

PUBLIC COMMENTS ON THE DRAFT OKLAHOMA PUBLIC TRANSIT POLICY PLAN

Comment	Response
<p>Oklahoma should have a train system, not just more buses or different bus routes. Although any safe public transportation would be welcome.</p>	<p>Rail was not within the scope of this project. To learn more about rail projects in the state of Oklahoma, please refer to https://oklahoma.gov/odot/programs-and-projects/rail-programs.html.</p>
<p>Amtrak MUST be extended from OKC to Wichita and Newton.</p>	<p>Rail was not within the scope of this project. To learn more about rail projects in the state of Oklahoma, please refer to https://oklahoma.gov/odot/programs-and-projects/rail-programs.html. Additional information can be found in the ODOT Long Range Transportation Plan https://oklahoma.gov/odot/programs-and-projects/transportation-programs/lrtp.html.</p>
<p>The Oklahoma Public Transit Policy Plan needs to be more comprehensive. Consideration given to advancing Oklahoma's social economic development. Specifically in these areas, online commerce, use of alternative energy technologies, high speed communications, and building an advanced economy. Doing so would also assist in securing initial funding, ongoing cost, and future development. Economies of scale lower the cost of business. The same way of thinking can be applied to public transit. Incorporating advances in technology, and multi-use of public transit vehicles and pick up sites. Would have the same economic effect of economies of scale.</p> <p>Individual Transport Vehicles should be designed for short and long distance travel. By developing and using an Oklahoma smart public transport grid. That works to identify public transportation needs, related to work, businesses, and special circumstances. Oklahomans would no longer be limited by region, for work and personal travel. Stimulating the economy in underdeveloped areas.</p> <p>Shipping All vehicles should be used to transport goods, within Oklahoma. Allowing local businesses to compete with out of state companies, online. ODOT could sign agreements with companies. To provide same day delivery. Giving them exclusive rights to use this service. Generating money both for state and local communities.</p> <p>Online Commerce and Wireless Network Using an app, ODOT can provide wireless internet and recharge terminal access. To all passengers and those at pick up sites. Selling ad space on the app to local businesses. Using an app would allow for local businesses to reach travelers passing through.</p> <p>Wind and solar power generation and Electric vehicle recharge stations Excessive power could be sold to electric vehicles at pick up sites.</p> <p>Private public partnerships Companies that allow pick up sites built on their property and willing to hire from rural areas. Could be offered a percentage of revenue earned from electric recharge stations on site. It's kind of a back door tax break by hiring outside labor. Companies that participate would be incentivized to encourage use of electric vehicles.</p> <p>Cooperative standards, regulations, and enforcement. To share the cost of building this transportation network. ODOT could offer partnership agreements with individuals. Similar to franchise, to build and operate pick up sites and vehicles. Within certain sectors. For a certain amount of time. Anyway, I'm not getting paid for this. So this all I'm willing to offer. Eventually, every state will figure this out and it will get done. Even if they have to change some laws to do it. Because it's the smart thing to do. To whom it concerns, enjoy.</p>	<p>This policy plan addressed some of these items within the scope of public transit planning in Oklahoma; however, a number of these items fall within the scope of other state agencies.</p>
<p>If light rail service is not added between larger towns common sense says it won't be dependable with wrecks, road construction and adverse weather conditions.</p>	<p>The Regional Transit Authority in central Oklahoma is currently in the development stages of a light rail plan.</p>
<p>I had an idea while listening to this story on the news. What if Oklahoma had a high speed rail system connecting major hubs in the state such as Oklahoma City, Stillwater, Tulsa, Norman, Durant, and perhaps a western city. These railways could carry patrons to their destination where they could then connect to any rural areas via a regional bus network.</p>	<p>High speed rail was not within the scope of this project. To learn more about rail projects in the state of Oklahoma, please refer to https://oklahoma.gov/odot/programs-and-projects/rail-programs.html.</p>

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<p>I've not seen anything in this plan skimming thru that mandates electrified transit. Is this something on your plan?</p>	<p>Refer to the Plan's 2030 milestone of diversity in alternative fuels; however, this plan did not mandate any specific items, it only provides recommendations.</p>
<p>We need to invest in public transportation, this is a critical piece of infrastructure that we can no longer ignore. Public transportation would help alleviate traffic and parking shortages, as well as providing an essential service to many Oklahomans. An absolute dream of mine would be to have a high-speed rail connect from OKC to Tulsa, and eventually connecting Tulsa to Kansas City and OKC to Dallas.</p>	<p>The plan lays out a long-term strategic investment for public transportation in the state of Oklahoma. High speed rail was not within the scope of this project. To learn more about rail projects in the state of Oklahoma, please refer to https://oklahoma.gov/odot/programs-and-projects/rail-programs.html.</p>
