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Chairman Brown, Ranking Member Toomey, and Members of the Committee on Banking, Housing, and Urban Affairs, thank you for the opportunity to testify. My testimony will focus on transit crime, the decriminalization of fare evasion, broken windows theory, and the public safety effects of fare-free transit.

My name is Dorothy Moses Schulz. I am a retired Metro-North Railroad police captain; one of my assignments was commanding officer at New York City's landmark Grand Central Terminal. I am also a professor emerita of law and police science at John Jay College of Criminal Justice (CUNY). I have been a security consultant for U.S. transit agencies and have conducted safety and security audits on behalf of the Federal Transit Administration (FTA). I am currently an adjunct fellow at the Manhattan Institute.

Transit security is complicated. While transit agencies receive federal dollars, their budgets and priorities are set by the cities, counties, or regional boards, or a combination of these, that direct their activities.

Because of these bi- or trifurcated arrangements, policies on security depend on direction from the boards, which are generally comprised of political and civic leaders, rather than transit or law enforcement professionals. That includes decisions about replacing transit police with social service workers, how or whether to eject unhoused individuals and drug users and sellers from their facilities, and how or even whether to enforce against fare evasion.

Just as there is no one way to fund transit, there is no one way to police it. Most large systems, including New York's commuter rail lines, New Jersey Transit (NJT), Boston's MBTA, Philadelphia's SEPTA, San Francisco's BART, Washington, DC,'s WMATA, Dallas's DART, Houston's METRO, and Atlanta's MARTA, have their own police forces.

But others, including York City's subway lines, San Francisco MUNI, and Los Angeles Metro, rely for security on a combination of in-house officers, private security, and local police or sheriffs' departments. This is especially true for the light rail systems that have been developed in the last few decades.

Transit policing has been affected by "defund the police" demands. Nearly 1,000 NYPD officers assigned to help remove homeless riders were taken from transit and the NYPD's 85-member homeless-outreach unit was disbanded.[1] Luckily, New York City's new Mayor Eric Adams, a retired police captain whose career began in the NYPD's transit bureau, has announced a Subway Safety Plan[2] that reverses many of these changes.

Other cities, including Denver, Los Angeles, Minneapolis, Seattle, and Portland, Ore.,[3] also cut back on policing transit, often in favor of homeless outreach and mental health workers, and by civilian ambassadors who, rather than issue fare evasion summons, explain to fare-beaters how to pay their fares.

Many politicians cheered the changes. In New York and elsewhere, progressive prosecutors have declined to prosecute trespassers, fare evaders, and those arrested or issued summonses for public order offenses, including drinking, urinating, or injecting drugs in public space. Recently

transit systems have reported riders smoking fentanyl in restrooms and on buses and trains, raising security and health concerns for other riders and particularly for employees.[4]

It is not coincidental that these cities face surging numbers of homeless individuals and drug users and sellers who congregate in stations and on trains and buses. Problems have been exacerbated by COVID-19-related shutdowns, as some systems report ridership losses of 70 percent or more and a sluggish return of commuters. Among them were New York's bus, subway and commuter rail lines; Boston's MBTA; Chicago's CTA and Metra commuter line; Washington, DC, WMATA; and in California, the San Diego Trolley, Los Angeles Metro, and San Francisco Muni.[5]

As a result, stations have become de facto homeless shelters and drug injection sites.

A study of homelessness in transit agencies found that almost 90 percent of the 115 of the primarily U.S., but also Canadian, agencies responding reported complaints about homeless riders from other riders, especially concerning hygiene and aggressive behavior. The majority believe these riders have a negative effect on ridership, that has increased during the pandemic.[6] It is unclear, though, whether there is an actual increase in homeless riders or whether their presence has become more noticeable in the absence of other riders.

