Streamlining Bus Stop Permitting and Installation on Caltrans' Right of Way

Requested by
Suresh Ratnam, District 1, Division of Local Assistance

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List of Abbreviations and Acronyms

AARB	Art and Architectural Review Board
ADA	Americans with Disabilities Act
AVTA	Antelope Valley Transit Authority
BRT	bus rapid transit
Caltrans	California Department of Transportation
DGS	Department of General Services
DOT	department of transportation
DRPT	Department of Rail and Public Transportation
MTA	Metropolitan Transportation Authority
NHDOT	New Hampshire Department of Transportation
PROWAG	Public Right-of-Way Accessibility Guideline
ROW	right of way
SMART	Suburban Mobility Authority for Regional Transportation
SME	subject matter expert
TCRP	Transit Cooperative Research Program
TIGER	Transportation Investment Generating Economic Recovery
TSDG	Transit-Supportive Design Guidelines
TSP	transit signal priority
TTTF	Transit Transformation Task Force
VDOT	Virginia Department of Transportation
WAC	Washington Administrative Code
WSDOT	Washington State Department of Transportation

Executive Summary

Background

Strategically placed bus stops with amenities are crucial for a successful transit network. A lack of marked bus stops and location-specific bus stop amenities including shelter, seating and signage disproportionately affects riders, especially in rural and small urban areas. Permitting and installing bus stops with appropriate shelter amenities on the California Department of Transportation (Caltrans) right of way (ROW) may involve complicated permitting procedures that vary from Caltrans district to district, leading to significant delays and costs that rural and suburban transit agencies cannot afford.

Caltrans is seeking to reform its bus stop permitting process across all districts to reduce schedule delay and risk, lower costs and streamline implementation of bus stops on the Caltrans ROW. A streamlined permitting process that incorporates best practices and end user guidance from transit agencies and state transportation agencies across the country is expected to lower costs for rural and semiurban transit agencies.

To gather information that will aid Caltrans' review of current processes, CTC & Associates surveyed selected California transit agencies to better understand the current limitations to permitting and installing bus shelters on the Caltrans ROW and identify bus shelter permitting and installation best practices. A review of in-progress and completed domestic research examining the permitting practices of transit agencies and state transportation agencies in the U.S. supplemented survey findings.

Summary of Findings

Survey of Practice

The project panel identified 50 California transit agencies that serve rural and semiurban bus riders. Thirty-one of the 50 transit agencies surveyed responded, for a 62% response rate. Of these, five respondents indicated that their agencies had not installed bus stops on Caltrans' ROW and could not provide the information the survey was seeking.

Half of the 26 transit agencies completing the survey are served by two Caltrans districts — District 1 and District 6. The remaining respondents' bus stop permits are processed by staff in Caltrans Districts 2, 3, 5, 7 and 8.

Highlights of the survey findings are presented below in six topic areas:

- Permit application development and submission.
- Engaging with Caltrans.
- Permit processing challenges.
- Implications of permitting challenges.
- Maintenance agreements.
- Assessing the permitting process.

Permit Application Development and Submission

Seven of the 26 responding agencies (27%) have engineers on staff; another 10 (38%) have funding to engage contracted engineers and have done so. One agency contracting for engineering services noted that the use of contracted engineering significantly increased project expenses to almost two times the original projected budget (*Redding Area Bus Authority*). For agencies with neither engineers on staff nor funding to engage them, success depends on the availability of the agency staff (*Glenn Transit Service*), and limited available budget does not permit the creation of additional plan sets (*Morongo Basin Transit Authority (Basin Transit)*).

Average permit application processing time varied among respondents, with five reporting a processing time of 30 days or less (*Arvin Transit*, *City of Corcoran/Corcoran Area Transit*, *City of Ojai Trolley, Humboldt Transit Authority* and *Lake Transit Authority*). Almost 80% of the 24 agencies addressing this question reported an average processing time of 31 to 90 days. Four agencies reported average processing times of 91 or more days (*City of Wasco*, *Mountain Area Regional Transit Authority*, *Redding Area Bus Authority* and *Tulare County Regional Transit Agency*).

Engaging with Caltrans

Nearly three-quarters of the 26 responding agencies work with multiple areas of Caltrans on improvement projects and services. Sixty-nine percent of respondents work with the same Caltrans staff members on most projects seeking bus stop permits.

Transit agencies working with a range of Caltrans staff described both the differences and positive aspects of working with many different Caltrans staff members. For one respondent, communication has been fairly consistent, even with turnover and rotations (*Glenn Transit Service*). For another, the level of support "varies between ignored to enthusiastic," though this respondent also noted that "[o]ver the last year, proactive engagement from Caltrans staff with HTA [Humboldt Transit Authority] has increased significantly" (*Humboldt Transit Authority*). The Caltrans District 2 team is considered "top-notch and provide[s] decent guidance" (*Redding Area Bus Authority*).

Five respondents described assistance from Caltrans districts with engineering or design. Assistance ranged from design and development of corridor improvements (*Nevada County*) to continued consultation during an ROW permit submission for approximately 10 stops (*Redding Area Bus Authority*). District 1 took the lead on a federal study associated with the transit authority's hydrogen fueling infrastructure (*Humboldt Transit Authority*).

Only two transit agencies have requested phased improvements, which allow a transit agency to install minimal improvements before the later addition of a bus shelter (*City of Ojai Trolley* and *Yurok Tribe*). Arvin Transit requested but was not given permission to phase improvements.

Permit Processing Challenges

Some of the six transit agencies reporting on delays or difficulties in receiving permit approval offered recommendations for improving the permit review and approval process:

> ***Expedite application rejection***. Two transit agencies recommended expediting the notice of missing documents as soon as the omission is identified rather than waiting until the end of an initial 30-day review period (*City of Eureka* and *Humboldt Transit Authority*). The City of Eureka noted that wait times for approvals can sometimes be months.
>
> ***Reconsider requirements.*** Three respondents recommended relaxing requirements, with one noting that Caltrans' required reviews are more significant than what the city would perform for its own ROW (*City of Wasco*). The requirement of engineered drawings was also noted, with one agency indicating that this requirement, when coupled with the lack of engineering staff or funding to

contract for these services, essentially prohibits bus stop development for the authority (*Redwood Coast Transit Authority*). The third respondent echoed this concern:

> The requirement for complete civil drawings and structural calculations for a simple shelter replacement or installation of a pole for bus stop signage is unreasonable for small resource-constrained transit agencies (*Humboldt Transit Authority*).

Investigate administrative issues. The new Caltrans Encroachment Permit System did not appear to notify Caltrans staff when an applicant submitted system updates (*Madera County Public Works*). Staffing and availability for permit submission review are causing delays in project review and approval (*Redding Area Bus Authority)*.

When a bus stop permitting application is rejected, Caltrans may engage with the transit agency to identify a path forward. Rather than citing a specific instance of engagement when addressing a rejected application, the City of Eureka respondent instead noted that Caltrans "began talking to its different branches on how to make the application process better for smaller cities and transit authorities." Echoing a previous survey response, this respondent recommended that Caltrans identify missing documents as quickly as possible rather than waiting 30 days to issue a rejection.

Two transit agencies described rejections associated with Americans with Disabilities Act (ADA) requirements (*City of Shafter* and *Madera County Public Works*). Respondents reporting on rejected applications also noted that the district offered an unspecified alternative (*Madera County Public Works*), and the district team provided guidance on the resubmission of documents, offering clear examples of appropriate revisions (*Redding Area Bus Authority*).

Implications of Permitting Challenges

Inefficiencies or challenges in any process have consequences. Survey respondents described how their transit agencies were impacted by permitting challenges in three topic areas: bus stop placement strategies, stop locations impacted by delays and infeasible projects.

When faced with a challenging site for placement of a potential bus stop, respondents:

- Consider alternative improvements with different materials or coordinate with the respective jurisdiction when extensive work is needed to develop a plan for improvements (*Antelope Valley Transit Authority (AVTA)*).
- Relocate stops (*City of Wasco* and *Lassen Transit Service Agency*).
- Install signage (*Arvin Transit* and *Humboldt Transit Authority*).
- Make plans to improve the site, if needed (*Glenn Transit Service*), or build the necessary improvements at significant expense (*Madera County Public Works*).
- Install solar light poles in the ROW to improve visibility and enhance safety (*Redding Area Bus Authority*).

One transit authority noted that most of the areas it services could be characterized as challenging for locating bus stops (*Redwood Coast Transit Authority*). If allowed by Caltrans, this transit authority would install Simme-Seats, which provide seating at bus stop locations without a shelter. The Simme-Seat manufacturer describes these seats as "manufactured with plate steel, sandblasted and powder-coated with super-durable paint, which is made to last." The seats can be ordered with or without poles and/or dividers. The transit authority would install these seats on 2-inch Unistrut posts that also support bus stop signs.

Other transit agencies have not developed alternative strategies or opt not to install a stop at a challenging location (*Mendocino Transit Authority*, *Santa Ynez Valley Transit*, *Siskiyou County* and *Tulare County Regional Transit Agency*).

Five transit agencies reported that one or more bus stop locations are without stops due to the permitting procedure backlog. The number of stops delayed by the permitting backlog varied widely, from only a handful (*Mountain Area Regional Transit Authority*) to more than 100 stops (*AVTA*). Redwood Coast Transit Authority estimates that 30 to 40 stops are on hold; Redding Area Bus Authority has approximately 15 locations that are without stops due to the permitting backlog.

