioritization of 2020/21 Unmet Transit Needs.** Janet described the annual process to date, the Transit Productivity Committee (TPC) recommendation that “there are no unmet transit needs that are reasonable to meet,” and next steps, as detailed in her written staff report. MCOG’s Board of Directors will make a formal finding by resolution as part of budget adoption at its June 1 meeting. It was noted some of the same participants today had attended the April TPC meeting. Nephele added that even though none of the identified needs may be reasonable to meet, there could be other avenues to pursue meeting some of them through grants and other means.

Dawn joined the meeting during staff’s overview.

Discussion included:

- There is risk of losing service if funding is at peril for senior centers, with potential loss of door-through-door service. (Diana)
- A loss of funding does not meet the definition of an unmet need, however needs could be created by it. (Nephele)
- The federal CARES Act funding is anticipated to cover losses of local transit revenues. There were no new details available on that program. (Janet, Dawn)
- So a cautionary approach should be taken, due to COVID-19 economic impacts. (Richard)
- The federal relief funds are to come through the FTA Section 5311 program, hopefully to balance budgets in the end. Can senior centers apply directly, or just MTA? It was assumed only MTA is directly eligible. (Nephele, group)

Staff called for the question and final review of any needs on the list if desired. Nephele noted that some needs in the analysis were identified as already existing, since the original list was purposely unfiltered before MTA’s report.

Richard moved, seconded by Kathy, to take the same approach as the TPC; that is, with caution due to the financial uncertainty, so that “there are no unmet transit needs that are reasonable to meet for FY 2020/21.” **Discussion on the motion:** Would there be any opportunity to revisit needs during the year if conditions change? Nephele reported the process is annual, so it will be closed; she repeated that a need could be met if the opportunity arises. The next cycle begins again in November, so there may be a better indication of the financial situation then.

Jacob joined the meeting during discussion. The motion was repeated before taking action.

Recommendation:

Upon motion by Baker, seconded by Sheehy, and carried unanimously on roll call vote (*4 Ayes – Baker, Sheehy, King, White; 0 Noes; 3 Absent*), the SSTAC recommends a finding that there are no unmet transit needs that are reasonable to meet for Fiscal Year 2020/21.

5. Discussion/ Recommendation on Any Other Transportation Issues. Diana asked MTA members whether there had been any progress on senior center contracts for the new fiscal year. Dawn offered to consult with Executive Director Carla Meyer and would meet with her after adjournment of this meeting. It was noted that MTA had formally claimed from MCOG the same level of Local Transportation Funds for the senior centers transportation program as for FY 2019/20, and this amount was included in MCOG’s proposed FY 2020/21 budget. No new recommendations were proposed and no action taken.

6. Miscellaneous / Members’ Concerns / Announcements. Janet reviewed status of SSTAC membership, reporting that two members whose seats expired in April had agreed to be reappointed, for approval on MCOG’s June 1 agenda. The third expired membership was a duplicate seat. There remain two vacancies for non-agency potential transit riders. In discussion, members agreed to watch for any volunteers.

Richard reported the Willits Senior Center plans to re-open its thrift shop June 1, pending logistics to comply with the public health order.

Diana asked about progress on a new funding formula for senior centers transportation. Nephele reported that options were presented but a recommendation postponed until the TPC can meet in person; since the change would not take effect until FY 2021/22, there is some time to work on it more.

Discussion followed on the current health order in regard to meetings. Is MTA bringing back any staff onsite? Dawn reported re-entry was occurring slowly, and there were still some layoffs. Jacob reported no service changes, i.e. no new reductions in service beyond the cuts to out-of-county routes and frequency of trips. He has been present onsite at MTA throughout the pandemic emergency.

Janet thanked the members for participating throughout the year, it has been very helpful. She noted no further SSTAC meetings are on the schedule until November; however if there is a reason to meet, the SSTAC may convene earlier (there is no prescribed frequency of meetings).

8. Adjournment. With no further business, the meeting was adjourned at 10:41 a.m.

Submitted by Janet Orth, Deputy Director / CFO



SOCIAL SERVICES TRANSPORTATION ADVISORY COUNCIL

STAFF REPORT

TITLE: Coordinated Public Transit – Human Services Transportation
Plan – 2020 Update

DATE PREPARED: 11/05/20

SUBMITTED BY: Loretta Ellard, Deputy Planner

MEETING DATE: 11/16/20

BACKGROUND:

The 2015 Coordinated Public Transit – Human Services Transportation Plan (Coordinated Plan) was adopted by MCOG on March 2, 2015, and the required five-year update is currently underway. As was done with the 2015 plan, MCOG is working in partnership with the University of the Pacific’s Center for Business and Policy Research to develop the 2020 update. This project is being funded by the State as part of a larger umbrella contract undertaken for several rural agencies.