Neither destination-less riders nor people using transit facilities for non-travel purposes are new, but passively allowing them to remain is. Throughout their history, railroads hired officers to prevent harassment of and thefts from patrons, to deter human traffickers hunting for vulnerable strangers, and to protect employees and company property.[7]

These capable guardians today are part of the theory of "broken windows,"[8] which stresses the importance of curtailing little offenses before they become big offenses, whether on the street, in a mall, an ATM vestibule, or a transit facility. Broken windows policing has been incorrectly described as the opposite of community policing; one as tough, the other as soft. This is a false dichotomy. Assuring a community' viability isn't tough or soft; it is maintaining order to keep people safe and secure. Today, the decline in order maintenance threatens patrons and employees.[9]

Yet a recent Transit Cooperative Research Program (TCRP) report on analysis, causes, and responses to ridership declines that includes the chapter "Possible Causes of Ridership Decline Identified in the Literature" contains the word "security" only in a chart. Nowhere are crime, fear, homelessness, or drug use/sales mentioned as affecting patrons' willingness to return to transit.[10]

Another TCRP study on fare enforcement provides a different picture.[11] It documents agencies' use of criminal, civil, or administrative penalties to address non-payment while complying with the concerns of the many departments in a transit agency that have a say in fare policies. I served on the topic panel, and I recommend it to you to learn what agencies in your state are doing.

Rather than duplicate the report, I have chosen to highlight two cities as representative of many transit systems. If you talk to agencies in your states, you are likely to hear variations of these examples.

Denver

Prior to COVID-19, Denver's Regional Transportation District (RTD) had successfully transformed Union Station from a deserted landmark into a hub of tourist and commuter activity. But beginning in 2020, the RTD diverted funds from security to hire mental health workers, and due to COVID-restrictions, tourists and commuters disappeared. Today the station is reeling from what Denver's Mayor Michael Hancock euphemistically called "unwelcome activities." Denver police have made many more arrests than in past years, including more than 500 in less than three months this year, including almost 50 in a single day.[12]

Denver's police chief described the arrestees as homeless, addicted to substances, and facing mental health challenges. A change in penalties for drug possession, he said, contributed to "defelonization, decriminalization [that] makes it very difficult to hold people accountable."

RTD, which has received about $300 million in American Rescue Plan Act (ARPA) funds, decided even before the arrest blitz to close station restrooms and is now consider requiring tickets for access to the station to minimize illegal activity.[13]

But it is facing push-back. The director of the Harm Reduction Action Center criticized the police and the RTD, although conceding that Union Station had become a popular injection site primarily after the library, previously the largest injection site, locked its bathrooms to curtail drug activity.[14] The Center, according to its website, promotes public health by ensuring those who inject drugs are educated and equipped with tools to reduce the spread of communicable disease and to eliminate the proliferation of fatal overdoses. It provides its program participants access to syringe between 9 a.m. and noon.[15]

While there is increasing advocacy around the country for safe injection sites, I believe that most people would agree this is not an appropriate role for either a library or a public transit facility.

Seattle

Sound Transit, which operates in Seattle and Tacoma, is, like Denver and many light rail systems, barrier free. This means there are no turnstiles limiting entry or exiting. Patrons may be asked while on board to show tickets or farecards indicating they have paid for their ride.

Sound Transit in Seattle suffers from the city's crime wave and from budget cuts to the Police Department that have resulted in about 300 vacancies in the 1,000-member department. Transit bus and rail riders have asked for additional police since at least 2019. Recently there have been persistent complaints of drug use on buses and trains, including assaults on drivers by passengers high on drugs.[16]

Seattle police this month arrested a suspect for pushing a 62-year-old woman down a flight of stairs at the Chinatown-International District station. The alleged offender is also suspected of stabbing another person at a downtown bus stop.[17]

Sound Transit is facing insolvency despite receiving about $166 million in ARPA funds. Yet its CEO Peter Rogoff, who was FTA administrator, Undersecretary of Transportation under President Obama, and before that, Senate Appropriations Committee staff, including Democratic Staff Director of the Transportation Subcommittee, when it was led by Sens. Murray and Lautenberg, reported in January, just before retiring, that Sound Transit's losses have created a "financially unsustainable" trajectory, based in part on COVID-19 rider losses but also on an increase in non-paying passengers. "When you've got a situation with a 98 percent chance of being out on the system and not being contacted by anybody..., that just lends itself to further noncompliance. We need to get back to a place where our passengers are honoring the honor system that we're using," he said, estimating that as many as 40 to 70 percent of riders were "nonfare" passengers.[18] Only once (in 2017) has Sound Transit met its goal of farebox receipts covering 40 percent of costs.