Permitting costs have made certain projects infeasible for some transit agencies. The need to develop detailed civil drawings and structural calculations for a simple shelter replacement or installation of a new pole with signage can preclude project development (*Humboldt Transit Authority*), and the cost to develop an ADA-compliant stop can delay securing adequate funding (*Madera County Public Works*). Other respondents noted that the cost to develop a bus stop can run into the hundreds of thousands of dollars — up to $500,000 — for a single stop (*Mountain Area Regional Transit Authority* and *Redwood Coast Transit Authority*).

Maintenance Agreements

The survey gathered little information regarding transit agency use of maintenance agreements. Eleven responding agencies include maintenance agreement language in the permit agreement; further details of maintenance responsibilities and practices were not solicited through the survey. None of the respondents identified how they address vandalism, trash, homelessness and other maintenance-related issues in the permit agreement.

Assessing the Permitting Process

Successes, challenges and best practices derived from respondents’ experience with bus stop permitting and installation are highlighted below.

Successes. Transit agencies have benefited from collaboration and coordination with a range of partners that include public works and community development directors, property owners, Caltrans district staff and local jurisdictions. Engagement and communication on bus stop design have also been key to successful bus stop permitting and installation.

Challenges. The survey found no consensus among respondents regarding the most significant challenges faced when permitting and installing bus stops. Below are the challenging factors respondents cited:

- Collaborating with partners.
- Complying with ADA requirements.
- Contracting.
- Cost.
- Infrastructure limitations and connectivity.
- Installation concerns.
- Limited resources.
- Obtaining approvals.
- Permitting process in general.
- Property owner engagement.
- Time required for engineering.

Best practices. Common themes identified in the best practices shared by respondents include collaborating and communicating, ensuring appropriate expertise and remaining flexible. Transit agencies standardized process improvements by:

- Choosing one bus shelter design and creating standard installation guidelines to streamline the permitting and installation process.
- Developing a template packet that meets all submission requirements.

Other Recommendations and Best Practices

Transit agencies offered other recommendations and best practices for improving Caltrans' bus stop permitting and installation process.

***Realign Responsibility* (Antelope Valley Transit Authority)**

To save time and effort in the permitting process, the planning, engineering and installation should be conducted by the jurisdiction (typically, cities) owning the ROW. Due to the lack of funding, staff, equipment and experience with installing bus stops, a transit agency must make the potentially costly decision to hire an engineering firm with the necessary expertise.

***Tighten Up Review and Remain Flexible* (Redding Area Bus Authority)**

Improving the final review and shortening return times will improve the overall permitting process and encourage smaller agencies to prepare more complex submissions. Consider moving away from a one-size-fits-all approach that allows for differing processing for certain types of submissions.

***Trim Requirements for Sign-Only Stops* (Redwood Coast Transit Authority)**

Most rural stops on Caltrans highways do not have sufficient ridership volumes to require seating and/or shelters. If adopted, current discussions of a streamlined process that requires no CAD drawings for sign-only bus stops will have a significant impact for agencies serving rural riders. Such a change will allow transit agencies to focus on providing some type of seating and shelter at the busiest Caltrans ROW locations.

***Develop Bus Stop Guidelines* (Antelope Valley Transit Authority)**

A 2018 inventory of AVTA's approximately 800 bus stops sought to provide the Lancaster Planning Commission with an update on the transit agency's bus stop improvement program. As part of this update, AVTA requested adoption of the *Bus Stop Guidelines* (see citation below), prepared by AVTA staff to aid in the installation of a new bus stop. The guidelines describe program goals, limitations and priorities, and the general state of the transit agency's inventory. The guidance also addresses bus stop design considerations and preferences, amenities, placement, maintenance and removal. Included in the appendices are an ADA requirements guide and bus stop maintenance schedule.

Related Resource:

> **Bus Stop Guidelines**, Antelope Valley Transit Authority, May 2018.
> Provided to Caltrans separately.
> *From the introduction*: This document summarizes the recommended guidelines and policies pertaining to AVTA's bus stop design, placement, maintenance, removal, amenities and improvement. In developing and implementing these policies, the AVTA works to assure optimum safety and convenience for its ridership while meeting the requirements of regulatory entities at the local, state and federal levels. Assembling these guidelines and policies in a single document also will

allow AVTA, local governments and developers to more easily incorporate transit needs into their operations plans and/or design of neighborhoods, streets, roads and commercial development.

Related Research and Resources

National research and guidance include an ongoing Transit Cooperative Research Program (TCRP) synthesis project that began in 2025 that will “provide a synthesis of current practices or examples of coordination and trigger processes that exist to provide safe and accessible bus stops in suburban or rural contexts.” A 2021 TCRP synthesis “illustrates tools and prioritization strategies for identifying target transit stops and corridors for infrastructure improvements, along with the criteria and methodologies for investment decision making.” Case studies in a Federal Transit Administration toolkit discuss ways to simplify the siting and permitting process for bus shelters and amenities.

State research and guidance begin with a California State Transportation Agency final report that describes the work of the Transit Transformation Task Force, which was established and convened by Senate Bill 125 with a mandate “to develop policy recommendations to grow transit ridership and improve the transit experience for all users.” Included in this final report are recommended strategies to “expedite delivery of transit-supportive infrastructure and strategies.”

Also cited are design guidelines and standards developed by Suburban Mobility Authority for Regional Transportation, which serves communities across the southeastern Michigan region, and the Westchester County (New York) Department of Public Works and Transportation.

Bus stop permitting policies, procedures and other guidance from state departments of transportation (DOTs) in Georgia, New Hampshire, Virginia and Washington include rules, checklists and sample applications. A December 2022 New Hampshire DOT report is particularly relevant. This report examines peer agency practices for bus stop permitting, and identifies key takeaways and challenges associated with developing a new permitting protocol. A resource guide, developed collaboratively by Pennsylvania DOT and Pennsylvania Public Transportation Association, provides “a common set of tools and resources for municipalities, transit agencies, local planning and engineering staff, and the development community to use in planning, designing and constructing new or upgrading existing fixed route bus stops.”

Gaps in Findings

The survey received a robust response from California transit agencies. More than half of the 50 agencies surveyed provided feedback on their experiences with permitting and installing bus stops on Caltrans ROW. However, some responses required follow-up to obtain clarification or additional details.

Outreach to a selected group of respondents that sought information to supplement survey responses has not yet produced results. (These requests now appear with other actions to consider in **Next Steps** below.) Additional attempts to gather information will be made while the project panel reviews the draft report. Any new information received during the course of the panel’s review will be incorporated into the final report.

Finally, while a review of literature identified relatively little on best practices for permitting, the case studies included in recent research illustrating other states’ practices may prove helpful. The final report (still pending) produced for the TCRP synthesis project in process that is focused on bus stops placed in rural and exurban communities may also inform Caltrans' examination of current permitting practices.

Next Steps

Moving forward, Caltrans could consider:

- Contacting selected agencies to learn more about recommended practice changes:
  - Expedite application rejection by encouraging prompt notification of rejection for missing documents or other reasons (*City of Eureka* and *Humboldt Transit Authority*).
  - Reconsider requirements for the level of review (*City of Wasco*) and engineered drawings (*Humboldt Transit Authority* and *Redwood Coast Transit Authority*).
    - When reaching out to the Redwood Coast Transit Authority, investigate the support provided by Crescent City, including its processing of bus stop upgrades using less-intensive design methods such as Google Maps sketches.
  - Investigate administrative issues to ensure the new Caltrans Encroachment Permit System is generating the appropriate notifications (*Madera County Public Works*) and sufficient staff is available for permit reviews (*Redding Area Bus Authority*).
- Reviewing AVTA's *Bus Stop Guidelines* to assess whether its framework could help other transit agencies wishing to establish guidelines to both aid the transit agency and expedite the permitting process with Caltrans.
- Allowing installation of Simme-Seats, as requested by Redwood Coast Transit Authority, for use in locations where installation of a shelter or other amenities is not appropriate.
- Engaging with the Plumas County Transportation Commission respondent to learn more about the commission's practice to identify a single bus shelter design and create standard installation guidelines.

Detailed Findings

Background

Strategically placed bus stops with amenities are crucial for a successful transit network, as they provide riders access to jobs, education, healthcare and other essential services. A lack of marked bus stops and location-specific bus stop amenities including shelter, seating and signage disproportionately affect riders, especially in rural and small urban areas. Permitting and installing bus stops with appropriate shelter amenities on the California Department of Transportation (Caltrans) right of way (ROW) too often involves complicated permitting procedures that vary from Caltrans district to district, leading to onerous delays and costs that rural and suburban transit agencies cannot afford. The lack of bus stops in rural and suburban California drives down ridership, and is particularly problematic for seniors, people with disabilities and low-income workers who rely on transit.

A range of permitting challenges are under review:

- Delays and risk due to the involvement of multiple functional units (traffic safety, traffic operations, permitting, ROW, etc.).
- Locations where a highway has become a town's main street.
- Need for 30% engineering drawings.
- Lack of standardized shelter designs or streamlined permit processes.
- Need for more than a permit when there are other issues within or adjacent to the traveled way. A simple bus stop permit can become a capital improvement project when ROW, safety or design improvements require Caltrans engineering staff to sign off on the proposed project.

