MEMORANDUM

TO: GTC Planning Committee Members & Alternates

FROM: James Stack, Executive Director /s/

DATE: May 2, 2019

SUBJECT: Proposed Council Resolution 19-52 (Certifying that all Federal planning requirements are met)

Every four years, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) perform a comprehensive certification review of the transportation planning processes conducted by GTC in its role as the designated Metropolitan Planning Organization for the Genesee-Finger Lakes Region. The last FHWA/FTA certification of GTC was made in July 2017.

In the intervening years, concurrent with the submittal of the entire proposed Transportation Improvement Program (TIP) to the FHWA and the FTA as part of the Statewide TIP approval,, GTC is required to "self-certify" that its policy, planning, and programming processes are consistent with applicable federal and state laws as well as regional and local priorities. This certification takes the form of a Self-Certification Document, the content of which is specified by NYSDOT.

The following items are provided for your consideration:

1. **Proposed Council Resolution 19-52** (Certifying that all Federal planning requirements are met) and the **2019 Self-Certification Document**.

   GTC staff has prepared the 2019 Self-Certification Document in accordance with NYSDOT guidelines.

Recommended Action:

Recommend action by GTC Board on proposed Council Resolution 19-52, certifying that all Federal planning requirements are met.

GENESEE TRANSPORTATION COUNCIL

RESOLUTION

Resolution 19-52 Certifying that all Federal planning requirements are met

WHEREAS,

1. The Genesee Transportation Council (GTC) is the designated Metropolitan Planning Organization (MPO) responsible for the transportation policy, planning, and programming processes for the nine-county Genesee-Finger Lakes Region, including the Rochester Metropolitan Planning Area;

2. It is the responsibility of GTC to insure that said policy, planning, and programming processes are consistent with applicable federal and state laws as well as local area objectives;

3. Title 23 Part 450.334 of the Code of Federal Regulations (23 CFR 450.334) requires that, concurrent with the submittal of the entire proposed Transportation Improvement Program (TIP) to the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) as part of the Statewide TIP approval, the State and the MPO certify to the FHWA and the FTA that the planning process is addressing the major issues facing the area and is being conducted in accordance with all applicable requirements; and

4. This certification takes the form of a Self-Certification Document.

NOW, THEREFORE, BE IT RESOLVED

1. GTC hereby affirms that its metropolitan transportation planning process includes activities to support the development and implementation of the Long Range Transportation Plan and the Transportation Improvement Program and subsequent project development activities including the environmental impact assessment process;

2. GTC hereby certifies that the GTC planning process is being conducted in conformance with all applicable requirements of:
   a. Title 23 Section 134 of the United States Code (23 U.S.C. 134) and 49 U.S.C. 5303;
   b. Sections 174 and 176 (c) and (d) of the Clean Air Act, as amended (42 U.S.C. 7504, 7506 (c) and (d)) and 40 CFR part 93;
   c. Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000d–1) and 49 CFR part 21;
   d. 49 U.S.C. 5332, prohibiting discrimination on the basis of race, color, creed, national origin, sex, or age in employment or business opportunity;

e. 49 CFR part 26 regarding the involvement of disadvantaged business enterprises in USDOT funded projects;
23 CFR part 230, regarding the implementation of an equal employment opportunity program on Federal and Federal-aid highway construction contracts;

f. The provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 *et seq.*) and 49 CFR parts 27, 37, and 38;

g. The Older Americans Act, as amended (42 U.S.C. 6101), prohibiting discrimination on the basis of age in programs or activities receiving Federal financial assistance;

h. 23 U.S.C. 324 regarding the prohibition of discrimination based on gender; and

i. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and 49 CFR part 27 regarding discrimination against individuals with disabilities.

3. GTC hereby requests that New York State join in this affirmation and certification and forward this joint State and MPO finding to both FHWA and FTA.

CERTIFICATION

The undersigned duly qualified Secretary of the Genesee Transportation Council certifies that the foregoing is a true and correct copy of a resolution adopted at a legally convened meeting of the Genesee Transportation Council held on June 13, 2019.