<p>In evaluating unmet needs, we should look beyond US borders for comparable cities for what transit might bring, especially when looking for best practices and what those best practices might do for ridership. For example, Oklahoma City has a similar population and density as Hamilton, Ontario. Oklahoma City is on a regional Amtrak line, and Hamilton, Ontario is also on a regional train line. However, Hamilton, Ontario has many bus routes with 10 minutes or less frequency through the main parts of the day, with 15-30 minute headways till midnight, even on Saturdays and Sundays. That kind of frequency is known to be where ridership jumps significantly. Instead, the Oklahoma Mobility Plan looks at Toledo, Ohio as a comparable city to OKC. Toledo currently does not have any fixed bus routes that go beyond 7:30pm, and no routes on Sunday. Route frequencies are closer to 90 minutes. That's significantly worse service than OKC, and does not make sense to be our guide on how to become a Top 10 state. Finally, for wanting to prioritize transit, additional unmet need in the plan is "adjusted to reflect cases where communities have a more transit-reliant population." However, if we want to have fiscal responsibility on our roads, being interested in reducing road wear and tear, we need a transit system where people wantingly choose a mode of transportation other than their personal car. Mayor of Bogota, Columbia Gustavo Petro says it eloquently: "A developed country is not a place where the poor have cars. It's where the rich use public transportation." That's the goal we should strive for, which many places have demonstrated is feasible within a 20 year timescale.</p>	<p>For the purposes of this plan, it was necessary to look at comparable peer cities within the United States, as financing and funding mechanisms were similar. While systems outside of the U.S. may have desirable transit infrastructure, the investment capabilities and funding mechanisms are not comparable to what is available in Oklahoma.</p>
<ol style="list-style-type: none"> 1. We are wondering about the reasoning for not specifically mentioning the Regional Transit Authority of Central Oklahoma. We think it is worth mentioning particularly in the following areas: when considering solutions for longer commute trips, in the Regional Commuter Needs goal, and throughout the Strategic Investment chapter, just to name a few examples. We understand that this plan is for the entire state, but the RTA will have a great impact on the urban and surrounding suburban areas of the OKC metro. This will be the case potentially with Tulsa as well if an RTA is established there. The RTA is also noteworthy as it will potentially be using FTA funds in the future. Guidance for advanced regional connections are set forth in the 2005 Fixed Guideway Study and 2014 Commuter Corridors Alternatives Analysis Study, as summarized in Encompass 2040 (see the Transit Recommendations on page 98 of Encompass 2040). 2. Consider giving more thought to setting performance measures. If transit agencies are to use the OPTPP as a guide for establishing their own plans, state targets in the OPTPP are essential. Some examples include trips per capita, percent of vehicles in SGR, percent of commutes that utilize public transit, and number/rate of crash fatalities. 3. In the Needs and Future Service chapter, it seems that although more funds need to be available for transit, those funds will not necessarily be distributed equally across the state (some systems will need more depending on their current state of operations, higher percentages of underserved populations, higher density, greater projected population growth, etc.). The breakdown of investment by time span is useful, but by geography may be something to also address. 4. Page 7-9, it would be more consistent if the heading was "Vehicle Expansion" rather than "Expansion Vehicles" 5. The Strategic Investment chapter gives the impression that some goals and objectives will not be addressed right away. Realistically, some aspect of each goal should be "in the works" at all times. For example, on Page 8-6, it gives the impression that Sustainability and Environmental Stewardship will not be addressed until 2030. Some goals will certainly be more important depending on which stage we are in, but each goal should be addressed throughout the process. If this is indeed your intention, perhaps a disclaimer is warranted around page 8-2. 6. Page 9-9 through 9-10, in the STBG and CMAQ section, it may be worth mentioning that Oklahoma is already utilizing some of these funds for transit (at least in the ACOG area). 7. Has there been any consideration of medical facilities assisting with the cost of transit trips to medical appointments? 8. Is there any mention of the importance of and how the state can implement first mile/last mile solutions? For example, in relation to connected bicycle and pedestrian facilities? 	<ol style="list-style-type: none"> 1. The plan provides support and guidance for local efforts, such as the RTA, to enhance transit options. 2. Consideration was given to the development of performance measures in next steps. It is recommended that performance measures are developed in concert with stakeholders involved to ensure the goals of the plan are being met. Performance measures should be developed specific to each agency. 3. The plan discusses alignment at all levels, including alignment at the local level, and the development of local transit planning studies, which will determine funding allotments amongst the agencies. Resource management tools are addressed in the document, to support planning at a local level. 4. The change in heading was made in the document. 5. While the plan sets milestones for what needs to be achieved, the goals of the plan will begin to be addressed immediately. The milestones are set to provide the plan implementors with guideposts throughout the process. 6. The plan provides an option for STBG and CMAQ flexibility at a statewide level and does not specifically look at regional use. 7. The document does address the need for more public-private coordination. 8. The plan provides support for local agencies to determine modes and connection for first and last mile planning.