Caltrans is seeking to reform the internal bus stop permitting process across all districts to reduce schedule delay and risk, lower costs and streamline implementation of bus stops on the Caltrans ROW. A streamlined permitting process that incorporates best practices and end user guidance from transit agencies and state transportation agencies across the country is expected to lower costs for rural and semiurban transit agencies.

Below is a presentation of information gathered about these issues. The materials and experience discussed in this investigation were gathered through a survey of selected California transit agencies and a review of in-progress and completed domestic research.

Survey of Practice

An online survey distributed to 50 California transit agencies identified by the project panel sought information about the permitting and installation of bus stops on Caltrans' ROW. Representatives from 31 California transit agencies responded to the survey:

- Antelope Valley Transit Authority
- Arvin Transit
- Auburn Transit
- City of Chowchilla[1]
- City of Corcoran/Corcoran Area Transit
- City of Eureka
- Madera County Public Works
- Mariposa County Public Works[3]
- Mendocino Transit Authority
- Morongo Basin Transit Authority (Basin Transit)
- Mountain Area Regional Transit Authority
- Needles Area Transit[4]

- City of Ojai Trolley
- City of Porterville[2]
- City of Shafter
- City of Wasco
- Colusa County Transit Agency
- Glenn Transit Service
- Humboldt Transit Authority
- Kern Transit
- Lake Transit Authority
- Lassen Transit Service Agency
- Nevada County
- Plumas County Transportation Commission
- Redding Area Bus Authority
- Redwood Coast Transit Authority
- Sacramento County[5]
- Santa Ynez Valley Transit
- Siskiyou County
- Tulare County Regional Transit Agency
- Yurok Tribe

Five transit agencies responded in some form to the survey but indicated that their agencies had not installed bus stops on Caltrans' ROW. As such, there are no survey responses for these agencies summarized in this report.

1 City of Chowchilla has no bus stops in the Caltrans ROW.

2 City of Porterville has no bus stops requiring Caltrans permitting.

3 Mariposa County Public Works operates a dial-a-ride service. Mariposa County, a rural, mountainous area, does not maintain bus stops.

4 Needles Area Transit has no bus stops that would have required Caltrans permitting nor are there any current plans to install bus stops within Caltrans ROW.

5 Sacramento County does not currently have any facilities or plans to move forward with bus stops within Caltrans ROW.

The survey's 31 respondents represent a 62% response rate.

Note: As indicated in the footnoted list of survey respondents above, five of the 31 respondents reported that their agencies had not installed bus stops on Caltrans' ROW and could not provide the information the survey was seeking. The remainder of this report presents feedback from the 26 transit agencies with bus stop permitting experience.

Half of the 26 transit agencies completing the survey are served by two Caltrans districts — District 1 and District 6. The remaining respondents' bus stop permits are processed by staff in Caltrans Districts 2, 3, 5, 7 and 8. Table 1 identifies the Caltrans districts overseeing bus stop permitting for the transit agencies completing the survey.

Table 1. Responding Transit Agencies Organized by Caltrans District

Transit Agency	Caltrans District
City of Eureka	1
Humboldt Transit Authority	1
Lake Transit Authority	1
Mendocino Transit Authority	1
Redwood Coast Transit Authority	1
Yurok Tribe	1
Lassen Transit Service Agency	2
Plumas County Transportation Commission	2
Redding Area Bus Authority	2

Transit Agency	Caltrans District
Siskiyou County	2
Auburn Transit	3
Colusa County Transit Agency	3
Glenn Transit Service	3
Nevada County	3
Santa Ynez Valley Transit	5
Arvin Transit	6
City of Corcoran/Corcoran Area Transit	6
City of Shafter	6
City of Wasco	6
Kern Transit	6
Madera County Public Works	6
Tulare County Regional Transit Agency	6
Antelope Valley Transit Authority	7
City of Ojai Trolley	7
Morongo Basin Transit Authority (Basin Transit)	8
Mountain Area Regional Transit Authority	8

Survey questions are provided in Appendix A. Survey findings from the 26 respondents with bus stop permitting experience to report are highlighted below in six topic areas:

- Permit application development and submission.
- Engaging with Caltrans.
- Permit processing challenges.
- Implications of permitting challenges.
- Maintenance agreements.
- Assessing the permitting process.

Not all respondents addressed every survey question.

Permit Application Development and Submission

Respondents were asked to describe the staffing available to create the required permit application plan sets. Seven of the responding agencies have engineers on staff to create plan sets for permit applications; another 10 have funding to engage contracted engineers and have done so. Together, these agencies represent almost two-thirds of the 26 respondents. The nine remaining responding agencies do not retain engineers on staff and lack the funding to engage contracted engineers.

One agency contracting for engineering services noted that the use of contracted engineering significantly increased project expenses to almost two times the original projected budget (*Redding Area Bus Authority*). For agencies with neither engineers on staff nor funding to engage them, success depends on the availability of the agency staff (*Glenn Transit Service*), and limited available budget does not permit the creation of additional plan sets (*Morongo Basin Transit Authority (Basin Transit)*).

Table 2 summarizes survey responses.

Table 2. Staffing to Create Permit Application Plan Sets

Type of Staffing	Transit Agency and Comments
Engineers on staff (7)	• Arvin Transit • City of Corcoran/Corcoran Area Transit • City of Eureka • City of Shafter • City of Wasco • Nevada County • Plumas County Transportation Commission
Funding to engage contracted engineers and have done so (10)	• Antelope Valley Transit Authority • Auburn Transit • Colusa County Transit Agency • Lassen Transit Service Agency • Madera County Public Works • Mountain Area Regional Transit Authority • Redding Area Bus Authority. The use of contracted engineering significantly increased project expenses to almost two times the original projected budget. • Santa Ynez Valley Transit • Siskiyou County • Yurok Tribe
Neither engineers on staff nor funding to engage contracted engineers (9)	• City of Ojai Trolley. The agency is seeking to engage contracted engineers. • Glenn Transit Service. Success depends on the availability of the agency staff. With "leaner" staffing, there is less capacity to provide this assistance in addition to the local agency's regular duties. • Humboldt Transit Authority. Permitting challenges continue to be a barrier. Funding is always a barrier as jurisdictions do not budget for transit infrastructure. • Kern Transit. The transit agency can coordinate with public works engineers on an as-needed basis. • Lake Transit Authority. The permits the respondent submitted to Caltrans did not require plan sets. • Mendocino Transit Authority • Morongo Basin Transit Authority (Basin Transit). The authority retains Charles Abbott & Associates engineers on an hourly basis. Limited available budget does not permit the creation of additional plan sets. • Redwood Coast Transit Authority • Tulare County Regional Transit Agency. Using third parties is "not ideal."

Average permit application processing time varied among respondents, with five reporting a processing time of 30 days or less (*Arvin Transit*, *City of Corcoran/Corcoran Area Transit*, *City of Ojai Trolley, Humboldt Transit Authority* and *Lake Transit Authority*). Almost 80% of the 24 respondents addressing this question reported an average processing time of 31 to 90 days.

Table 3 identifies the average length of time required by Caltrans to complete its review of responding transit agencies' permit applications.

Table 3. Time Required for Caltrans to Complete Permit Application Review

Time Period	Transit Agency
0 to 30 days (5)	• Arvin Transit • City of Corcoran/Corcoran Area Transit • City of Ojai Trolley • Humboldt Transit Authority • Lake Transit Authority
31 to 60 days (8)	• Antelope Valley Transit Authority • Auburn Transit • City of Eureka • Glenn Transit Service • Madera County Public Works • Nevada County • Plumas County Transportation Commission • Siskiyou County
61 to 90 days (7)	• City of Shafter • Colusa County Transit Agency • Lassen Transit Service Agency • Mendocino Transit Authority • Morongo Basin Transit Authority (Basin Transit) • Santa Ynez Valley Transit • Yurok Tribe
91 or more days (4)	• City of Wasco • Mountain Area Regional Transit Authority • Redding Area Bus Authority • Tulare County Regional Transit Agency

Engaging with Caltrans

Transit agencies have opportunities to engage with Caltrans in different ways, with different staff and at different points in the permitting process to receive a range of services. Survey responses are summarized below in four topic areas: consistency in Caltrans staffing; Caltrans staffing differences; district engineering or design assistance; and phased improvements.

Consistency in Caltrans Staffing

Nearly three-quarters of the 26 agencies work with multiple areas of Caltrans (corridor planning, active transportation) on improvement projects and services:

- Auburn Transit
- City of Corcoran/Corcoran Area Transit
- City of Eureka
- City of Ojai Trolley
- City of Shafter
- City of Wasco
- Lake Transit Authority
- Lassen Transit Service Agency
- Madera County Public Works
- Mendocino Transit Authority
- Mountain Area Regional Transit Authority
- Plumas County Transportation Commission
- Redding Area Bus Authority
- Redwood Coast Transit Authority
- Siskiyou County

- Humboldt Transit Authority
- Morongo Basin Transit Authority (Basin Transit)
- Tulare County Regional Transit Agency
- Kern Transit

Five agencies do not work with multiple areas within Caltrans: Antelope Valley Transit Authority, Arvin Transit, Colusa County Transit Agency, Santa Ynez Valley Transit and Yurok Tribe. Two respondents — Glenn Transit Service and Nevada County — were unable to address this question.