Date _____ _____

KEVIN C. BUSH, Secretary
Genesee Transportation Council

GENESEE TRANSPORTATION COUNCIL

2019 SELF-CERTIFICATION DOCUMENT

A. Required Agreements

All required agreements are current and active. A cooperative agreement, made as of June 18, 2009, by and among the Genesee Transportation Council (GTC), New York State Department of Transportation (NYSDOT), and Rochester Genesee Regional Transportation Authority (RGRTA) identifies and specifies the responsibilities and cooperative procedures for carrying out transportation planning (including without limitation corridor and subarea studies) and programming consistent with Title 23 Section 450 (23 CFR 450) Subpart C of the Code of Federal Regulations.

A cooperative agreement, made as of June 20, 2018, between the GTC, NYSDOT, and RGRTA that articulates the roles and responsibilities of each party regarding the establishment of transportation performance measures and associated Targets, sharing information on the Targets, and reporting on progress toward achieving those Targets consistent with Title 23 Section 450.314(h)(1) of the Code of Federal Regulations.

The requirements for a TIP Financial Plan are specified in 23 CFR 450.326(j). For purposes of transportation operations and maintenance, the financial plan shall contain system-level estimates of costs and revenue sources that are reasonably expected to be available to adequately operate and maintain Federal-aid highways (as defined by 23 U.S.C. 101(a)(6)) and public transportation (as defined by title 49 U.S.C. Chapter 53).

On December 11, 2018, the NYSDOT issued the TIP/STIP Policy Guidance and Instructions for the Update Period Beginning October 2019. The Guidance included the amounts of Federal Highway Administration (FHWA) funds by program that are being made available to the GTC/NYSDOT-Region 4 TIP area (Planning Targets) for Federal Fiscal Years (FFYs) 2020 through 2024. On February 15, 2019, NYSDOT provided estimated amounts of FTA Section 5307 and FTA Section 5339 funding to be allocated to RGRTA as the designated recipient for the Rochester, NY Urbanized Area. GTC staff discussed the NYSDOT estimates with RGRTA and all agreed that the estimates were reasonable.

The GTC adopted *FFY 2020-2023 Transportation Improvement Program* contains a financial summary indicating reasonably available revenues by source and year along with expenditures by source and year to demonstrate fiscal constraint consistent with Title 23 Section 450.326(j) of the Code of Federal Regulations.

B. Planning/Technical

1. Unified Planning Work Program

The *FY 2019-2020 Unified Planning Work Program (UPWP)* was adopted on March 7, 2019; it progresses several key elements of the LRTP. Several initiatives are currently underway including, but not limited to, projects that address:

- Economic vitality of the region (e.g., Genesee-Finger Lakes Scenario Tool
- Safety of the transportation system (e.g., Monroe County High Accident Location Program, NYSDOT Safety Investigations and Analysis, Wayne County High Accident Location Study, and Vulnerable Users Safety Assessment Program)
- Security of the transportation system (e.g., I-490 Integrated Corridor Management (ICM) Plan)
- Accessibility and mobility of people and freight (e.g., Ontario Midland Strategic Plan)
- Protect and enhance the environment, promote energy conservation, and improve quality of life (e.g., Implementing Complete Street in the G-FL Region; A Guidebook, State Route 332 & Route 96 Sub-Area Study, and Mt. Morris-Leicester Route 36 Corridor Study)
- Enhance the integration and connectivity of the transportation system, across and between modes (e.g., Circulation, Accessibility, and Parking (CAP) Studies in several communities, Uptown Canandaigua Mixed-Use & Transportation Corridor Feasibility Study, Maple Ridge Road Corridor Pedestrian and Bicycle Accommodations Feasibility Study, and Active Transportation Plans in several communities)
- Promote efficient system management and operations (e.g., Genesee-Finger Lakes Regional Performance Measurement Monitoring and Evaluation System, Livingston County Human Services Trip Planning Website, RTS Access Ridership and Facility Evaluation, and Greater Rochester Transportation Management Association Feasibility Study)
- Emphasize the preservation of the existing transportation system (e.g., Monroe County Traffic Signal/Sign Pole Asset Management and O'Rorke Bridge Operations and Maintenance Analysis and Strategy)
- Improve the resiliency and reliability of the transportation system (e.g., Security and Resiliency Planning and Genesee-Finger Lakes Regional Bridge Assessment Vulnerability Assessment)
- Enhance travel and tourism (e.g., Livingston County Downtown Wayfinding Master Plan and Lake Ontario State Parkway Transportation Alternatives Feasibility Study)

Projects like those noted above are not atypical in the annual work program and have been completed under recent UPWPs.