<p>Establishing regions for coordination is a very good idea, and was implemented in Texas quite a few years ago. One of the stumbling blocks can be the "who gets the \$\$\$" syndrome. Competition for the funding has been established thru the grant process for the 5310, 5311 and other FTA grants. Establishing a sharing concept will make this coordination much easier.</p> <p>I was until very recently a member of the East Texas Region (EasTexConnexcts) which consists of 14 counties and this sharing took several years to establish and become functional. Sorry to say, it can rear its ugly head from time to time.</p> <p>I missed or did not see the inclusion of private transportation providers, other than Greyhound. Local nursing homes, taxi services, churches, etc. can be brought into the planning and implementation of this huge project. With this inclusion of this type of agency, duplication of services can possibly be</p>	<p>Please refer to the Coordinated Public Transit Human Services Transportation Plans that were developed earlier in 2020. They may be found on the ODOT's Office of Mobility and Public Transit website: https://oklahoma.gov/odot/travel/public-transportation-services/public-transportation-resources.html.</p>

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<p>reduced. A lot of these have services for members or residents which makes for idle bus time and duplication of routes. Private non profits are encouraged to partner under FTA guidelines and volunteer services can be counted toward match on several grants. Volunteer services can be simple, such as an attendant on specific routes or more complex such as bus maintenance provided by county for another agency.</p> <p>I am sure you are aware of the “Dump the Pump” day in June as this can become a great advertising tool. With that as a concept and expanding this, how about a series of “events” that a person attends via public transportation with a prize given? An expansion of the Explore Oklahoma theme?</p> <p>I would like to suggest you add ADA training to your list of training priorities.</p> <p>I want to suggest one other idea for now..... What if there was a single application for drivers for any bus company? The drivers could be pulled if needed to another company without lag time in the event of an emergency or staffing shortages.</p>	
<p>The Department of Rehabilitation Services would like to commend the Department of Transportation and the Oklahoma Transit Association on their response to House Bill 1365. Their work in launching a long term response to the growing transit crisis has been swift and concise. The establishment of the Office of Mobility and Public Transit, provides a much needed contact point for improving public transit services, as well as addressing the accessibility issues as we strive for Mobility for All. The Oklahoma Public Transit Policy Plan is a comprehensive and thorough look at the current resources and needs of our state, as well as an exhaustive plan for the future. The work done on this plan has provided data and research elements that the entire state can benefit from. We, at the Department of Rehabilitation Services, appreciate the opportunity to serve as a Stakeholder in this process, and look forward to future collaboration and coordination with ODOT, OTA and other state agencies. Continued stakeholder involvement is essential as the State of Oklahoma strives to establish a coordinated network and become a Top Ten state in public transit.</p>	
<p>Regarding the need for additional education. I am unclear about the plan for providing that education. This is on pages 6-4, 8-3 and 10-2. If OTA is to be a part of providing that education will agencies (Most specifically transit agencies that currently fund OTA) be required to pay additional fees for that training?</p>	<p>The plan sets forth funding resources so that education and training identified as a need through this policy plan will be of no cost to transit providers.</p>
<p>Mobility Management is addressed in many locations throughout this plan. Pages 6-3, 6-5 and 10-2 are some specific locations. I wonder why there would be a need to create a new Mobility Management infrastructure when we have a good start of one that covers more than one quarter of the state. There is already a Mobility infrastructure Management office that has been set up with more than \$1 M of grant funds and paid into also by multiple agencies who have spent thousands of dollars to participate in this. Why would we need to start something new and waste what we already have?</p>	<p>The plan provides for a statewide Mobility Management program that does not currently exist today, with regional coordination under that plan. It also allows for expansion of Mobility Management infrastructure that is already in place, and/or to expand on what has already been created or envisioned under upcoming pilot projects.</p>
<p>I wanted to say that I think this plan is a wonderful start toward moving Oklahoma forward. I am proud to have participated in the process.</p>	
