



April 23, 2012

Chris Hardej  
New York Metropolitan Transportation Council  
199 Water Street, 22nd Floor  
New York, NY 10038

**Re: Comment on TIP Item 080883**

Dear Mr. Hardej,

The Tri-State Transportation Campaign, a non-profit transportation policy watchdog organization dedicated to creating a more balanced, environmentally friendly and equitable transportation system in New York, New Jersey and Connecticut writes to oppose the deletion of programmed funding for following project in Nassau and Suffolk Counties:

- 080883 - Innovative transit project for new bus service by private operators

The deletion of this project from the Transportation Improvement Program for Nassau and Suffolk County would remove potential funding for the transit systems of both Nassau and Suffolk at a time when more funding is needed to provide the levels of service in demand.

The deletion of this TIP project will remove \$2.625 million over the next three years in Congestion Mitigation and Air Quality funding that could be used to expand existing service or implement new service in Nassau and Suffolk Counties, respectively.

According to the CMAQ Guidelines, Nassau County can use these funds to support ‘the incremental cost of expanding existing transit services.’ In light of service cuts enacted on April 8, 2012 by the Nassau Inter-County Express (NICE) system and its operator Veolia Transportation, Nassau County should not permit these funds to be deleted from the TIP or reprogrammed to other eligible CMAQ uses. While the level of CMAQ funding is unable to restore the cuts that have impacted 60% of NICE routes, it could be used to reinstate some service on some of the higher ridership routes or routes in areas that now have little service remaining.

Congestion Mitigation and Air Quality Guidelines also permit funding to be used for operating assistance for ‘new transit services’. Suffolk County Transit plans to raise fares for its bus service on May 1, 2012, expected to generate \$1 million, and the recently adopted New York

State budget included an additional \$1.5 million in State Transit Operating Assistance (STOA). This new CMAQ funding, coupled with these new revenues, can be utilized to expand service to Sundays on all or the majority of routes. Suffolk County must not permit these funds to be deleted from the TIP or reprogram the funds to other eligible CMAQ uses. Doing so would pass up a unique opportunity to expand Suffolk County Transit's footprint at a time when ridership is up 42% from 2000, the most recent data available.

In an era of limited resources, local governments shouldn't be turning down opportunities to support growing demand for greater transit service. We urge Nassau and Suffolk County to withdraw the deletion of CMAQ funding for innovative bus service and utilize this funding to bolster their transit systems.

Sincerely,

Ryan Lynch  
Policy Director