The Goals and Objectives of the *Long Range Transportation Plan for the Genesee-Finger Lakes Region 2040* (LRTP 2040) serve as the Priority Areas of the UPWP which are the basis for selecting tasks to be included in it, assuring that the UPWP advances the *LRTP 2040*. A matrix presenting the relationship between UPWP tasks and the *LRTP 2040* is included in the *FY 2019-2020 UPWP*.

2. Long Range Transportation Plan

The *Long Range Transportation Plan for the Genesee-Finger Lakes Region 2040* (LRTP 2040) was adopted on June 9, 2016.

On February 16, 2018, the United States Court of Appeals for the District of Columbia Circuit in South Coast Air Quality Mgmt. District v. EPA ("South Coast II," 882 F.3d 1138) held that transportation conformity determinations must be made in areas that were either nonattainment or maintenance for the 1997 ozone national ambient air quality standard (NAAQS) and attainment for the 2008 ozone NAAQS when the 1997 ozone NAAQS was revoked. These conformity determinations are required in these areas after February 16, 2019.

The Rochester, New York Nonattainment Area (Rochester Nonattainment Area) was classified "nonattainment" at the time of the 1997 ozone NAAQS revocation on April 6, 2015 and was also designated attainment for the 2008 ozone NAAQS on May 21, 2012. Therefore, per the South Coast II decision, a conformity determination must be made for the 1997 ozone NAAQS on the *LRTP 2040* and the *FFY 2020-2024 TIP*.

GTC adopted a conformity statement for the *LRTP 2040* and the *FFY 2020-2024 TIP* on June 13, 2019. It is anticipated that a Conformity Determination will be completed by the New York State Air Quality Interagency Consultation Group (NY ICG) in summer 2019, consistent with CAA requirements, existing associated regulations at 40 CFR Parts 51.390 and 93, and the South Coast II decision, according to EPA's Transportation Conformity Guidance for the South Coast II Court Decision issued on November 29, 2018.

The Rochester Nonattainment Area consists of Genesee, Livingston, Monroe, Ontario, Orleans, and Wayne Counties.

The *LRTP 2040* is fiscally constrained and provides appropriate descriptions of policies and actions for the public to understand the type of work to be conducted. A financial plan that included updated revenues and costs in "year of expenditure dollars" was developed for the *LRTP 2040*. The *LRTP 2040 Update* meets the fiscal constraint requirement of and addresses the required elements of MAP-21 and the FAST Act. Key elements of the *LRTP 2040* will be advanced for further study through the UPWP process.

For *LRTP 2040*, GTC went out directly to the community and used social media, along with more traditional forms of public involvement. The first four development phases of the plan included significant community input gathered from August 2014 through March 2015. During this time GTC staff went directly to our customers at 13 venues across the Region (e.g., farmers markets in all the nine counties, regional

malls), developed an interactive WikiMap, and sought feedback through Twitter. A direct mailing offering to meet in person was sent to over 250 contacts including approximately 190 stakeholder groups listed in the GTC Environmental Justice database of organizations representing populations not traditionally well-represented in the transportation planning process. GTC met directly with interested stakeholder groups at their convenience. GTC also held two public meetings, organized as open houses with multiple stations for attendees to talk with us one-on-one instead of the traditional presentation followed by a question and answer session.

Beyond being available to receive input on specific dates and times, GTC developed two online surveys that garnered approximately 200 responses. A separate survey specifically for businesses that rely on moving goods and materials was developed and distributed.