An “outreach draft” of the Coordinated Plan update has been posted to MCOG’s website for stakeholder and public review. As part of the meeting on November 9, SSTAC members will have an opportunity to hear a presentation from Thomas Pogue, CBPR, and provide input on the draft plan update.

Additional stakeholders have also been invited to participate in this virtual outreach workshop which has been combined with the regular SSTAC meeting, for efficiency. We encourage participants to review the draft plan and provide input on social service transportation needs (including those of seniors, low-income, and disabled individuals), and discuss other issues pertinent to social service transportation and coordination in the county.

To review the Draft Coordinated Plan for Mendocino County before the meeting, download the plan at this link:

[MendocinoCoordinatedPlanOutreachDraft202010.pdf](#)

The draft plan may also be viewed on MCOG’s website at www.mendocinocog.org.

ACTION REQUIRED: Review draft plan, receive consultant presentation, and provide input on draft Coordinated Plan – 2020 update.

ALTERNATIVES: N/A

RECOMMENDATION: Review draft plan, receive consultant presentation, and provide input on draft Coordinated Plan – 2020 update.

/le



SOCIAL SERVICES TRANSPORTATION ADVISORY COUNCIL

STAFF REPORT

TITLE: Annual Review of SSTAC Membership

SUBMITTED BY: Janet Orth, Deputy Director / CFO

DATE PREPARED: 11.6.2020

BACKGROUND:

The Transportation Development Act (TDA) mandates that Regional Transportation Planning Agencies maintain a Social Services Transportation Advisory Council (SSTAC), with members representing specific segments of the population.

Two of nine prescribed seats are currently vacant, and three are due for reappointment this April, if the members are willing to continue serving.

Vacancies are as follows:

- “Potential transit user at least 60 years of age”
Vacant seat, term is through April 2021
- “Potential handicapped transit user”
Vacant seat, term is through April 2022
- “Representative of local Consolidated Transportation Services Agency”
Mendocino Transit Authority - vacant seat, term is through April 2023
Alternates: Dawn White, MTA is currently serving

Positions due for reappointment are as follows:

- “Local social service provider for seniors”
Reappoint through April 2024
Richard Baker, Willits Seniors, Inc.
Dena Eddings (Interim), Area Agency on Aging
- “Local social service provider for seniors that provides transportation”
Reappoint through April 2024
Jill Rexrode, Redwood Coast Seniors
Alternates: Steve Jordan and Laurie Hill, Redwood Coast Seniors

Dena Eddings, Area Agency on Aging, has agreed to continue serving the current term as an interim member under “Local social service provider for seniors.” More than one member has been appointed to this seat. We invite AAA to propose a member for this seat to fulfill the next term through April 2024.

Please refer to the attached chart of current representation. Terms are for three-year, staggered terms. At this meeting we would like to nominate current members for reappointment as well as potential new members to fill the vacancies. The nominations would then be presented to the MCOG Board to make formal appointments.

ACTION REQUIRED:

Nominate members for reappointment, and identify new members to fill vacancies.

ALTERNATIVES:

The SSTAC may submit additional names for consideration. MCOG may appoint more members than the nine prescribed by law. Maintenance of this advisory council is a statutory requirement. Recruitment may be considered an ongoing, or at least periodic, pursuit.

RECOMMENDATION:

Nominate members for reappointment, and identify new members to fill vacancies.

Enclosures:

SSTAC Membership Roster as of June 2020

Transportation Development Act (TDA) excerpt - SSTAC



Social Services Transportation Advisory Council (SSTAC)

Membership Roster
Approved June 1, 2020

Position	Name	Alternate	Agency	Term Expires
Local social service provider for seniors	Richard Baker	Priscilla Tarver	Willits Seniors, Inc.	April 2021
	Dena Eddings, Interim		Area Agency on Aging	April 2021
Local social service provider for seniors that provides transportation	Jill Rexrode	Steve Jordan	Redwood Coast Seniors	April 2021
		Laurie Hill		
Potential transit user at least 60 years of age	<i>Vacant</i>			April 2021
Potential “handicapped” transit user	<i>Vacant</i>			April 2022
Local social service provider for the handicapped that provides transportation	Kathy Sheehy	Diana Clarke	Ukiah Senior Center	April 2022
		Heather Haydon		
Representative of local Consolidated Transportation Services Agency	Jacob King		Mendocino Transit Authority	April 2022
Representative of Local Consolidated Transportation Services Agency	Carla Meyer	Dawn White	Mendocino Transit Authority	April 2023
Local social service provider for the handicapped	Sheila Keys		Redwood Coast Regional Center	April 2023
Local social service provider for persons of limited means	Doris Sloan		Consolidated Tribal Health	April 2023