<ol style="list-style-type: none"> 1) Page 4-9 - Paragraph 1 mentions Appendix D. We would suggest that Appendix D also take a note of numerous non-profits funded by Section 5310 by ODOT and INCOG. Examples include: New Leaf, Morton Comprehensive Health Services, A New View etc., Many other human service organizations, churches, profit and other non-profits also provide demand response services to their clients outside of the federal funding programs. 2) Pages 4-15 - INCOG 5310 program also funds both capital and operations in Tulsa Metropolitan Area, complementing the ODOT administered Section 5310 program. We recommend recognizing the program and its scope in the Tulsa urbanized area. INCOG has granted \$4M in federal funds for traditional capital needs such as vehicles and non-traditional needs such as operating expenses, contracts, and connections to transit facilities improvements since 2013. Forty-five vehicles were purchased by various non-profits and transit agencies that serve Tulsa and surrounding areas. 3) Related to page 6-3, 6-5, and 8-4: We would ask to recognize the currently operational single source of scheduling information through the Mobility Management Center housed at Pelivan Transit, in Big Cabin, Oklahoma, that has been fully operational since 2016 and currently sending dispatches to 29 rural counties across the state of Oklahoma. Grand Gateway Economic Development Association and the Indian Nation Council of Governments (INCOG) have secured an estimated \$1.4 million federal and local dollars to fund the regional call center. All providers of the Veterans Ride Connect (VRC) that include Pelivan Transit, Muskogee County Transit, Muskogee Creek Nation, Ki Bois Area Transit System, JAMM Transit and the Cimarron Transit System utilize the center. The process to implement the call center began in 2011, MOU’s between the agencies have been in place since 2014 and the program has been operating since 2016. 	<p>Please refer to the Regional Public Transit-Human Service Coordinated Plans (developed by both ODOT and INCOG) for a comprehensive discussion on non-profits and their role in coordinated planning. In Chapter 4, there is a discussion of INCOG and their relationship to the region, as well as their role in distributing 5310 funding. References may be found on page 4-16, and a full discussion of INCOG and their role may be found in Appendix D, beginning at page D-47.</p> <p>The plan provides for a statewide Mobility Management program that does not currently exist today, with regional coordination under that plan. It also allows for expansion of Mobility Management infrastructure that is already in place, and/or to expand on what has already been created or envisioned under upcoming pilot projects.</p>
<p>It is confusing and concerning that the OPTPP draft does not reference already existing innovative, transformative projects that have been invested in and operational in the state of Oklahoma. FTA and provider investment in the already existing Pelivan Transit mobility management center, located in Big Cabin, Oklahoma, is approximately \$5 million. Expansion of the project would be the most beneficial, cost effective, and expedient investment for the state of Oklahoma.</p> <p>Please consider that six transit providers are already utilizing the Pelivan Transit mobility management center, which has been fully operational since 2016 and currently dispatches 29 rural counties across the state of Oklahoma. This coordination has resulted in the more than 65,000 discounted trips to veterans throughout the service area of the Veterans Ride Connect (VRC) project. Grand Gateway Economic Development Association and the Indian Nation Council of Government (INCOG) secured an estimated \$1.4 million federal and local dollars (through grant and match money) to fund the regional call center in 2011.</p>	<p>Please refer to the Regional Public Transit-Human Service Coordinated Plans (developed by both ODOT and INCOG) for a comprehensive discussion on non-profits and their role in coordinated planning. In Chapter 4, there is a discussion of INCOG and their relationship to the region, as well as their role in distributing 5310 funding. References may be found on page 4-16, and a full discussion of INCOG and their role may be found in Appendix D, beginning at page D-47.</p> <p>The plan provides for a statewide Mobility Management program that does not currently exist today, with regional coordination under that plan. It also allows for expansion of Mobility Management infrastructure that is already in place, and/or to</p>

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<p>VRC is comprised of (Pelivan Transit, Muskogee County Transit, Muskogee Creek Nation, KiBois Area Transit System, JAMM Transit and Cimarron Transit System). Since 2014, MOU's among the agencies and the program has been operating since 2016. HB1365 designates the VRC as a statewide project. The VRC is the single operational mobility ecosystem in the state of Oklahoma funded through social service agencies (Jack C. Montgomery), the Cherokee Nation, state funds and private donors.</p> <p>In addition, four of the six aforementioned providers have secured an additional \$1.5 million in Federal Transit Administration (FTA) grant funds to implement a regional on-demand transportation system known as PICK Transportation that will operate from the existing call center. With the operational match committed by the members of PICK Transportation the total project cost is \$3.3 million. This is the only rural transit project in the country that is offering an on-demand option in rural America. After the pilot project, the technology would be accessible to all rural transits for the cost of licensing and portal access, which could partially be subsidized through current annual RTAP allocations.</p> <p>The Northeast Tribal Transit Consortium (Peoria, Eastern Shawnee, Shawnee, Seneca Cayuga, Wyandotte, Oologah, Ottawa, Miami and Modoc Tribes of Oklahoma) is also dispatched through the existing call center.</p> <p>The Oklahoma Public Transit Policy Plan (OPTPP), references existing opportunities on page 4-32. The mobility management center at Pelivan Transit is an existing opportunity.</p> <p>The OPTPP on page 4-35 explains that ODOT and OTA can create a centralized statewide mobility management center. It references regional mobility managers, statewide call center, single-trip information and scheduling portal to be accessed on a statewide level. It references a universal fare system and a process of transfer between agencies which is the structure that is already in place and has been fully operational since 2016.</p> <p>On page 6-3 the OPTTP references establishing a statewide mobility management project. There is already a mobility management center.</p> <p>The OPTPP on page 6-5 references creating a coordinated platform interface (app) for a single source of scheduling. This is the existing function of PICK Transportation.</p> <p>On page 8-3 the plan references establishing a statewide mobility management program. This should be an expansion of the existing mobility management center which is fully equipped and does not need to be ESTABLISHED but rather EXPANDED.</p>	<p>expand on what has already been created or envisioned under upcoming pilot projects.</p>