In the spirit of continuing public engagement, GTC created a stand-alone public review document in the winter of 2016 to conduct the second formal round of public review. GTC produced a document that was attractive and digestible for the public and member agencies. The document presented the feedback heard through Customer Engagement efforts and presented a set of draft recommendations. It was made available for public review from February 16, 2016 through March 18, 2016. The document presented feedback from the first round of Customer Engagement, the amount of funding that is available through 2040, a complete listing of all the proposed recommendations, along with the next steps in the LRTP process. In order to gain feedback from members of the public, three sets of open-house style meetings were held. These meeting were held in the afternoon and again in the early evening to provide multiple options for the public. Aside from notifying media outlets, direct meeting notices were sent to approximately 190 stakeholder groups listed in the GTC Environmental Justice database.

In order to involve a broader range of stakeholders, GTC consulted with a number of partners responsible for land use management, natural resources, environmental protection, conservation, and historic preservation by providing direct notification of the opportunity to review and comment on LRTP 2040. These partners included federal agencies such as the U.S. Department of Housing & Urban Development and the U.S. Army Corps of Engineers, New York State agencies such as the Office of Parks, Recreation, and Historic Preservation, regional agencies such as the Center for Disability Rights and the Landmark Society of Western New York, local groups such as the Keuka Lake Association and the Genesee County Soil & Water Conservation District, and a tribal government, the Tonawanda Band of Senecas.

3. Transportation Improvement Program

The *2020-2024 Transportation Improvement Program (TIP)* was adopted by the GTC Board (Policy Committee) at its June 13, 2019 meeting and takes effect October 1, 2019. The TIP is being appropriately managed as specified in related federal and state guidelines. Fiscal constraint and consistency with the LRTP is maintained.

As previously noted, a conformity determination must be made for the 1997 ozone NAAQS on the *LRTP 2040* and the *FFY 2020-2024 TIP*. GTC adopted a conformity

statement for the *LRTP 2040* and the *FFY 2020-2024 TIP* on June 13, 2019. It is anticipated that a Conformity Determination will be completed by the NY ICG in summer 2019.

The *2020-2024 TIP* is fiscally constrained, provides appropriate project descriptions for the public to understand the location and type of work to be conducted, and includes an environmental justice analysis, an air quality analysis, and New York State Energy Plan analysis. The financial plan of the *2020-2024 TIP* clearly demonstrates fiscal constraint.

In addition, GTC maintains an environmental justice database of approximately 190 groups representing populations not traditionally well-represented in the transportation planning process. These organizations were sent notification of public review and input opportunities during the development of the *2020-2024 TIP*. Likewise, GTC consulted with a number of partners responsible for land use management, natural resources, environmental protection, conservation, and historic preservation by providing direct notification of the opportunity to review and comment on *2020-2024 TIP*.

GTC has published the *Annual Listing of Federally Obligated Projects for Federal Fiscal Year (FFY) 2018*. This is the fourteenth consecutive year that GTC has published this document. The lists are fully compliant with all applicable requirements in Title 23 Part 450 and Title 49 Part 613 of the Code of Federal Regulations (the *Statewide and Nonmetropolitan Transportation Planning; Metropolitan Transportation Planning Final Rule)* effective June 27, 2016.

The adopted GTC TIP management procedures are in compliance with the definitions of "amendment" and "administrative modification" in the *Statewide and Nonmetropolitan Transportation Planning; Metropolitan Transportation Planning Final Rule*. In an effort to go beyond federal requirements and provide additional opportunities for public review, GTC has routinely posts a summary of proposed TIP amendments to be considered at each quarterly GTC Board meeting in advance of each meeting beginning. This action allows for a review by the public with opportunities to comment before final action is taken.

4. Technical Areas

Example technical emphasis areas include, but are not limited to, the following:

- TSMO and ITS Planning – GTC convenes and facilitates the Transportation Operations Coordinating Committee, which includes representatives from regional transportation and law enforcement agencies, as well as local elected officials, that meets bi-monthly to discuss how TSMO activities and related deployment of ITS elements can improve safety and efficiency for the travelling public and freight. In addition, GTC is the lead agency and project manager for the Genesee-Finger Lakes Regional TSMO Strategic Plan that was published in early 2019. GTC staff also maintains the Regional ITS Architecture.