Social Services Transportation Advisory Council

99238

Each transportation planning agency shall provide for the establishment of a social services transportation advisory council for each county, or counties operating under a joint powers agreement, which is not subject to the apportionment restriction established in Section 99232.

- (a) The social services transportation advisory council shall consist of the following members:
 - (1) One representative of potential transit users who is 60 years of age or older.
 - (2) One representative of potential transit users who is handicapped.
 - (3) Two representatives of the local social service providers for seniors, including one representative of a social service transportation provider, if one exists.
 - (4) Two representatives of local social service providers for the handicapped, including one representative of a social service transportation provider, if one exists.
 - (5) One representative of a local social service provider for persons of limited means.
 - (6) Two representatives from the local consolidated transportation service agency, designated pursuant to subdivision (a) of Section 15975 of the Government Code, if one exists, including one representative from an operator, if one exists.
 - (7) The transportation-planning agency may appoint additional members in accordance with the procedure prescribed in subdivision (b).
 - (b) Members of the social services transportation advisory council shall be appointed by the transportation planning agency which shall recruit candidates for appointment from a broad representation of social service and transit providers representing the elderly, the handicapped, and persons of limited means. In appointing council members, the transportation-planning agency shall strive to attain geographic and minority representation among council members. Of the initial appointments to the council, one-third of them shall be for a one-year term, one-third shall be for a two-year term, and one-third shall be for a three-year term. Subsequent to the initial appointment, the term of appointment shall be for three years, which may be renewed for an additional three-year term. The transportation-planning agency may, at its discretion, delegate its responsibilities for appointment pursuant to this subdivision to the board of supervisors.
-

- (c) The social services transportation advisory council shall have the following responsibilities:
- (1) Annually participate in the identification of transit needs in the jurisdiction, including unmet transit needs that may exist within the jurisdiction of the council and that may be reasonable to meet by establishing or contracting for new public transportation or specialized transportation services or by expanding existing services.
 - (2) Annually review and recommend action by the transportation-planning agency for the area within the jurisdiction of the council, which finds, by resolution, that (A) there are no unmet transit needs, (B) there are no unmet transit needs that are reasonable to meet, or (C) there are unmet transit needs, including needs that are reasonable to meet.
 - (3) Advise the transportation-planning agency on any other major transit issues, including the coordination and consolidation of specialized transportation services.
- (d) It is the intent of the Legislature that duplicative advisory councils shall not be established where transit advisory councils currently exist and that those existing advisory councils shall, instead, become part of the social services transportation advisory council and shall assume any new responsibilities pursuant to this section.
-

Citizen Participation Process

99238.5

- (a) The transportation planning agency shall ensure the establishment and implementation of a citizen participation process appropriate for each county, or counties if operating under a joint powers agreement, utilizing the social services transportation advisory council as a mechanism to solicit the input of transit dependent and transit disadvantaged persons, including the elderly, handicapped, and persons of limited means. The process shall include provisions for at least one public hearing in the jurisdiction represented by the social services transportation advisory council. Hearings shall be scheduled to ensure broad community participation and, if possible, the location of the hearings shall be rotated among the various communities within the advisory council's jurisdiction. Notice of the hearing, including the date, place, and specific purpose of the hearing shall be given at least 30 days in advance through publication in a newspaper of general circulation. The transportation-planning agency shall also send written notification to those persons and organizations, which have indicated, through its citizen participation or any other source of information, an interest in the subject of the hearing.

 - (b) In addition to public hearings, the transportation-planning agency shall consider other methods of obtaining public feedback on public transportation needs. Those methods may include, but are not limited to, teleconferencing, questionnaires, telecanvassing, and electronic mail.
-



SOCIAL SERVICES TRANSPORTATION ADVISORY COUNCIL

STAFF REPORT

TITLE: Fiscal Year 2021/22 Unmet Transit Needs Workshop

SUBMITTED BY: Janet Orth, Deputy Director / CFO

DATE: 11.6.2020

BACKGROUND:

MCOG's Social Services Transportation Advisory Council (SSTAC) meets annually to generate a list of Unmet Transit Needs, which is then forwarded to MCOG's Board of Directors and Transit Productivity Committee for budget consideration, with analysis by Mendocino Transit Authority. The SSTAC has an opportunity to comment on the analysis before the Board adopts a finding. My description of this process is attached for your reference.