<p>The OPTTP on page 8-4 references a single source of scheduling information, state platform, public-facing technology enhancements to improve access to and coordination of public transit. This project already exists in Oklahoma through the FTA grant awarded to implement the PICK Transportation and VRC projects.</p> <p>Many of the plans referenced are already fully operational in Oklahoma. The existing call center is capable of expanding to provide many of the services outlined in the OPTTP. Does the state intend to invest in the existing structure or expend all new funds to recreate what is already been funded and operational?</p> <p>Section 5310 - Why was INCOG not included on page 4-15? The plan references human services transportation but makes no mention of INCOG, which is a reliable source of funding for several transit providers including all of members of the VRC. INCOG provides a flexible 5310 program that supports operating and capital funds to several rural and tribal (5311 and 5311c) transit providers. INCOG has provided more than \$4 million. Currently, more than 45 vehicles are operating under 5311 rural providers coming into the Tulsa Metro Area (TMA), which is expanding next year, thereby, increasing the benefit to providers utilizing this funding.</p> <p>Coordinated Plans and Regions (6-6)- How many regions and or plans will we be expected to participate in. Currently, several of us participate in VRC and PICK. We are also required to participate by region in the 5310 Program Coordinated Human Service Transportation Plan. Under Strategic Investment (8-4) the plan mentions a local five-year plan. Currently as part of the annual Section 5311 application, local transit systems are required to submit a three-year plan. We don't need another plan to be duplicative and an additional unnecessary administrative burden.</p> <p>Education/Training: Has it be considered that training is free through National Rural Transit Assistance Program (NRTAP). NRTAP provides technical assistance, elearning resources for all transit staff from drivers, to dispatchers to managers. Peer exchange meetings are held for anyone to participate with colleagues around the nation. We have used these free resources for years. They continually update material as needed. (6-5, 8-3) There are toolboxes and material for formal training, tips, best practices on all transit related topics.</p> <p>Excellent peer exchange and educational opportunities are also available through South West Transit Association Community Transportation Association of America. I am concerned about the need to reinvent professional development opportunities under OTA when better options are in place.</p> <p>6-7 There was an effective collaboration of state agencies with an interest in public transit through the Oklahoma United We Ride Council. This collaboration was severed after the law was passed. This council remains as a viable opportunity to be considered in the plan. Has this council been factored into the plan? It checks several boxes!</p> <p>7-9 Please consider factoring the need for expansion vehicles due to socially distancing protocols. I believe these standards will to be necessary even with a vaccine into the future.</p> <p>Technology & /Budgets - When addressing the need for investment of technology, there is no mention of the continued maintenance and licensing fees that accompany such investments. Were these costs factored in?</p>	<p>This policy plan calls for the creation of localized strategic plans so that once funding is received, agencies may have a plan for how to strategically allocate the funding for transit projects.</p> <p>On June 3, 2020, Governor Kevin Stitt signed Executive Order 2020-21, disbanding United We Ride in Oklahoma at the request of the Department of Rehabilitation Services. ODOT and the OMPT will develop an advisory group, comparable to the United We Ride Council, to represent transportation disadvantaged populations and social service agencies.</p> <p>Covid-19 was acknowledged in this plan; however, since the timing of the pandemic is unknown, and the plan's horizon is 20 years, it was more appropriate to focus on long-term outcomes and goals for the plan implementation.</p> <p>On page 7-11, the plan specifically provides for technology costs through each implementation year.</p> <p>The plan responds to an identified need to have additional training in the state of Oklahoma. Materials from SWTA, RTAP, and other associations may be used in developing a training program, but trainings from these associations will not be duplicated. Training is also necessary for staff transitions and succession planning.</p>