- Bicycle and Pedestrian Program – GTC adopted the Genesee-Finger Lakes Regional Trails Initiative (RTI) Update on March 10, 2016. GTC staff conducted this project to update the Regional Trails Initiative Phases I and II to reflect changes in completed and proposed trail development, funding sources, and design guidance, as well as provide a gap analysis of the existing trail network and a review of maintenance policies. Phase I focused on the Metropolitan Planning Area and was completed in 2002 while Phase II focused on the remainder of the region and was completed in 2004. The plan identifies trails previously from earlier phases that should be removed from the plan as well as trail segments for near-term, mid-term, and long-term implementation. Since adoption of the RTI Update, GTC has worked with communities throughout the region on specific plans to identify ways to make non-motorized travel more convenient and attractive to residents and visitors.

  In 2018, GTC staff engaged a consultant to undertake Vulnerable Users Safety Assessment Program to conduct an analysis of crashes involving vulnerable users (e.g., bicyclists, pedestrians, and motorcyclists, horse/buggy) for ten locations using Roadway Safety Assessments (RSA). Since crash rates are difficult to establish for non-motorized modes, the project team endeavored to identify areas with systemic risk factors for further investigation. Once areas of interest were identified, ten locations were selected for a structured RSA. The RSA teams for each location were multi-disciplinary and included local official and stakeholders. All field work was completed in 2018 and location-specific reports are anticipated in summer 2019.

  In addition, GTC works with the Rochester Bicycling Club, Rochester Cycling Alliance, and other bicycle and pedestrian groups to ensure the accessibility of the transportation system for non-motorized users.

- Regional Travel Demand Modeling – GTC maintains and updates its regional travel demand model to provide estimates of current and projections of future traffic volumes, speeds, and volume to capacity ratios for planning and design studies in the Rochester Metropolitan Planning Area.
- Community Transportation Planning – GTC provides funding and technical assistance through the UPWP for communities throughout the region to conduct coordinated transportation and land use planning that improves the transportation system's contribution to livability and sustainability.

5. Special Considerations

   a. Title VI – GTC maintains an Environmental Justice (EJ)/Title VI/Limited English Proficiency (LEP)/American with Disabilities Act (ADA) database of approximately 190 groups representing populations not traditionally well-represented in the transportation planning process. These organizations are sent notification of public input opportunities for the LRTP and TIP, and informed of opportunities to participate in other GTC planning activities and initiatives as appropriate.

GTC has analyzed and conducted assessments of low-income, minority, and Limited English Proficiency (LEP) populations based on Census data for its own transportation planning process as well as those of RGRTA. The data is available in tabular and Geographic Information Systems format and is provided upon request to any agency or organization in the region.

In March of 2018, GTC staff added a Program Manager for Community Outreach. This person's primary responsibility is to engage stakeholders and keep them informed of GTC activities and opportunities. As part of a planned update of the current Public Participation Plan, GTC will begin the process of developing a plan to identify opportunities to more fully incorporate EJ/Title VI/LEP/ADA into its transportation planning process.

i. GTC conducts a geographic proximity and impact analysis of the TIP to determine how the locations of projects correlate to the location of minority, low-income, and LEP populations in the region. Projects are then evaluated as to the likely benefits and impacts on these populations in the region. Projects are evaluated based on their effects on accessibility, mobility, congestion, safety, and recreational opportunities for these populations.

   The DRAFT *2020-2024 TIP* states that "[t]he results of the analysis suggest that both the minority, low-income, and LEP populations in the region should receive equitable shares of the benefits arising from the transportation projects in the TIP while not being subjected to inequitable shares of any of the burdens." **[Note, this statement will be updated when the TIP is finalized]**

ii. GTC staff conducted an analysis of LEP individuals and identified Spanish speakers as the only population of significant size. Various commitment have been translated into Spanish and we have identified translation service to use as needed and upon request. While not traditionally considered an LEP population, the Rochester area has a large number of deaf and hard-of-hearing residents that communicate with American Sign Language (ASL). GTC has identified an organization through which we can hire qualified ASL interpreters for meetings as needed.

iii. GTC staff make a concerted effort to provide documents in alternative formats via the GTC website to facilitate access to disabled citizens. The GTC website is compliant with Section 508 of the Rehabilitation Act of 1973. It is anticipated that the *2020-2024 TIP* will be online only, making it compatible with screen readers and other accessibility features. GTC will make the information available in other formats, as needed and upon request. All GTC sponsored meetings are held in accessible locations and well served by public transportation. All GTC media releases for public meetings provide guidance on how citizens can request special accommodation to more easily participate.