Yet Sound Transit replaced fare enforcement officers with ambassadors who provide educational materials to fare evaders rather than issue citations. This occurred following a study that found black riders received a higher percentage of citations than their percentage of riders despite what appeared to be a neutral system of having all passengers tap farecards into a reader to indicate payment.[19]

Legal Challenges to Fare Enforcement

Many systems have cut back on fare enforcement based on similar equity studies, which claim that young, minority males are disproportionately cited for non-payment. Studies in Brooklyn, NY; Minneapolis/St. Paul, Los Angeles, and Cleveland, showed similar disparities.[20] In 2018, the Washington Lawyer's Committee for Civil Rights and Urban Affairs found that 91 percent of all citations or summonses for fare evasion issued by WMATA's Transit Police were to black riders, and that almost half the summons were to black young adults under the age of 25.[21] None of the studies speculate whether the different levels of citations indicate different levels of fare compliance.

But questions about fare enforcement may become moot. The Washington State Supreme Court is expected to decide by the end of the year whether fare enforcement by police officers constitutes a search under the Fourth Amendment. The issue in *State v. Meredith*,[22] is whether by boarding a bus and accepting transportation, the rider consented to a warrantless search following a fare enforcement's officer's request for proof of payment. The rider provided a false name, but based on an on-site fingerprint check, the officer determined the rider's real name and placed him under arrest based on two existing warrants. The case turns on whether the officer's request for proof of payment qualifies as a warrantless seizure.

A similar case, *State of Maryland v. Kennard Carter*, decided on Jan. 29, 2021, successfully challenged fare enforcement in the Baltimore's barrier-free light-rail system.[23] Deciding against the Maryland Transit Administration (MTA), whose police officers participated in routine

sweeps to check for tickets, the court found that sweeps were a warrantless seizure that passengers were unable to reject, making any further actions by the police unlawful.

If the Washington case is decided in the plaintiffs' favor, together with the Maryland case, transit systems are likely to further curtail fare enforcement, effectively making transit free even if fares are not officially eliminated.

Fare-free transit

Just as some may cheer a lessening of fare enforcement, there are also many advocates for fare-free transit.

The most vocal, and thus far the most successful in a large city, has been new Boston Mayor Michelle Wu, who on March 1 made three local bus lines free. The two-year pilot program is funded by $8 million of the $558 million ARPA funds that Boston received. The funding is in addition to the $500,000 in Covid-relief funds that underwrote fare-free transit on one Boston line from August 2021 until the end of the year. Smaller Massachusetts systems have also used ARPA funds to eliminate bus fares.[24]

Wu hasn't indicated a source of funding if the pilot project goes beyond two years but has implied that pandemic funding could continue to be available to fund free transit.[25] A big part of her mayoral campaign was urging the Massachusetts Bay Transportation Authority (MBTA—or the T) to "make the T free." Because the MBTA is a regional authority; no one mayor can make such a decision, but Wu is supported in her larger effort regionwide by Sen. Edward Markey (D), Rep. Ayanna Pressley (D) and by the *Boston Globe*.

Pressley's Freedom to Move Act offers $5 billion in grants to entice transit systems to go fare-free. To qualify, transit agencies would have to improve safety and quality, particularly in low-income and historically underserved communities. Those backing Pressley's bill (and Markey's companion bill) view fare-free transit as part of a larger social-justice agenda, believing that minority males are targeted for enforcement disproportionately and that transit, like schools and libraries, should be free.

Many climate advocates also believe it help to reduce pollution through reduced traffic congestion. Ridership on buses also tends toward women and minorities. For now, the focus is on buses, because they are likely to be controlled by a single city rather than by a regional board.

While a few cities eliminated fares during the COVID crisis and a few are offering free or reduced fares as experiments or to lure back riders, free transit has existed primarily in resort or university towns, where riders were mostly tourists or students.[26]

Despite transit systems facing problems of crime and disorder, discussions on eliminating fares have not considered whether fare enforcement serves a positive function of providing capable guardians who in addition to checking for fares, also serve as representatives of the transit system. The existing studies on fare enforcement ignore that fare enforcement provides an

opportunity to provide patrons with a visible security presence and a sense that someone is in charge of the system. While this security presence may be threatening to some, it is likely to reassure other patrons and enhance their expectations of a safe and secure ride.

Surveys of riders almost universally indicate that their highest priorities are safety, travel time, and service frequency and reliability. Responses favor additional security, particularly among women riders, who, based on income and employment opportunities are often late-night and weekend riders.