The 18 transit agencies below tend to work with the same Caltrans staff members on most projects seeking bus stop permits:

- Arvin Transit
- City of Corcoran/Corcoran Area Transit
- City of Eureka
- City of Shafter
- City of Wasco
- Colusa County Transit Agency
- Kern Transit
- Lake Transit Authority
- Lassen Transit Service Agency
- Mendocino Transit Authority
- Morongo Basin Transit Authority (Basin Transit)
- Mountain Area Regional Transit Authority
- Plumas County Transportation Commission
- Redwood Coast Transit Authority
- Santa Ynez Valley Transit
- Siskiyou County
- Tulare County Regional Transit Agency
- Yurok Tribe

Caltrans Staffing Differences

Transit agencies working with multiple Caltrans staff on bus stop permitting described the differences — and positive aspects — of this engagement:

- Different projects have different project managers (*Auburn Transit*).
- Staffing depends on the project (*City of Ojai Trolley*).
- Even with regular turnover or rotations, communication has been fairly consistent (*Glenn Transit Service)*.
- *From the survey response*: On planning projects, conversations and feedback can vary depending on the personal opinions of Caltrans staff. On projects, level of support from Caltrans staff for transit infrastructure varies between ignored to enthusiastic. Over the last year proactive engagement from Caltrans staff with HTA [Humboldt Transit Authority] has increased significantly (*Humboldt Transit Authority*).
- The agency works mostly with mass transit staff, but engages with encroachment staff on bus stop and shelter installations in the Caltrans ROW (*Madera County Public Works*).
- Transit staff employed by the county typically work in partnership with Nevada County Transportation Commission on corridor planning and active transportation projects (*Nevada County*).
- The Caltrans District 2 team is “top-notch and provide[s] decent guidance” (*Redding Area Bus Authority*).

District Engineering or Design Assistance

Five responding agencies described their experiences receiving, or anticipating, Caltrans district engineering or design help in connection with a permit application:

- *Humboldt Transit Authority*. The respondent identified only one instance of this assistance "in recent memory." Under direction from Caltrans Headquarters, District 1 acted as lead on the National Environmental Policy Act preliminary environmental study for the transit authority's hydrogen fueling infrastructure.
- *Lassen Transit Service Agency*. Caltrans provided unspecified assistance with stops on Ash Street and Highway 139, Highway 36 and Fredonyer Summit, and Highway 395.
- *Nevada County*. Caltrans assisted in design and development of State Route 49 corridor improvements from La Barr Meadows to McKnight Way.
- *Redding Area Bus Authority*. The transit authority was offered continued consultation during an ROW permit submission for approximately 10 stops.
- *Redwood Coast Transit Authority*. District 1 requested from the transit authority a list of bus stops that require only signs. In making this request, the respondent speculated that Caltrans may support this effort by providing the necessary drawings for these sign installations.

Phased Improvements

Two transit agencies requested phased improvements that would allow for the initial installation of minimal improvements and the later addition of shelters. The City of Ojai Trolley received permission to implement phased improvements to address unspecified "challenges along the way; Yurok Tribe installed new boundaries signs as part of phased improvements. Arvin Transit requested but was not given permission to phase improvements. All other responding agencies did not address this question or have not requested phased improvements.

Permit Processing Challenges

The survey offered opportunities for respondents to describe issues related to permit application processing in two topic areas: approval delays and rejected applications.

Approval Delays

Six respondents described delays or difficulties in receiving approval for permit applications, with some offering a recommendation for improving the review and approval process:

Expedite Application Rejection

- It takes a minimum of 30 days to initiate a review. Once an application is reviewed, if another document is needed from the transit agency, the application requires another 30 days for review. If Caltrans is aware a document is missing, the respondent prefers to know as soon as possible rather than waiting 30 days to learn of a rejected application. Wait times for approval can sometimes be months (*City of Eureka*).
- Encroachment permits are denied without discussion if not all materials deemed necessary are included. As the respondent noted:

  > Opinion on what is necessary from checklists differs between [Caltrans] staff. Denial vs. iterative conversation is presumably due to pressure to maintain permit response times. A denial 28 days after permit application meets target response time requirements, while comments issued 28 days after permit application presumably do not meet target response requirements. Denial vs. iterative conversation extends the permitting timeline for the applicant (*Humboldt Transit Authority*).

Reconsider Requirements

- Significant reviews are required by Caltrans, with substantial requirements above and beyond what the city would typically perform for its own ROW (*City of Wasco*).
- The Caltrans requirement for complete civil drawings and structural calculations for a simple shelter replacement or installation of a pole for bus stop signage is unreasonable for small resource-constrained transit agencies (*Humboldt Transit Authority*).
- Historically, Caltrans has refused to accept bus stop applications without engineered drawings. This requirement, when combined with the lack of engineering staff and/or funding to contract for engineering staff to develop drawings, essentially prohibits bus stop development for the authority (*Redwood Coast Transit Authority*).

Investigate Administrative Issues

- The new Caltrans Encroachment Permit System did not appear to notify Caltrans staff when the applicant submitted system updates *Madera County Public Works*).
- The respondent identified staffing and availability for permit submission review as reasons for delays in project review and approval (*Redding Area Bus Authority*).

Rejected Applications

When a bus stop permitting application is rejected, Caltrans may offer a reason for the rejection or engage with the agency to identify a path forward. The survey sought respondents' experiences when permit applications are rejected.

Rather than citing a specific instance of engagement when addressing a rejected application, the City of Eureka respondent instead noted that Caltrans "began talking to its different branches on how to make the application process better for smaller cities and transit authorities." As previously noted, this respondent also recommended that Caltrans identify missing documents as quickly as possible rather than waiting 30 days to issue a rejection.

Two transit agencies reported on rejections associated with Americans with Disabilities Act (ADA) compliance. Respondents from the City of Shafter and Madera County Public Works noted that ADA compliance and sight distance and visibility have been cited as reasons for rejected applications. The City of Shafter respondent additionally cited clear recovery zones and proximity to driveways and intersections.

Other respondents described Caltrans' engagement regarding a rejected application:

- The Caltrans district offered an unspecified alternative (*Madera County Public Works*).
- The respondent commented, "Unfortunately there is often disagreement with the reasons and/or funding is not available to meet the requirements" (*Humboldt Transit Authority)*.
- The Caltrans district team provided guidance on the resubmission of documents, offering clear examples of appropriate revisions (*Redding Area Bus Authority*).
- Assistance is offered via email or phone (*Yurok Tribe)*.

Implications of Permitting Challenges

Inefficiencies or challenges in any process have consequences. Survey respondents described how their transit agencies were impacted by permitting challenges in three topic areas: bus stop placement strategies, stop locations impacted by delays and infeasible projects.

Bus Stop Placement Strategies

A range of strategies can be used to install bus stops where there are no existing sidewalks, transit waiting pads, curbs or paths of travel. Respondents employ alternative treatments, make site improvements, engage with others in the community, install signage and relocate stops. One respondent expressed interest in a treatment for locations lacking a shelter that has not yet been approved for use by Caltrans. Table 4 summarizes survey responses.

Table 4. Strategies to Address Challenging Bus Stop Placement

Strategy	Transit Agency and Description
Alternative Improvements	*Antelope Valley Transit Authority*. Consider alternative improvements with different materials. *City of Corcoran/Corcoran Area Transit*. Review the area and ADA compliance regulations; install cement in the area in a manner consistent with ADA requirements.
Community Engagement	*Antelope Valley Transit Authority*. Coordinate with the respective jurisdiction and plan for improvements for areas where extensive work is needed. *Mountain Area Regional Transit Authority*. Contact private businesses and local municipalities. *Siskiyou County*. Work with impacted cities.
Relocate Stop	*City of Wasco*. Place stops in areas with paths of travel. *Lassen Transit Service Agency*. Move stops to the next safest location.
Signage	*Arvin Transit*. Install signage. *Humboldt Transit Authority.* Install a pole with signage.
Simme-Seat Installation	*Redwood Coast Transit Authority*. The respondent noted that most of the areas the transit authority serves could be described as challenging locations for installation. If allowed by Caltrans, the transit authority would install Simme-Seats on 2-inch Unistrut posts that also support bus stop signs. See Figure 1 and Simme-Seat: The Innovative Seating Solution for more information.
Site Improvements	*Glenn Transit Service*. Consider future needs and development of the area and proceed to make plans to improve the site if needed. *Madera County Public Works*. Build the required access pads, sidewalks or paths of travel at significant expense.
Solar Light Poles	*Redding Area Bus Authority*. Use the edge of highway ROW to locate and install solar light poles to improve visibility and enhance safety at stop locations.
No Strategies **No Installation** **No Good Options**	*Mendocino Transit Authority.* Not installing is the agency's current strategy. *Santa Ynez Valley Transit.* The agency has not established any strategies. *Siskiyou County.* Not installing is the agency's current strategy. *Tulare County Regional Transit Agency.* The respondent noted that there are no good options for this situation.

Figure 1. Image from the Simme-Seat Customer Gallery (Long Beach, California)

(*Source*: Simme LLC.)

Other respondents offered background information on transit agency practices:

- *Auburn Transit* operates a demand response service.
- *City of Ojai Trolley* is creating an internal plan for challenging sites that will be shared with Caltrans.
- *City of Shafter* bus stops currently have existing sidewalks, transit waiting pads, curbs or accessible paths of travel.
- *County of Nevada* requires complete ADA improvements to be made at stops; funding has not been available to undertake these projects.
- *Plumas County Transportation Commission* is working with Caltrans on Capital Preventive Maintenance projects to add bus shelters along the state highway.

