



July 25, 2025

Marie Therese Dominguez  
Commissioner  
50 Wolf Road  
6th Floor  
Albany, NY 12232-0203

Dear Commissioner Dominguez,

The New York Public Transit Association (NYPTA) is pleased to submit our comments on NYSDOT's draft 2050 Transportation Master Plan. NYPTA represents over 100 public transit systems across the state from the MTA to Watertown CitiBus, transit manufacturers and suppliers, and transit supporters.

We are pleased to see the plan's focus on communities and its support for public transportation and new mobility options, including recommended strategies for:

- Enhanced public transit services and better connections
- Achieving a state of good repair for public transit systems
- Support for the transition to Zero Emission Vehicles
- Identifying and implementing enhanced mobility options
- Promoting smart growth in our communities

We urge you to retain and strengthen the public transit recommendations in the final report.

There are several areas where a stronger emphasis should be added for the strategies highlighted in the report, including coordination of operations between the highway network and public transit systems (e.g. signal pre-emption), and the important role that public transit plays in supporting economic development (e.g. transit service expansion to increase access to workers for new development). Public transit can partner with communities on Transit Oriented Development initiatives that generate revenue by attracting businesses, creating jobs, and increasing property values.

The report highlights the transition of the transportation system to zero-emission vehicles. NYPTA members have been working on this transition for several years and progress has been much slower than anticipated. The additional cost for vehicles and the energy infrastructure required for this transition are significant issues. The additional cost, potential role of low-emission vehicles, and a realistic timeframe for the transition should be cited and adequately discussed in the report.

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Enhancement of public transit systems across the state, implementing new mobility options and improving connections for the things that New Yorkers need to do every day is a laudable goal. We suggest that the plan include more details about these enhancements and new options along with a strategy to track the progress of this work. The strategy should include a reporting mechanism to ensure accountability for the plan components.

We are concerned that the finance section in the report lacks specifics on funding and strategies to finance the state transportation system of the future. There are no strategies or recommendations to develop sustainable revenues to fund the future system, including the operating and capital needs of New York State's vast public transit network. This is critical to NYPTA member systems and their ability to develop long range operating and capital plans. The final report should include a detailed discussion of options to fund the transportation system of the future, including financial forecasts, revenue options, and the impact of not investing.

### **Specific Comments**

The list of transportation plans on page 24 highlights the fact that New York State, with the largest public transit use in the nation, lacks a comprehensive statewide transit plan. NYPTA recommends that at a minimum, the Department restart the publication of the annual report on the condition and needs of the state's public transit systems required under Section 18-b (9) of the Transportation law. Without the ability to report and track the progress of the state's diverse public transit system, it will be difficult to determine the success of any initiative recommended in the plan for 2050.

The transportation funding charts on pages 99 and 100 show information for only highways and the MTA. The report needs to illustrate a statewide investment in all modes of transportation and among all systems in order to depict the balance of investments between modes.

The discussion of funding of transit operations on page 97 and page 99 must include the Statewide Mass Transit Operating Assistance (STOA) program, which provides over \$5 billion in state funding for transit services across the state. The STOA program is a critical part of the funding for more than 100 urban and rural transit systems across New York State; any statewide plan needs to acknowledge the inadequacies of the STOA program and discuss ways to provide enhanced, dedicated revenue sources to fully fund the program into the future.

Transit ridership is included as a performance measure for accessible and affordable transportation. While this is an easily obtained statistic, it is not the best measure of the importance of public transit service in achieving this goal. As we learned during the pandemic, although transit ridership dropped due to stay at home orders, transit systems connected essential workers to their jobs that were critical to the economy and public health. The plan should identify and suggest better measurements for the importance of public transit.



We are not aware of specific outreach by NYSDOT to the state's regional transportation authorities or other public transit agencies prior to release of the draft plan. Our systems can provide specific comments about their needs, the status of new mobility options, plans, and other projects that are needed or underway throughout the state. We urge the Department to make specific contact with these organizations to get direct input on regional issues.

Thank you for the opportunity to comment on the draft plan. If you have questions on NYPTA's comments or need more information, please contact Bob Zerrillo, NYPTA Policy Director ([rzerrillo@nytransit.org](mailto:rzerrillo@nytransit.org)). We look forward to a continued dialogue with NYSDOT on the final plan.

Sincerely,

James Morrell, President