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<p>At this time, six transit providers are utilizing the Pelivan Transit mobility management center in Big Cabin, Oklahoma. The regional mobility center has been fully operational since 2016 and currently dispatches 29 rural counties across the state of Oklahoma, coordinating the successful provision of more than 65,000 discounted trips to veterans throughout the service area of the Veterans Ride Connect (VRC) project. Grand Gateway Economic Development Association and the Indian Nation Council of Government (INCOG) have secured an estimated \$1.4 million federal and local dollars (through grant and match money) to fund the regional call center, and all providers of the VRC (Pelivan Transit, Muskogee County Transit, Muskogee Creek Nation, KiBois Area Transit System, JAMM Transit and Cimarron Transit System) utilize the center. The process to implement the call center's development began in 2011. MOU's among the agencies have been in place since 2014 and the program has been operating since 2016. HB1365 designates the VRC as a statewide project. The VRC is the single operational mobility ecosystem in the state of Oklahoma. It is funded through social service agencies (Jack C. Montgomery VA Hospital), Cherokee Nation, state funds and private donors (St. Francis Medical Center, American Legion, Rotary Club, private grantors).</p> <p>The expansion of the existing center would be beneficial and the most cost effective, expedient process for the state of Oklahoma.</p> <p>In addition, four of the six aforementioned providers have secured an additional \$1.5 million in Federal Transit Administration (FTA) grant funds to implement a regional on-demand transportation system known as PICK Transportation that will operate from the existing call center. With the operational match committed by the members of PICK Transportation the total project cost is \$3.3 million. This is the only rural transit project in the country that is offering an on-demand option in the country.</p> <p>Total FTA and provider investment in the call center is approximately \$5 million.</p> <p>The Northeast Tribal Transit Consortium (Peoria, Eastern Shawnee, Shawnee, Seneca Cayuga, Wyandotte, Oologah, Ottawa, Miami and Modoc Tribes of Oklahoma) is also dispatched through the existing call center.</p> <p>The Oklahoma Public Transit Policy Plan (OPTPP), references existing opportunities on page 4-32. The mobility management center at Pelivan Transit should be included as an existing opportunity.</p> <p>The OPTPP on page 4-35 explains that ODOT and OTA can create a centralized statewide mobility management center. It references regional mobility managers, statewide call center, single-trip information and scheduling portal to be accessed on a statewide level. It references a universal fare system and a process of transfer between agencies which is the structure that is already in place and has been fully operational since 2016.</p> <p>On page 6-3 the OPTTP references establishing a statewide mobility management project. There is already a mobility management center.</p> <p>On page 6-3 the OPTTP references creating a single source of information and coordination platform. The VRC is already fully operational in this capacity.</p> <p>The OPTPP on page 6-5 references creating a coordinated platform interface (app) for a single source of scheduling. This is the existing function of PICK Transportation.</p> <p>On page 8-3 the plan references establishing a statewide mobility management program. This should be an expansion of the existing mobility management center which is fully equipped and does not need to be ESTABLISHED but rather EXPANDED.</p> <p>The OPTTP on page 8-4 references a single source of scheduling information, state platform, public -facing technology enhancements to improve access to and coordination of public transit. This project already exists in Oklahoma through the FTA grant awarded to implement the PICK Transportation and VRC projects.</p> <p>Many of the plans referenced are already fully operational in Oklahoma. The existing call center is capable of expanding to provide many of the services outlined in the OPTTP. Does the state intend to invest in the existing structure or expend all new funds to recreate what is already been funded and operational?</p> <p>Finally, on page 4-15 the plan references human services transportation but makes no mention of INCOG, which is a reliable source of funding for several transit providers including all of members of the VRC. INCOG has a limber 5310 program that provides operating expenses to several rural and tribal (5311 and 5311c) transit providers. INCOG has provided funding to purchase more than 40 vehicles to providers coming into the Tulsa Metro Area (TMA) which is expanding next year therefore increasing the benefit to providers utilizing this funding.</p> <p>The lack of reference to already existing innovative, transformative projects that have been invested in and operational in the state of Oklahoma's public transit system is confusing.</p>	<p>The plan provides for a statewide Mobility Management program that does not currently exist today, with regional coordination under that plan. It also allows for expansion of Mobility Management infrastructure that is already in place, and/or to expand on what has already been created or envisioned under upcoming pilot projects.</p> <p>Please refer to the Regional Public Transit-Human Service Coordinated Plans (developed by both ODOT and INCOG) for a comprehensive discussion on non-profits and their role in coordinated planning. In Chapter 4, there is a discussion of INCOG and their relationship to the region, as well as their role in distributing 5310 funding. References may be found on page 4-16, and a full discussion of INCOG and their role may be found in Appendix D, beginning at page D-47.</p>