Last year, a finding was made that there were no needs that were reasonable to meet for Fiscal Year 2020/21.

Mendocino Transit Authority (MTA) also invites public input and compiles a list of unmet transit needs during the year; we can review this and include it on the SSTAC's list as usual.

This is an opportunity to have a broad-ranging discussion about how well transportation is working or not in your community. Does it serve your needs or those of your clientele? Where are the gaps? If traditional methods of providing public transportation are not available to all who need it, what other ways could be investigated? We are interested in hearing any and all ideas for ways to meet these needs. This workshop is one of the ways the SSTAC's responsibilities can be fulfilled.

What else is important to you and/or your constituents? In addition to needs that meet MCOG's adopted definitions for "unmet transit needs," you have authority to make further recommendations as the Social Services Transportation Advisory Council to this planning agency.

In the workshop, we can develop two separate lists: one of "unmet transit needs" to be evaluated with MTA, and the other (optional) for advice directly to MCOG as the transportation planning agency on any other transportation modes or related issues.

ACTION REQUIRED: Develop a list of "unmet transit needs" according to MCOG's definition (attached).

ALTERNATIVES: Share your experiences from the community; brainstorm ideas for transportation solutions, report any unmet transit needs, and compile other transportation recommendations for MCOG. The SSTAC could recommend the list of needs compiled by MTA during the year to date.

RECOMMENDATION:

Develop and recommend a list of unmet transit needs in Mendocino County. If desired, advise MCOG of any other transportation-related issues, as another purpose of the SSTAC according to TDA.

Enclosures:

"MCOG's Annual Unmet Transit Needs Cycle"
FY 2020/21 Unmet Transit Needs List for reference
Unmet Transit Needs Definitions

MCOG's Annual Unmet Transit Needs Cycle

On MCOG's Transportation Development Act (TDA) Budget Calendar, the Social Services Transportation Advisory Council (SSTAC) kicks off the fiscal year with this workshop.

TDA requires that before any Local Transportation Funds are allocated for streets and roads purposes (excess revenues at fiscal year end), a process is conducted to identify any "unmet transit needs" that might be "reasonable to meet" for funding.

This process also serves to meet a State requirement (Section 99238.5 of the Transportation Development Act) for citizen participation. And we believe that the annual unmet needs list is important in helping to identify priorities for best use of our limited public transit funds.

The SSTAC begins the process by compiling all known unmet transit needs for recommendation to the Mendocino Council of Governments. This list will be submitted to MCOG as testimony at a public hearing. I have attached MCOG's adopted definition of "unmet transit needs" for your reference.

At this workshop, please be prepared to report any new or continued unmet transit needs of which you are aware. The list is started fresh each year, so do not assume that any needs will be carried over from previous years. I have attached last year's list just for your reference.

Be advised that often there are not enough funds available to start any new transit service routes and that MTA is careful not to start new services that will not be sustainable. Other times it has been found that some needs could be met through minor service adjustments. So we have seen that our process can yield valuable results. Lack of available funding and our geographic challenges coupled with low population densities appear to be primary reasons that needs go unmet. Funding sources have long been a political issue statewide, with fluctuating funding levels; however Senate Bill 1, the Road Repair & Accountability Act of 2017 helped to stabilize this issue. In 2020, impacts of the coronavirus pandemic on public transit have been relieved somewhat by the federal CARES Act. The local funding from sales tax depends on health of the economy. MTA, with some help from MCOG, continues to address productivity improvements and seek new approaches. The good news is that there is an increasing awareness and demand for public transit in State mandated planning for sustainable communities, as a way to counteract various environmental impacts.

MCOG encourages ideas from the SSTAC for transportation solutions. Our experience tells us that with repetition and perseverance, some of these good ideas can eventually be implemented.