GTC, in partnership with FHWA and NYSDOT hosted a workshop on September 27, 2016 to provide training to local public agencies on the Americans with Disabilities Act, and the required development of Transition Plans by agencies that own, or are responsible for, the public rights-of-way. This one day training was designed to ensure that pedestrian facilities and access routes are properly constructed and maintained for all individuals, including those with disabilities. It focused on the proper design and maintenance of pedestrian access routes in new construction or when existing facilities are altered. Participants were engaged through presentations, videos, discussion, and a hands-on outdoor exercise. This training provided information and best practices for those involved in the design and maintenance of pedestrian facilities, and for those individuals that ensure the proper adherence to all applicable laws and guidelines.

This course was taught from the perspective of the Public Rights-of-Way Accessibility Guidelines (PROWAG), a best practice for public rights of way, by instructors from FHWA.

iv. Semi-Annual Disadvantaged Business Enterprises (DBE) reports are submitted to NYSDOT as requested on-time and in the specified format. GTC follows all applicable host agency requirements with respect to DBE consideration in the procurement of professional services.

b. Private Operators – A mailing list of private and not-for-profit operators is maintained and said operators are included as appropriate on study advisory committees, including the *2016 Addendum to the Genesee-Finger Lakes Region Coordinated Public Transit-Human Services Transportation Plan* which was accepted by the GTC Board on March 10, 2016. GTC maintains relationships with private and not-for-profit operators through the FTA Section 5310 program.

c. Planning Factors – The ten planning factors of the FAST Act were instrumental in the development of the Goals and Objectives of the current LRTP which include stand-alone goals and associated objectives for safety and security. Collectively, the Goals and Objectives of the *LRTP 2040* guide the transportation planning process, including UPWP and TIP development and management.

d. Congestion Management Process – A comprehensive Congestion Management Process (CMP) was developed based on the work completed for the former Congestion Management System Update. The CMP was wholly incorporated into the *LRTP 2040*. Improved CMP parameters and output will be more fully utilized for TIP and UPWP project identification and prioritization, as well as for identifying and addressing broader transportation system performance issues.

GTC has implemented the Travel Time Data Collection Program to provide real-world speed data to identify congested links and improve performance measurement and accountability, as well as enhance the output of its regional travel demand model. In addition, GTC has established the Greater Rochester Regional Commuter Choice Program (ROCEASYRIDE), a cost-effective program that provides the traveling public with the maximum opportunity to save money and reduce pollution by accessing commuting options other than the single-occupancy vehicle, which has the potential to reduce the limited excess delay that the region experiences. Effective in June 2019, ROCEASYRIDE will be powered by 511NY. This change will offer users a more robust platform with information on more transportation options as well as access to information on transportation options in other areas of New York State.

The FY 2019-2020 UPWP includes Task 5902 – I-490 Integrated Corridor Management (ICM) Plan which is intended to guide future investments in ITS and operations strategies aimed at improving safety, minimizing delay, and enhancing the overall efficiency of traffic operations in the corridor for all modes of transportation. I-490 is the most heavily travelled corridor in the region.

e. Public Participation Plan – The *GTC Public Participation Plan* was adopted on December 13, 2007. This was an update to the previous *GTC Public Participation Policy* adopted in March 2004 and goes above and beyond the requirements of SAFETEA-LU. The *GTC Public Participation Plan* continues to advance GTC's commitment to full participation by all segments of the community. GTC staff has begun efforts to update the Plan in recognition of newer tools and techniques to engage the public.

   The *GTC Public Participation Plan* establishes minimum standards for the development and execution of programs and activities undertaken by or on behalf of GTC to ensure the public has meaningful opportunities to participate in the metropolitan transportation planning process. The *GTC Public Participation Plan* also establishes performance standards for the location of meetings and accommodation of persons with disabilities for all activities conducted by or on behalf of GTC.