Stop Locations Impacted by Delays

Five transit agencies reported that one or more bus stop locations are without stops due to the permitting procedure backlog. The number of stops delayed by the permitting backlog varied widely, from only a handful to more than 100 stops:

- *Antelope Valley Transit Authority* — 103 stops.
- *City of Ojai Trolley* — At least three stops. Funding is also a challenge.
- *Mountain Area Regional Transit Authority* — A “handful” of stops.
- *Redding Area Bus Authority* — Approximately 15 stops.
- *Redwood Coast Transit Authority* — 30 to 40 stops.

Other transit agencies provided additional perspective on locations without stops or upgrading stops:

- While *Glenn Transit Service* currently has no locations without stops, the time required to complete Caltrans’ review and adhering to the necessary requirements have indefinitely delayed proposed changes.

- Nearly all stops maintained by *Humboldt Transit Authority* have at least a pole with a sign; many remote rural stops have no infrastructure other than a pole and sign. Only very recently has the transit authority sought to improve infrastructure on Caltrans ROW in rural areas.

Infeasible Projects

The lack of available funding and the cost associated with meeting permitting and other requirements have made certain projects infeasible for some transit agencies:

- Funding is a challenge, as is working in collaboration with Caltrans (*City of Ojai Trolley*).
- Simple shelter replacement or installation of a new pole with signage requires detailed civil drawings and structural calculations, which can preclude project development (*Humboldt Transit Authority*).
- The agency must factor in the cost of developing a bus stop that meets ADA requirements, which delays securing adequate funding (*Madera County Public Works*).
- Previous bus stop installations have required the purchase of land and installation of the pad, walkways, railings and other site enhancements. The cost for these improvements can be nearly $500,000 for a single stop (*Mountain Area Regional Transit Authority*).
- The respondent noted that the transit agency "can barely afford the hardware (signs, posts, installation labor) to install bus stop signs, let alone drop a couple hundred thousand to overengineer stops with stamped drawings" (*Redwood Coast Transit Authority*).

Maintenance Agreements

Eleven transit agencies include maintenance agreement language in the permit agreement:

- Arvin Transit
- City of Eureka
- City of Shafter
- City of Wasco
- Glenn Transit Service
- Mendocino Transit Authority
- Morongo Basin Transit Authority (Basin Transit)
- Redding Area Bus Authority
- Santa Ynez Valley Transit
- Siskiyou County
- Tulare County Regional Transit Agency

None of the respondents identified how they address vandalism, trash, homelessness and other maintenance-related issues in the permit agreement.

Two transit agencies provided limited information on maintenance-related issues:

- The City of Shafter's permit agreement includes provisions addressing vandalism, trash, homelessness, and other maintenance-related issues to ensure ongoing safety, cleanliness and accessibility of bus stop locations. (The respondent was unable to provide these provisions.)
- Homelessness is a significant issue for the Redding Area Bus Authority to overcome at several locations along its more popular routes. To address it, the authority seeks to expand its coverage equipment for existing routes.

Further details of maintenance responsibilities and practices were not solicited through the survey.

Assessing the Permitting Process

Respondents described their agencies' successes, challenges and best practices when seeking permits for bus stop locations on Caltrans ROW.

Successes

Transit agencies have benefited from collaboration and coordination with a range of partners that include public works and community development directors, property owners, Caltrans district staff and local jurisdictions. Engagement and communication on bus stop design have also been key to successful bus stop permitting and installation.

Table 5 summarizes the successes responding agencies experienced in connection with permitting and installing bus stops.

Table 5. Transit Agency Successes in Bus Stop Permitting

Success Factor	Transit Agency and Description
Collaboration	*City of Corcoran/Corcoran Area Transit.* The respondent reported "good relations" with the transit agency's public works and community development directors. *Glenn Transit Service*. District 3 has been the transit agency's "willing partner" on bus stop projects. *Lassen Transit Service Agency*. The transit agency's permitting experience has been positive, with the respondent noting that the agency works well with its partners in District 2. *Mountain Area Regional Transit Authority*. The transit authority has had success working with local jurisdictions and private businesses. *Redwood Coast Transit Authority*. Crescent City is very supportive of the authority's bus stop improvements. The city provides an annual umbrella permit for routine maintenance of bus stops and quickly processes individual bus stop upgrades using less-intensive design methods such as Google Maps sketches.
Communication	*Humboldt Transit Authority.* Engagement and communication with Caltrans on bus stop design have been good within the last year.
Effective Processes	*City of Shafter.* The city streamlined the permitting and installation of bus stops through effective coordination between city departments and property owners. This has resulted in timely installation, consistent compliance with accessibility requirements, and the placement of bus stops in locations that are safe, accessible and responsive to community needs.

Respondents also described successful bus stop installations:

- *Humboldt Transit Authority* cited installation of new bus stop infrastructure requested by Caltrans as part of Caltrans' internal highway improvement programs.
- *Lassen Transit Service Agency* highlighted the new bus shelter at Highway 36 and Gay Street and new bus stop at Highway 36 and Laurel Street.
- *Mendocino Transit Authority's* West Road project with District 1 is "a spectacular success."
- *Plumas County Transportation Commission* updated seven existing bus shelters and installed four new bus shelters over the last five years; four new shelters will be installed in 2026.
- *Redding Area Bus Authority* successfully submitted one large multiple layer stop installation list; processing the installation list required six months.

- *Yurok Tribe* installed one bus shelter at Martin's Ferry Bridge.

Challenges

Respondents offered no consensus regarding the most significant challenges their agencies faced when attempting to permit and install bus stops. Table 6 presents the wide range of survey responses.

Table 6. Transit Agency Challenges in Bus Stop Permitting

Challenge Factor	Transit Agency and Description
Collaborating with Partners	*Mountain Area Regional Transit Authority*. Working with San Bernardino County and Caltrans is most challenging.
Complying with ADA Requirements	*Glenn Transit Service*. Required upgrades to sites, including potential crosswalks, engineering requirements and ADA compliance, can be challenging. *Mendocino Transit Authority*. Required ADA improvements have hindered the consideration of new stops. *Plumas County Transportation Commission*. ADA compliance is the commission's most significant challenge. *Santa Ynez Valley Transit*. The transit agency has not attempted to obtain a permit for bus stop-related construction along Highway 246 in the past five years. In the coming year, the agency will complete upgrades at the southeast corner of the Alamo Pintado Road and Mission Drive intersection. While the agency would consider installing sidewalk from the intersection to the shelter, if required to upgrade the ADA ramp at the intersection as part of those improvements, the agency would not complete the project.
Contracting	*Yurok Tribe*. Locating a contractor.
Cost	*Lassen Transit Service Agency.* The cost of bus stop improvements. *Humboldt Transit Authority.* More than $50,000 in engineering costs to design and apply for permits for 21 poles with bus stop signage (12 are in Caltrans' ROW) is "too much."
Infrastructure	*City of Shafter*. ROW limitations. *Siskiyou County*. Lack of sidewalks.
Installation	*City of Shafter*. Ensuring accessibility and safety compliance during installation.
Limited Resources	*Antelope Valley Transit Authority*. The transit agency lacks the staff and equipment to install bus stops. *Redwood Coast Transit Authority*. The transit authority lacks engineers to prepare the necessary CAD drawings and the funding needed to contract for engineers to complete them.
Obtaining Approvals	*City of Eureka.* Long wait times. *Humboldt Transit Authority.* For 14 months, the city of Eureka has attempted to obtain an encroachment permit for replacing existing transit shelters; a permit has yet to be issued. The transit authority is in the process of initiating projects along Caltrans ROW. With no significant infrastructure projects with Caltrans over the last 10 years, it is too early to provide more detailed feedback. *Redding Area Bus Authority*. Obtaining Caltrans' approval based on installation reviews that require the involvement of three departments.

Challenge Factor	Transit Agency and Description
Permitting Process	*City of Wasco*. Every step of the permitting process is challenging. The city does not attempt to place bus stops in Caltrans ROW because of the "difficult permit process."
Property Owner Engagement	*City of Corcoran/Corcoran Area Transit.* Working with property owners regarding ROW. *City of Shafter*. Coordinating with property owners.
Time	*Lassen Transit Service Agency*. The time required for engineering.

Best Practices

Common themes identified in the best practices shared by respondents for permitting and installing bus stops include collaborating and communicating, ensuring appropriate expertise and remaining flexible. Table 7 summarizes survey responses.

Table 7. Best Practices for Bus Stop Permitting

Best Practice	Transit Agency and Description
Collaborate and Coordinate	*City of Shafter*. Ensure early coordination and advance verification of ROW and accessibility requirements, and prioritize safe, ADA-compliant bus stop locations. *Siskiyou County*. Work with the cities in your jurisdiction.
Communicate	*Mendocino Transit Authority*. Communicate with the district.
Ensure Expertise	*Mountain Area Regional Transit Authority*. Contract with experienced engineers and independent contractors.
Remain Flexible	*Glenn Transit Service*. Be willing to adjust where needed.
Standardize Process Improvements	*Plumas County Transportation Commission*. Choose one bus shelter design and create standard installation guidelines to streamline the permitting and installation process. *Redding Area Bus Authority*. Develop a template packet that meets all submission requirements. Such a packet can inform future submissions and reduce queries from Caltrans staff.