<p>Thank you for a very thorough plan outlining public transit needs in our great state of Oklahoma. Although the effort is appreciated, there are concerns in the plan's failure to recognize Pelivan Transit as the regional mobility management center it currently serves as and has served as since an approximate \$700,000 FTA/ODOT SGR investment in 2014 which provided for the construction of an impressive eight bay maintenance facility and regional call center. Since that initial investment, Pelivan Transit and our regional transit partners have worked together to secure additional funding to operate the Veterans Ride Connect Program across 29 counties. Those same public transit partners have invested significant time and effort into securing a 1.5 million dollar grant specific to mobility management. Given that we currently operate this mobility management system in 29 of our 77 Oklahoma counties, we are understandably concerned about the future of our great partnership and want to ensure that ODOT takes this into</p>	<p>The plan provides for a statewide Mobility Management program that does not currently exist today, with regional coordination under that plan. It also allows for expansion of Mobility Management infrastructure that is already in place, and/or to expand on what has already been created or envisioned under upcoming pilot projects.</p>

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<p>consideration in finalizing this plan. We have been working toward a strong future in mobility management since 2014 and now we are poised and ready to serve and would like to see mention that ODOT recognized this and intends to assist us in our mobility management endeavors.</p>	
<p>In reviewing the draft of the transit plan I agree that a call center should be coordinated at the state level and not any NPO or single transit system. This would not be in the best interest of state-wide coordination which is our goal.</p>	<p>The plan provides for a statewide Mobility Management program that does not currently exist today, with regional coordination under that plan. It also allows for expansion of Mobility Management infrastructure that is already in place, and/or to expand on what has already been created or envisioned under upcoming pilot projects.</p>
<ol style="list-style-type: none"> 1. Mission Statement: The mission statement creates a sense of community within the state. Assurance of a coordinated statewide public transit network is needed within the state for all public transit systems to feel valued for the work they do. All Oklahomans deserve the availability of public transit that meets their needs and provides quality services to all. 2. Outreach: As stated in this section ODOT received more responses to a survey than they ever have before. This shows that the systems can come together to create a more advantageous way of getting information that is reliable and efficient throughout the state. Rural transit systems such as JAMM have been working on customer satisfaction surveys for many years and have created a vast network of people who understand how important surveys are and they take the time to complete information that could be valuable to the systems and state. Rural systems know how important medical services are to the individuals who seek our services often as we transport many individuals on a daily basis to medical appointments throughout the state utilizing the NEMT services provided through LogistiCare. The expansion of Medicaid will create a bigger need within the state for transportation and rural systems need to be prepared for this increase. To do this, understanding NEMT is a vital component of our statewide management plan. Transit is the only option for mobility for many people in the rural areas and establishing effective transportation resources for all in a collaborative method will help alleviate the lack of transportation to many. 3. Local Funding: The policy plan touches on the fact that many systems do not receive local funding. This has been an issue for many rural systems and the knowledge of it here shows a progression to the state leadership to know that we are struggling to find resources to match federal and state dollars in order to continue operations. While match money has always been a component of any agency receiving funding it is noteworthy to mention it can and has been a struggle for many systems to establish matching dollars to assist with the public transportation in many rural communities. This of course, brings us back to NEMT funding being a primary resource for many of the rural systems. In order to provide match funding NEMT must be carved out of the new plans to establish a better quality of transportation to the people who need it the most. NEMT needs to be managed by an in-state entity with a statewide understanding of transportation and mobility that does not gain a huge profit while giving transit providers pennies. 4. 5310 Funding: DHS was the oversight for the 5310 funding since its inception and the burden that it placed on the systems prevented many of us from applying. For some of the rural systems the only option to receive vehicles was to apply for funding through DHS. For many years JAMM Transit refused to apply for funding because the reporting mechanisms were strenuous on our bookkeeping staff as well as meeting the demands of the program was difficult. The change to the OMPT was welcomed by many of the agencies because we knew that it would have a beneficial impact on us in getting additional/replacement vehicles within our fleet in a way that was less burdensome. Thus far ODOT's reporting capabilities have greatly exceeded any that were required by DHS. 5. Non-Emergency Medical Transports: This section highlights where we stand with our current NEMT concerns. With the expansion of Medicaid we know the trips will increase and we (transit agencies) need to be able to capture these trips effectively to establish a well-balanced transportation network of continued coverage. Public Transit agencies undergo rigorous training, vehicle inspections, and must maintain compliance in many areas to perform these trips and we do this because it is an essential component of transportation as well as it brings the match funding needed to operate the system as a whole. The plan notes an IG report that Oklahoma's NEMT program fails to meet federal regulations. This is due to brokers using transportation providers that do not provide training, don't meet drug and alcohol requirements, don't provide the necessary tracking, and don't operate ADA vehicles. A statewide certification program should be implemented to ensure any NEMT transportation provider meets all requirements and regulations. 