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PROPOSED POLICY GUIDANCE ON METROPOLITAN PLANNING ORGANIZATION REPRESENTATION

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The New York State Association of Metropolitan Planning Organizations is pleased to submit comments on the proposed policy guidance that will implement the language in MAP-21 requiring that MPOs that are TMAs must include "...representation by providers of public transportation..."

We note that the MPOs in New York State have taken the lead in directly involving transit operators in the planning and decision making process through actions that pre-date the publication of FTA's *Transit at the Table* report a decade ago. The partnership between the Capital district Transportation Committee and the Capital District Transportation Authority was recognized in that report. The fact is that transit is represented not only on our TMA Policy Committees and Boards, but also on those of our five smaller MPOs. The Binghamton Metropolitan Transportation Study was one of the case studies in the subsequent report, *Transit at the Table II* published in 2010.

We support actions that foster a true collaboration of FTA Designated Recipients in the metropolitan planning process, and offer these comments for consideration:

- MPOs have always been provided flexibility in determining their membership. That approach should be retained. For example, there are many municipalities in New York that are Designated Recipients. It is our view that when the chief elected official of that municipality is on the MPO, then transit is clearly considered represented.
- We support the flexibility offered in the guidance for MPOs with multiple Designated Recipients. It is the responsibility of the MPO Board to decide how they will be represented, just as they currently decide how the numerous municipal governments in the Metropolitan Planning Area are represented.
- We strongly believe MPOs should not have to go through what may be onerous administrative actions in terms of their planning agreements, operations plans, or by-laws simply to restate what is already the case, for example that a County Executive represents a local transit system. MPOs ought to be able to simply demonstrate their compliance in a transparent way.

Thank you for considering these comments.

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Chairman
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