Other Recommendations and Best Practices

Transit agencies offered other recommendations and best practices for improving Caltrans' bus stop permitting and installation process.

***Realign Responsibility* (Antelope Valley Transit Authority)**

To save time and effort in the permitting process, the planning, engineering and installation should be conducted by the jurisdiction (typically, cities) owning the ROW. Due to the lack of funding, staff, equipment and experience with installing bus stops, a transit agency must make the potentially costly decision to hire an engineering firm with the necessary expertise.

***Tighten Up Review and Remain Flexible* (Redding Area Bus Authority)**

Improving the final review and shortening return times will improve the overall permitting process and encourage smaller agencies to prepare more complex submissions. Consider moving away from a one-size-fits-all approach that allows for differing processing for certain types of submissions.

***Trim Requirements for Sign-Only Stops* (Redwood Coast Transit Authority)**

Most rural stops on Caltrans highways do not have sufficient ridership volumes to require seating and/or shelters. If adopted, current discussions of a streamlined process that requires no CAD drawings for sign-only bus stops will have a significant impact for agencies serving rural riders. Such a change will allow transit agencies to focus on providing some type of seating and shelter at the busiest Caltrans ROW locations.

***Bus Stop Guidelines* (Antelope Valley Transit Authority)**

A 2018 inventory of Antelope Valley Transit Authority's approximately 800 bus stops sought to provide the Lancaster Planning Commission with an update on the transit agency's bus stop improvement program. As part of this update, Antelope Valley Transit Authority requested adoption of the *Bus Stop Guidelines* (see citation below), prepared by transit authority staff to aid in the installation of a new bus stop. The guidelines describe program goals, limitations and priorities, and the general state of the transit agency's inventory. The guidance also addresses bus stop design considerations and preferences, and amenities, placement, maintenance and removal. Included in the appendices are an ADA requirements guide and bus stop maintenance schedule.

Related Resource:

Bus Stop Guidelines, Antelope Valley Transit Authority, May 2018.
Provided to Caltrans separately.
From the introduction: This document summarizes the recommended guidelines and policies pertaining to AVTA's [Antelope Valley Transit Authority's] bus stop design, placement, maintenance, removal, amenities and improvement. In developing and implementing these policies, the AVTA works to assure optimum safety and convenience for its ridership while meeting the requirements of regulatory entities at the local, state and federal levels. Assembling these guidelines and policies in a single document also will allow AVTA, local governments and developers to more easily incorporate transit needs into their operations plans and/or design of neighborhoods, streets, roads and commercial development. (Note: All activities and practices discussed herein will conform to customary engineering standards and practices even if not explicitly stated within this document.)

Related Research and Resources

A literature search of recent publicly available resources identified publications that are organized into the following topic areas:

- National Research and Guidance.
- State Research and Guidance.

National Research and Guidance

Research in Progress: Transit Cooperative Research Program (TCRP) Synthesis J-07/Topic SH-25: Building Safe, Quality Access to Bus Stops for Rural and Exurban Communities, Texas A&M Transportation Institute, start date: February 2025; expected completion date: unknown.
Project description at https://apps.trb.org/cmsfeed/TRBNetProjectDisplay.asp?ProjectID=5763
From the project description: This synthesis will cover issues of screening/triggers for identifying rural, tribal, frontier and exurban fixed-route bus stop locations, jurisdictional authority, coordination and funding/maintenance agreements necessary to improve the conditions of these bus stops, as well as: (1) Expand on above and provide a synthesis of current practices or examples of coordination and trigger processes that exist to provide safe and accessible bus stops in suburban or rural contexts. Incorporate relevant information and gaps based on a scan of the sources below. (2) Examine the collective roles and responsibilities that might improve the culture of collaboration, including public involvement, around transit infrastructure needs. (3) Determine how standard coordination and review capacities and procedures are deployed with respect to first and last mile infrastructure needs (such as benches, shade, connection to nearby locations, crosswalks). Review first and last mile screening and trigger mechanisms to identify locations and needs in advance of routine roadway maintenance, driveway permitting, land development review process, and/or other competing transportation needs.

TCRP Synthesis 152: Transit Agency Relationships and Initiatives to Improve Bus Stops and Pedestrian Access: A Synthesis of Transit Practice, Todd Hansen, Kelly Blume, Ipek Sener and Jinuk Hwang, 2021.
Publication available at https://nap.nationalacademies.org/catalog/26166/transit-agency-relationships-and-initiatives-to-improve-bus-stops-and-pedestrian-access
From the objective and scope:

> The objective of this synthesis report is to provide useful information on the state of the practice at transit agencies and other partnering entities to improve bus stops and connecting pedestrian infrastructure. The study aims to showcase the benefits and challenges of improvement programs with respect to interagency relationships, agreements with other entities and communication with private developers. The report illustrates tools and prioritization strategies for identifying target transit stops and corridors for infrastructure improvements, along with the criteria and methodologies for investment decision making. The report focuses on programs and initiatives for the bus stop amenities, immediate connecting pedestrian pathways, and nearby intersections that are integral to accessing transit.

From lessons learned appearing on page 32 of the report, page 41 of the PDF:

> Working with other local agencies during infrastructure improvement projects and coordinating with local road projects can lower the cost of upgrades to bus stops and offer transit agencies a supporting role in the permitting process for local development that affects bus stops.

Toolkit for the Assessment of Bus Stop Accessibility and Safety, Easter Seals Project ACTION and Federal Transit Administration, undated.
https://www.nadtc.org/wp-content/uploads/NADTC-Toolkit-for-the-Assessment-of-Bus-Stop-Accessibility.pdf
See page 74 of the PDF for Appendix D, Case Studies/Examples of Agency Coordination, which includes a discussion of Tri-Met Organizational Support for Bus Stop Management. *From the case study*:

> An agreement between Tri-Met and the city of Portland has simplified the siting and permitting process for bus shelters and amenities to allow for quicker installation. Tri-Met encourages developing intergovernmental agreements and memoranda of understanding with municipal departments as they have improved Tri-Met's ability to provide bus stop accessibility and amenity improvements.

State Research and Guidance

California

SB125 Transit Transformation Task Force Final Report, California State Transportation Agency, undated.
https://calsta.ca.gov/-/media/calsta-media/documents/tttf_-final_report-a11y.pdf
From the executive summary:

> California's transit agencies face challenges driven by falling ridership, declining revenues and rising costs from inflation, infrastructure needs, land use patterns and the transition to zero-emission fleets. Together, these factors threaten transit service reliability and financial stability. Task Force members noted that addressing these challenges requires more than reallocating existing dollars — it could be addressed through increased, flexible, and dedicated revenues and funding, efficiencies in capital and operating spending, and diversified revenue streams such as real estate development, toll revenues and innovative financing tools.
>
> ….
>
> This report is intended as a starting point for future conversations, and not as a menu of ready-made policy or fiscal proposals. Implementation of the recommendations found within this report will require additional development to determine the necessary resources, statutory changes or other programmatic changes that would be needed before they can be implemented. This additional detail is beyond the scope of this report.

Included in this final report is the following strategy that relates, in part, to bus stop permitting (see page 41 of the report, page 45 of the PDF):

> **Strategy 24: Expedite delivery of transit-supportive infrastructure and strategies.**
>
> Recommendations
>
> - 24.A. Allow for exemption or preemption of local permitting requirements on identified priority transit routes.
> - 24.B. Establish a by-right permitting mechanism for transit infrastructure – bus shelters, transit priority, TSP [transit signal priority], etc. inside each city and on the State right of way.
> - 24.C. Establish a Statewide TIGER [Transportation Investment Generating Economic Recovery] team to assist with the implementation of BRT [bus rapid transit] and Bus Only lanes Statewide to assist with planning, engineering and implementation in all jurisdictions.
> - 24.D. Establish a streamlined process for adding stops and stations, and a process that involves members of the transit riding community before a stop or station can be removed.

Related Resources:

> **Appendix A: Detailed Analysis Requested Under SB125 1.E**, SB125 Transit Transformation Task Force Final Report, California State Transportation Agency, undated.
> https://calsta.ca.gov/-/media/calsta-media/documents/appendix_a_a11y.pdf
>
> **Appendix B: Table of All Strategies and Recommendations Under SB125 (1)(f) as Approved By the Task Force**, SB 125 Transit Transformation Task Force Final Report, California State Transportation Agency, undated.
> https://calsta.ca.gov/-/media/calsta-media/documents/appendix_b-a11y.pdf

Georgia

Policy 6755-10: Procedures for Permitting Bus Shelters on Rights-of-Way of Public Roads, Office of Traffic Operations, Georgia Department of Transportation, last reviewed December 2023.
https://mydocs.dot.ga.gov/info/gdotpubs/PolicyandProcedures/bf9ff6e4-ee22-5bb6-9227-db291389c354.pdf
This publication provides building plans and general specifications for shelter design. *From the policy document*:

> Code Section 32-6-51 of the Official Code of Georgia, relating to the prohibition and regulation of signs, signals, devices or structures on the rights-of-way of public roads was amended to authorize the erection and maintenance of bus shelters on rights-of-way of public roads and to authorize commercial advertisements on such. This amended code section gives specific guidelines to be followed by those wishing to place bus shelters on the rights-of-way of public roads. The purpose of these instructions is to formulate guidelines and procedures to be followed when administering this code section and the specified requirements for permit approval.