6. Service Area Coordination: Many systems have not coordinated in an effort to be more effective and this is primarily due to the restrictions in place according to the boundaries we cover. Systems are afraid another system will take over the area and cause them to lose funding. An effort to bring the systems together in a coordinated manner with the intent on providing more services to all Oklahomans can create a lot more benefits to the people. An example of this is that there is a small town that borders another, the system there was struggling to keep up with NEMT trips, the system that could help was denied entering that area because there was no agreement in place. In the end the people were the ones who lost out the most on this scenario because the system that could transport them was disallowed by the system in place. Coordinated service efforts are needed to better establish quality of service to all. Working together creates better mobility opportunities. 7. Human Services Transportation: On this map I think it would be more beneficial to show that there are vehicles in more than the one county where the vehicles are "listed" as being. For JAMM we have three vehicles total with one being in Johnston, Marshall, and Murray Counties. I think showing it this way would show that more of the state is covered with these vehicles than just the county they are registered in. 	<p>These comments support the findings of the plan.</p> <p>The plan provides for a statewide Mobility Management program that does not currently exist today, with regional coordination under that plan. It also allows for expansion of Mobility Management infrastructure that is already in place, and/or to expand on what has already been created or envisioned under upcoming pilot projects.</p>

Comment	Response
<p>8. Mobility Management: A statewide mobility management program with regional coordinators is needed within the state to create a transparent structure for all systems. The goal of creating a statewide mobility management system has the ability to enhance all agencies in an equal and diverse manner. Ohio is a great example of a mobility management system that has been effective throughout the state. Creating a structure similar to this will be advantageous for Oklahomans and the public transit systems will benefit greatly by having a system in place that fully supports them equally and establishes a transparent view of the systems throughout Oklahoma. It is absolutely necessary for the mobility management program to be coordinated at the state level with agencies working together regionally as the needs of one region of the state are different from others and one area should not attempt to dictate or control what another area does. Establishing a coordinated plan to effectively schedule and coordinate transportation with the systems within the state is something we have needed for many years.</p> <p>9. Call Center: One of the most advantageous adventures the state can embark on is a call center linked in with the statewide Mobility Management program that can benefit the entire state accordingly. One of the resources we lack in public transportation is a coordinated effort to link all systems together. Implementing a call center that can encompass the state resources under one house will enable providers the ability to get their information to a centralized location and the people will be able to call in and find resources. No one agency nor no one scheduling software system should dictate to other agencies and therefore any single platform approach must be done at the state level. Different platforms and/or systems currently exist across the state and not one of those should dominate the other. A statewide platform, developed at the state level, allows for each system to have autonomy while providing a seamless front to the passenger.</p> <p>10. Transit Agency Marketing, Education, and Information: OTA has developed and implemented valuable training over the last few years. The new structure of OTA has greatly improved by providing training which will impact the transit systems throughout the state in a positive way. Marketing is one of the things transit systems struggle with, their budgets cannot support a marketing director, so having more marketing aspects available to the systems can be beneficial to provide information out to the people about what services are available to them. One of the things JAMM did last year was a heavy marketing campaign to ensure the image of JAMM was not seen as senior transportation after 20 years of public services. The campaign has proven to be very effective. JAMM had additional resources that allowed for the campaign to take place but many systems do not have this ability. Utilizing a mechanism to assist in marketing structures throughout the state will give a bigger view of transit systems and their availability to assist more people in mobility.</p>	