J. Orth
11/8/2012
11/4/2013-rev
11/4/2014-rev
11/7/2018-rev
11/6/2020-rev



MENDOCINO COUNCIL OF GOVERNMENTS

FY 2020/21 Unmet Transit Needs Testimony Heard in Public Hearing

February 3, 2020
(not in any order of priority)

Needs Identified at the SSTAC workshop:

1. Passenger van for expanded service to remote or inaccessible areas in Ukiah Senior Center's service territory
2. Reconsider a pulse system at the Navarro Junction for buses to Fort Bragg, Ukiah, Gualala and Point Arena
3. Service for disabled transit riders on inaccessible roads and driveways
4. Wheelchair accessible door-through-door assisted services for seniors and disabled adults on Wednesdays in the Ukiah area
5. Weekend and after-hours rides for seniors and disabled adults.

Needs Identified by Mendocino Transit Authority (MTA):

1. Increased round trips between Ukiah and Hopland – evening, morning and weekend
2. Increased weekend round trips between Santa Rosa and Fort Bragg
3. Increased service along Highway 1 to and from Fort Bragg
4. Increased service between Willits and Fort Bragg, and Fort Bragg and Mendocino
5. Service to The Woods retirement community in Little River, either fixed route or as needed
6. Summer service to Todd Grove Park in Ukiah
7. Additional northbound stops in Willits
8. Brooktrails service
9. Connection with Humboldt Transit
10. Service to Covelo, Leggett, and Laytonville
11. Round trip to City of Ten Thousand Buddhas Temple in Ukiah/Talmage
12. Saturday service on Willits Local Route 1
13. Additional stop in Willits at Food Bank.

Needs Identified in Public Hearing:

The following includes both testimony received from the public at MCOG's office in advance of the hearing and testimony received in person at the hearing.

1. Non-emergency, wheelchair-accessible medical transport
2. Transportation service to the Little River area including older adults
3. Transportation to the Sanford Ranch Road area bordering Ukiah/Talmage
4. Non-emergency medical transportation need for Howard Hospital patients in Willits:
 - Patients that are being discharged and don't have anyone to take them home
 - Patients that arrived at the emergency room in an ambulance, but then must return home when they're done
 - Outpatients that need to get to appointments at the clinic.
5. Additional drivers for respite on Route 65 between Willits and Fort Bragg
6. Wednesday bus rides for adults/seniors in Ukiah

TOTAL of 24 Recommended Unmet Transit Needs for Analysis by MTA

Adopted by MCOG
11/2/92
Revised by MCOG
12/7/98

MENDOCINO COUNCIL OF GOVERNMENTS

“Unmet Transit Needs” and “Reasonable to Meet” Process

Introduction

The stated intent of the Legislature in passing the Transportation Development Act (TDA) was to provide funding for transit, which would provide an essential public service through a balanced transportation system. The TDA administrative code specifically states, “it is the intent of the Legislature to improve existing public transportation services and encourage regional public transportation coordination.” The Public Utilities Code, in Article 2, Section 99220 provides even more succinctly: “to encourage people to use public transportation rather than private vehicles.”

Prior to using TDA funds for street and road improvements, Sections 99401.5 and 99401.6 of TDA require the Regional Transportation Planning Agency to hold a public hearing and make a determination that there are no unmet transit needs that can reasonably be met within the area of a county, city or eligible operator. As a result, the RTPA has the responsibility and authority to determine what constitutes unmet transit needs and whether or not such unmet transit needs can reasonably be met.

The Mendocino Council of Governments (MCOG), acting in its official capacity as the designated Regional Transportation Planning Agency for Mendocino County, accomplishes this in part through a public hearing process conducted by MCOG taking into account the recommendations of the Social Services Transportation Advisory Council and other various factors in the transportation planning process.

Definitions

The following definitions of “Unmet Transit Need” and “Reasonable to Meet” have been adopted by the Mendocino Council of Governments.

The unmet needs and reasonableness policies apply to new proposed services. Existing services will be evaluated through the existing performance standard policies established by MCOG, and reviewed by the Transit Productivity Committee.

1. Unmet Transit Need: Whenever a need to transport people is not being satisfied through existing public or private resources.
2. Reasonable to Meet: It is reasonable to meet a transit need if all of the following conditions prevail:

“Unmet Transit Needs” and “Reasonable to Meet” Process

Page 2 of 2

12/7/98

- a) Service will be capable of meeting the Transportation Development Act fare revenue/operating cost requirements and established MCOG criteria for new services
- b) Transit services designed or intended to address an unmet transit need shall not duplicate transit services currently provided either publicly or privately
- c) The claimant this is expected to provide the service shall review, evaluate and indicate that the service is operationally feasible, and vehicles shall be currently available in the market place
- d) Funds are available, or there is a reasonable expectation that funds will become available.

/le
/jmo