Michigan

Bus Stop Design Standards Manual, Suburban Mobility Authority for Regional Transportation (SMART), January 2025.
https://www.smartbus.org/Portals/0/SMART_Design%20Standards%20Manual.pdf
From Chapter 3, Agency Coordination Requirements:

> Inter-agency coordination should be involved at the start of the bus stop planning and design process. It is important to maintain communication with all parties which will help facilitate a fluent process going forward through design of the bus stop. Planning and installing new bus stops within a cross-jurisdictional service area like SMART's involves understanding both who to contact, when to contact and what to ask. This section will discuss roles and responsibilities related to the inter-agency coordination necessary to bus stop design implemented by a regional transit provider like SMART.

New Hampshire

Transit Facilities in New Hampshire DOT Rights-of-Way: Final Report, Cambridge Systematics, Inc., New Hampshire Department of Transportation, December 2022.
https://mm.nh.gov/files/uploads/dot/remote-docs/nhdot-research-42372k-2022-report.pdf
From the abstract:

> Public transit providers in New Hampshire have bus stops, transit amenities and way finding signage within public highway rights-of-way (ROWs), including state-maintained ROWs. The New Hampshire Department of Transportation (NHDOT) lacked a clear policy or process by which a transit provider

seeks and gains approval to implement these facilities and amenities. NHDOT recognized the need to formalize this process to create a more consistent, transparent and effective process. This report documents a literature review and interviews with NHDOT staff, transit agencies and peer Departments of Transportation (DOT) to summarize current practices in New Hampshire and peer states involving transit stop approval. The research outputs include a form that can be used to request transit stop installation or improvements and a process flow establishing responsibilities for reviewing and approving the request.

Peer agency practices are described for DOTs in Vermont, Maine, Maryland, Florida and New Jersey. The report also considers examples of bus stop siting approval processes in Maryland, New York City, Portland, Oregon, Pennsylvania, and North Carolina.

From the report's key takeaways (see page 20 of the PDF):

NHDOT will need to find a balance between thorough and speedy processes. There is a tension between the thoroughness of a process and the speed at which it can be completed. Transit providers are interested in designing a process that allows them to respond to customers' needs in a timely manner. Table 1.4 provides post-interview survey data on appropriate turnaround times. While a plurality of respondents felt one to two months was an appropriate timeline for a new process, all transit providers marked that one to two weeks or two to four weeks were most appropriate. This indicates a need to spend more time establishing agreement on basic turnaround times that is acceptable for all parties involved.

From the report's key challenges (see page 42 of the PDF):

Designing a process for different stop types. Participants agreed that application and review requirements should be different for a simple new bus sign on an existing route indicating a stop versus designing a bus pull-off with a sidewalk and bus shelter. In the first example, transit agencies feel they are not requesting anything from NHDOT but permission, and should thus be subject to a simplified review process. Participants agreed that any process and application designed should account for the differing levels of complexity and evaluation rigor required for different stop types.

Establishing "thresholds" for different stop types. Participants discussed how NHDOT and transit agencies might determine the appropriateness of a simple sign as a bus stop versus a pull-off or additional infrastructure. Initial qualities raised included roadway speed, ridership, distance to subsequent stops, and maintenance expectations. Overall, transit agencies need to know what NHDOT considers acceptable in specific contexts so that they can comply with expectations.

Other items of interest include a fillable form to request a transit stop or improvement and the framework of a policy statement regarding transit stops in the state:

- Appendix G. Draft Transit Stop Request Form Transit Stop Installation or Improvement Request Form (see page 67 of the PDF).
- Appendix H. Draft Policy Statement (see page 71 of the PDF).

New York

Bus Stop Planning, Design and Placement Guidelines for Westchester County Municipalities, Ilana Wagner, Westchester County Department of Public Works and Transportation, May 2018.
https://transportation.westchestergov.com/images/stories/pdfs/busstopdesignguidelines.pdf
From the abstract: The Westchester County Department of Public Works and Transportation administers the operations of the Bee-Line Bus System, largely within Westchester County. The County contains six cities, 16 towns and 23 villages, each with its own home rule powers over local land use, zoning and other development issues. Within this milieu of local jurisdictions, the planning issues and operational details associated with bus stops need to be publicized in order to facilitate safe and efficient bus operations.

These guidelines have been written to serve as a basic planning tool for municipal staff, governmental agencies and consultants engaged in site design and review activities. Through the distribution of this report, it is anticipated that operational concerns regarding bus stops will be addressed in the field in order to accommodate Bee-Line Bus Service in a timely manner and to the greatest extent possible.

Pennsylvania

Building Better Bus Stops Resource Guide, Pennsylvania Public Transportation Association and Pennsylvania Department of Transportation, December 2020.
https://www.pa.gov/content/dam/copapwp-pagov/en/penndot/documents/programs-and-doing-business/transit/resources-information/capital-guidelines/betterbusstops_complete_resource_guide_web.pdf
From the purpose: The purpose of this guide is to provide a common set of tools and resources for municipalities, transit agencies, local planning and engineering staff, and the development community to use in planning, designing and constructing new or upgrading existing fixed route bus stops.

Related Resource:

> **Quick Reference: Building Better Bus Stops Resource Guide,** Pennsylvania Public Transportation Association and Pennsylvania Department of Transportation, undated.
> https://ppta.net/wp-content/uploads/2024/10/2021-08-13_Bus_Stop_Quick_Reference.pdf
> This 10-page publication provides highlights of the full resources guide cited above.

Virginia

Land Use Permit Application for Small Transit Shelter, Virginia Department of Transportation, October 29, 2024.
https://www.vdot.virginia.gov/media/vdotvirginiagov/doing-business/technical-guidance-and-support/land-use-and-development/land-use-permits/lup-sts_acc.pdf
This document provides detailed information on the steps associated with submitting a land use application for a small transit shelter. *From page 3 of the document*:

> The issuance of a VDOT [Virginia DOT] land use permit authorizing the installation of a transit shelter is contingent upon evaluation of an engineering analysis provided by the applicant and approval by the district administrator's designee. The district administrator’s designee receiving the request shall coordinate review and approval of the request with all appropriate VDOT personnel.
>
> Permit applications must be accompanied by documentation indicating the issuance of all required approvals and permissions from the locality where the activity is to occur and any other state or a federal agency having jurisdictional authority.

The forms below will be required to be submitted as part of the application request for a LUP-STS:

1) Signed Land Use Permit Application for Small Transit-Shelter (LUP-STS)
2) Plans approved by VDOT
3) Commonwealth of Virginia Art and Architectural Review Board approval (*see below)
4) Optional surety forms a) Irrevocable Letter of Credit- LUP-LC b) Surety Bond- LUP-SB

*The permit applicant submits the proposed shelter model to the Commonwealth of Virginia Art and Architectural Review Board (AARB) for their approval. The AARB is an advisory board appointed by the Governor to review the design or modifications of buildings on State-owned property. The AARB recommends approval or disapproval to the Director of General Services (typically via consent agenda), to whom the Governor has delegated this authority. AARB approval is specific to the shelter model; the permit applicant may submit as part of this application, AARB approval for a similar shelter used on a different project (or from another locality), as long as the shelter is the same model.

"Bureaucracy Blocks Virginia Localities from Building Better Bus Stops," Wyatt Gordon, *Virginia Mercury*, April 4, 2023.
https://virginiamercury.com/2023/04/04/bureaucracy-blocks-virginia-localities-from-building-better-bus-stops/
This online article provides examples of bureaucratic issues associated with building bus shelters in state ROW and highlights a possible path to accelerate deployment of bus stops:

> If VDOT and DGS [Department of General Services] can agree on a set of standard shelter choices, then statewide procurement processes could offer a selection of pre-approved shelters that DRPT [Department of Rail and Public Transportation] might have under contract or purchase on behalf of transit providers to further accelerate deployment.

Washington

Transit Stop Permit Policy and Procedure, Washington State Department of Transportation, undated.
https://www.wsdot.wa.gov/publications/fulltext/design/DevelopmentServices/DevelopmentServices-TransitStopPermitPolicyandProcedure.pdf
This document provides the policy and procedure associated with Washington State DOT's (WSDOT's) permitting for transit stops and bus shelters.

Related Resource:

Section 7.9, Traffic Vehicles Stop Zones, Chapter 7, Specialized Highway Uses, WSDOT Traffic Manual, Washington State Department of Transportation, May 2025.
https://wsdot.wa.gov/publications/manuals/fulltext/m51-02/chapter7.pdf
From page 12 of the PDF:

> Region Traffic Offices receive and review requests from transit agencies for approval of transit stops on state highways. WSDOT has a commitment to making transit stop locations more viable and user friendly as well as safe. See the Design Manual Chapter 1730 for information about incorporating transit vehicle stops into the project design process.
>
> When Transit Agencies request a transit vehicle stop zone outside of any incorporated city or town, the public transit agency shall be responsible for conducting a field review to evaluate accessibility to the proposed location. When the requested location is within the roadway, the

transit agency shall have a policy for in-lane stops that addresses safety and operational issues. (WAC 468-46-010).

Transit agencies will complete the Transit Stop Application, and submit it to the Region Development Services Office or Region Planning Office, once submitted, the application will be forwarded to the Regional Traffic Office, where they will conduct a field review and verify sight distance. Once WSDOT receives the application from the public transit authority, WSDOT shall assess the sight distance for the proposed stopped (WAC 468-46-040). The investigation may include shoulder width, accessibility, roadway crossing opportunities, lighting, and possible room for shelters, see Transit Vehicle Stop Checklist (Figure 7-11). The Americans with Disabilities Act guarantees access to public facilities (i.e., transit) for all persons; therefore, the review process must consider the needs of all transit users at each stage of transit use, including both before and after using the transit service.