   In addition, GTC maintains an EJ/Title VI/LEP/ADA database of approximately 190 groups representing populations not traditionally well-represented in the transportation planning process. These organizations are sent notification of public review and input opportunities during the development of the LRTP, TIP, and other planning activities as appropriate.

   GTC uses visualization via graphics (maps, tables, charts, etc.) in the LRTP, TIP, and UPWP to convey information. GTC makes a significant amount of information available through its website. To the extent practicable, this information is offered in formats that facilitate access by persons with disabilities. The GTC website has been overhauled to provide more

information and make it easier to use. The current website is compliant with Section 508 of the Rehabilitation Act of 1973.

A review of current practices indicates that users of pedestrian walkways, bicycle transportation facilities, and the disabled are offered meaningful opportunities to participate in the regional transportation planning process.

f. Coordinated Public Transit-Human Services Transportation Plan – the *2016 Addendum to the Genesee-Finger Lakes Region Coordinated Public Transit-Human Services Transportation Plan* which was accepted by the GTC Board on March 10, 2016. GTC staff conducted this project to update the Genesee-Finger Lakes Region Coordinated Public Transit-Human Services Transportation Plan adopted in 2011 to enhance mobility and access, minimize duplication of services, and provide cost-effective transportation for seniors, persons with disabilities, and low-income individuals.

C. Administrative/Management

1. Progress Reports

Submitted on time; comprehensively cover program.

2. Bills

Submitted on time; payment has been prompt.

3. Audits

Completed annually as part of the host agency corporate audit. Effort is made to ensure proper documentation and reporting of all accruals in a timely manner.

4. Annual Program

GTC closed out the Annual Program on time.

5. Budget

Up-to-date and continuously monitored. GTC staff have developed tools to track task budgets by UPWP Task and funding source from initiation to close out. Additionally, GTC staff uses a multi-year equipment budget to better anticipate and plan for expenditures related to office equipment/technology to minimize variation between annual budgets.

6. Consultant Selection

GTC is fully compliant with the host agency procurement process. Letters of Agreement have been developed for occasions where member agencies and others use UPWP funds for consultant services, though contract are now primarily held by GTC to minimize risk of non-compliance with the procurement process. Templates of various components of the procurement process (e.g., RFP, RFQ, contract, reporting forms, etc.) have been developed to ensure consistency and compliance. GTC encourages the use of DBE sub-consultants and requires documentation from prime

consultants of efforts to engage such firms. Of course, DBE firms are welcome as prime consultants too.

7. Central Staff/Host Agency Relations

GTC has attracted highly capable staff to address responsibilities within the UPWP; staff operates as a supportive team working in a cooperative, comprehensive, and continuous fashion with all member agencies. The Host agency is responsive to the administrative needs of GTC as identified in the host agency agreement.

The Host agency has been instrumental in recent recruitment efforts for the newly established position of Program Manager for Community Engagement and a vacancy in the Program Manager for Active Transportation position.

8. Decision Making

Committee structure works well. Comprehensive information is provided to Committee members via email, postal service, or courier (as appropriate) in advance of meetings. Technical review is conducted by appropriate ad-hoc committees and the Planning Committee which provides clear recommendations to the GTC Board. There is active participation in the Committee process by both urban and rural members. GTC Planning Committee meeting locations alternate around the region to encourage maximum involvement.

9. Governance

All plans and agreements are current. GTC prides itself on its ability to keep good sound relationships with its member agencies and Host Agency.

10. Procurement

GTC has established procedures to ensure procurements are in compliance with FTA Circular Guidance 4220.1F, Third Party Contracting Requirements. A written history of all FTA related procurements. Clauses and certifications for eligible FTA assistance program funding are included in all contracts for professional services. At this time, only studies led by GTC staff or the Rochester Genesee Regional Transportation Authority (RGRTA), the public transit operator for the region, use FTA Metropolitan Planning Funds. As a direct recipient of FTA funding, RGRTA is well versed in FTA procurement requirements. As the Host agency for GTC, RGRTA's procurement policies were already significantly in line with FTA requirements. GTC established procedures to ensure the involvement of the NYSDOT MPO Bureau to obtain the necessary approvals to advance procurements.