Women's sense of vulnerability is not misplaced. Anyone following the news in any city can see that women have more often been victims of crimes in transit systems than male patrons. A recent study in Los Angeles, a system whose former CEO called free transit a "moral obligation,"[27] confirmed studies that women are more likely than men to be concerned about safety on public transit.[28] The report, *Changing Lanes*, noted that Latina, black, or Asian women were more likely than white women to feel unsafe. It also reinforced earlier findings that income plays a large role in transit dependency, specifically that higher-income women can leverage travel resources. They are less dependent on public transit than lower-income women.

While minority groups and riders of limited financial means might see short-term benefits from reduced fare enforcement or from fare free travel, they will be sacrificing protection from the criminals, drug users, and mentally ill persons who are increasingly frequenting transit locations.

Conclusion

I have said little so far about the Infrastructure Investment and Jobs Act (IIJA), also known as the Bipartisan Infrastructure Law, because it addresses neither transit security nor crime on transit property or equipment.

A review of the FTA's IIJA posting[29] makes this clear. The words "security" or "crime" do not appear in any of the 21 factsheets explaining the law. Only assaults on transit workers are mentioned, explaining that these must now be reported to the National Transit Database (NTD), to which agencies have been required since 1974 to report safety-related incidents.

But safety and security, although often used interchangeably, are differentiated in most industries, including public transportation.

Safety – refers to harm from <u>unintentional</u> acts; not fastening bolts properly, or incorrectly installing electrical circuits. Because these acts occur without malice, we call them <u>accidents</u>.

Security – refers to harm from <u>intentional</u> acts, throwing someone down a flight of stairs or taking their property, we call these <u>crimes</u>.

In 2005, the FTA, through a Memo of Understanding (the Annex), transferred its federal security efforts to the Department of Homeland Security (DHS), assigned primarily to its Transportation Security Administration (TSA). While TSA provides some oversight; state safety oversight

agency (SSOA) managers and transit agency police/security personnel at FTA meetings I attended voiced their concerns that TSA's focus on infrastructure hardening to prevent terrorist activities does not address the daily crimes and disruptions to public order discussed here.

FTA grantees, under 49 U.S. Code §5307 (urbanized area formula grants), with some exceptions, must spend 1 percent of their funds on security annually, which many include lighting, surveillance cameras, or emergency phone lines.[30]

But the FTA never directly oversaw transit agencies' security operations. FTA reviewed these indirectly through its three-year audits of SSOAs, primarily assuring that the states were reviewing agencies' security policies and documentation during the states' reviews of agencies within the states. The FTA's Office of Safety and Oversight no longer includes security in either its three-year safety or its expenditure reviews. Some SSOAs continue to include security in their state reviews of agencies under their jurisdiction.

As to fare-free transit.... It is unclear whether the Infrastructure Law could provide funds for fare-free transit. A Jan. 7, 2022, FTA webinar[31] outlines not only safety, but also equity priorities. These include expanding access and opportunity to underserved, overburdened, and disadvantaged communities; incorporating equity into planning and funding decisions; increasing social and economic opportunity by investing in equitable transit projects, and, lastly, assuring that no less than 40 percent of the benefits of FTA investments reach underserved, overburdened, and disadvantaged communities.

Although I am a transit security professional and not a transit planner, while the equity strategies do not mention fare-free travel, I suspect that a planner could easily make fare-free pilot programs fit these priorities.

Recommendations

I would like to leave you with the thought that despite the vast investment of federal dollars, transit in the United States is provided locally or regionally and responds to demands at the local level.

Transit systems have an obligation to their riders—and to their employees—to provide a safe and secure environment.

But if managers believe that those covering their non-federally funded costs are more concerned with providing shelter to the unhoused, injection sites for drug users, and fare-free transit than they are in fixing the broken windows, patrons who can afford to will find other ways to travel and existing staffing vacancies won't get filled.

Thank you for the opportunity to testify on transit policing and transit security. I am happy to answer any questions.

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A recent post on a transit police blog from a manager who asked not to be identified asked what systems were doing about employee absenteeism based on second-hand smoke from fentanyl and what steps systems were taking to air out smoke-filled train cars. One of the responses came from a firm selling solutions for smoke and vapor complaints and for handling discarded hypodermic needles on seats and floors.

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