Once the review has been completed, the stop location is either approved or denied. The Region Development Services or Region Planning Office will administer and approve the Transit Stop Permit (DOT Form 510-017 – Figure 7-10). If a location is denied, a letter stating the reasons is issued by the region.

For incorporated cities and towns, the transit agency requesting the stop shall coordinate with the city/town for requirements.

See also:

- Figure 7-10, Application For Transit Stop Permit (WSDOT Form 510-017), on page 36 of the PDF.
- Figure 7-11, Transit Vehicle Stop Zone Review Checklist, on page 37 of the PDF.

Contacts

CTC engaged with the individuals below to gather information for this investigation.

California Transit Agencies

Geraldina Romo
Planning Manager
Antelope Valley Transit Authority
661-729-2278, gromo@avta.com

Hesham Elshazly
Director
Arvin Transit
805-296-8015, heshame@arvin.org

Greg Bowen
Transit Manager
Auburn Transit
530-820-3182, gbowen@auburn.ca.gov

Robin Roman
Transit Supervisor
City of Chowchilla
559-706-4027, rroman@cityofchowchilla.org

Valerie Bega
Transit and Grants Manager
City of Corcoran/Corcoran Area Transit
559-992-2151,
valerie.bega@cityofcorcoran.ca.gov

Savanah Andrews
Engineering Technician
City of Eureka
707-441-4298, sandrews@eurekaca.gov

Norma Cervantes
Assistant to the City Manager
City of Ojai Trolley
805-646-5581, ext. 107,
norma.cervante@ojai.ca.gov

Russell Isom
Transportation Director
City of Porterville
559-782-7597, risom@ci.porterville.ca.us

Luz Nieto
Transit Supervisor
City of Shafter
661-746-5058, lnieto@shafter.com

Kameron Arnold
City Engineer
City of Wasco
661-758-7204, Kaarnold@cityofwasco.org

Ron Rogers
Transit Manager
Colusa County Transit Agency
530-458-0287, rrogers@countyofcolusa.com

Mardy Thomas
Executive Director
Glenn Transit Service
530-934-6540, mthomas@countyofglenn.net

Jerome Qiriazi
Transit Planner
Humboldt Transit Authority
707-443-0826, ext. 112, jerome@hta.org

Angela Willis
Public Works Manager
Kern Transit
661-862-8890, willisa@kerncounty.com

James Sookne,
Program Manager
Lake Transit Authority
707-263-7868, jsookne@dbcteam.net

Caleb Schortz
General Manager
Lassen Transit Service Agency
530-252-7433, cjs@paratransit.net

Monty Cox
Transit Program Manager
Madera County Public Works
559-675-7811, Monty.cox@maderacounty.com

Jeannie Morvay-Clayton
Account Technician II
Mariposa County Public Works
209-966-5356, jclayton@mariposacounty.gov

Jacob King
Executive Director
Mendocino Transit Authority
707-234-6444, jacob@mendocinotransit.org

Cheri Holsclaw
General Manager
Morongo Basin Transit Authority (Basin Transit)
760-366-2986, cheri@basin-transit.com

Sean Gillingham
Finance Manager
Mountain Area Regional Transit Authority
909-963-7212,
sgillingham@mountaintransit.org

Cheryl Sallis
Community Services Manager
Needles Area Transit
760-326-2113, ext. 115,
csallis@cityofneedles.com

Robin Van Valkenburgh
Transit Services Manager
Nevada County
530-470-2833,
robin.vanvalkenburgh@nevadacountyca.gov

Rob Thorman
Executive Director
Plumas County Transportation Commission
530-283-6495,
robthorman@countyofplumas.com

Brody Wilbourn
Operations Program Manager
Redding Area Bus Authority
530-245-7077, bwilbourn@rabaride.com

Joseph Rye
Executive Director
Redwood Coast Transit Authority
707-235-3078,
executivedirector@redwoodcoasttransit.org

Benjamin Rady
Associate Planner, Planning and Programs Division
Sacramento County Department of Transportation
916-874-4479, RadyB@saccounty.gov

Bridget Paris
Public Works Director
Santa Ynez Valley Transit
805-465-7794, bridgetp@cityofsolvang.com

Angie Stumbaugh
Transportation Services Manager
Siskiyou County
530-842-8297, astumbaugh@co.siskiyou.ca.us

Derek Winning
Executive Director
Tulare County Regional Transit Agency
559-355-5281, DWinning@tularecag.ca.gov

Patricia Ulmer-Gensaw
Transportation Manager
Yurok Tribe
707-482-1350, Pulmer@yuroktribe.nsn.us

Appendix A: Survey Questions

The online survey represented below was distributed via email to 50 California transit agencies identified by the project panel.

Streamlining Bus Stop Permitting and Installation on Caltrans' Right of Way
The California Department of Transportation (Caltrans) is exploring California transit agency processes for seeking permits for and installing bus stops within Caltrans' right of way that serve rural and semiurban customers.

The survey below examines your agency's experience with permit application development and submission, engagement with Caltrans regarding the permitting process, program administration, and assessment. We estimate the survey will take 15 minutes to complete. We would appreciate receiving your responses by **Friday, December 19**.

If someone else in your agency would be more appropriate to address questions related to this issue, please forward this survey to that person.

The final report for this project, which will include a summary of the responses received from all survey participants, will be available on the Caltrans website.

If you have questions about completing the survey, please contact Chris Kline at chris.kline@ctcandassociates.com. If you have questions about Caltrans' interest in this issue, please contact Tori Kanzler at tori.kanzler@dot.ca.gov.

Thank you for your participation.

(Required) Please provide your contact information.

Name:
Title:
Transit Agency:
Email Address:
Phone Number:

Permit Application Development and Submission

1. Does your transit agency have engineers on staff or the funding to engage contracted engineers to create plan sets?
    - Yes, we have engineers on staff.
    - Yes, we have funding to engage contracted engineers and have done so.
    - No, we have neither engineers on staff nor funding to engage contracted engineers.
2. If you do not have engineers on staff or have not contracted with an engineering firm, has your transit agency explored alternative solutions such as interagency coordination with the city or county to submit successful applications to Caltrans?
    - Not applicable
    - No
    - Yes (Please describe your experience using the alternative solution.)

3. In your experience submitting applications, what is the average length of time for a permit review?
    - 0 to 30 days
    - 31 to 60 days
    - 61 to 90 days
    - 91 or more days

Engagement with Caltrans

1. Has your transit agency worked with multiple areas of Caltrans (corridor planning, active transportation) on improvement projects and services?
    - Yes, we have worked with multiple areas of Caltrans.
    - No, we have not worked with multiple areas of Caltrans.
    - I don’t know.
2. Does your transit agency work with the same staff on most Caltrans projects?
    - Yes
    - No (Please describe any differences you’ve experienced in the level and quality of communication across different Caltrans staff members.)
3. Has the local Caltrans district offered your transit agency engineering or design help with an application?
    - No
    - Yes (Please describe the scope of the district’s help and identify the project(s) on which it was offered.)
4. Does Caltrans allow the addition of improvements in phases, such as installing the minimal improvements first (pole, signage, etc.) and then adding the shelters later?
    - We have not requested phased improvements.
    - No, we were not permitted to phase improvements.
    - Yes, we were permitted to phase improvements. (Please provide an example of a phased installation.)
5. Has your transit agency experienced delays or difficulties in receiving approval for projects?
    - No
    - Yes (Please identify the reason(s) cited for the delays or difficulties.)
6. When rejecting an application, does Caltrans offer the reason(s) for the rejection? Reasons for rejection might include Americans with Disabilities Act (ADA) compliance, sight distance and visibility, clear recovery zones, or proximity to driveways/intersections.
    - Not applicable
    - No
    - Yes (Please identify the reason(s) for rejection.)
7. When an application is rejected, has Caltrans offered to work with your transit agency to identify a path forward?
    - Not applicable
    - No
    - Yes (Please describe how Caltrans has engaged with your agency regarding a rejected application.)

Program Administration

1. What strategies has your transit agency developed to provide bus stops where there are no existing sidewalks, transit waiting pads, curbs or paths of travel?
2. How many bus stop locations in your jurisdiction do not have stops due to the permitting procedure backlog?
3. Does the cost of permitting make certain projects infeasible?
    - Not sure
    - No
    - Yes (Please describe the permitting costs and the types of projects that are infeasible.)
4. Does the permit agreement clearly articulate a maintenance agreement?
    - No
    - Yes
5. Are issues such as vandalism, trash, homelessness and other maintenance-related issues addressed in the permit agreement?
    - No
    - Yes (Please provide sample language.)

Assessment

1. What successes has your transit agency observed in connection with permitting and installing bus stops?
2. What are the most significant challenges your transit agency has experienced when attempting to permit and install bus stops?
3. Please share any best practices or lessons learned that your transit agency has identified when permitting and installing bus stops.
4. Please provide links to documents associated with your transit agency's bus stop permitting and installation practices. Send any files not available online to chris.kline@ctcandassociates.com.

Wrap-Up

Please use this space to provide any comments or additional information about your previous responses.