



March 12, 2025

To: House Committee on Transportation  
Senate Committee on Transportation

CC: Ross MacDonald, Public Transit Program Manager, VTrans

From: Clayton Clark, General Manager

A handwritten signature in blue ink, appearing to read 'Clayton Clark', is written over the printed name.

Regarding: Amendment to Title 24 Appendix Chapter 801

As discussed, transferring Green Mountain Transit's (GMT) rural service to other providers will require amendments to Title 24 Appendix Chapter 801. Legislative recommendations were included in our Final Legislative Report.

As of the date of this letter, neither Tri Valley Transit (TVT) nor Rural Community Transportation (RCT) has agreed to accept GMT's rural service. With that in mind, we recommend only partially implementing the legislative changes suggested in the report to ensure we stay in statutory compliance, maintain rural representation on our Board of Commissioners during the transfer process, and don't impede future operations if the transfer does not happen.

### **Statutory Amendments that Work Now**

GMT would support the following amendments to Chapter 801 in the FY26 Transportation Bill, as these amendments to the statute can occur now and would be an improvement over existing language. These changes will keep transfer discussions moving without creating future issues if a full transfer doesn't occur:



## **§ 2. Area of operation**

GMT supports amending this section now or in 2026. GMT believes that with the exception of local, fixed route urban service, our areas of operation should be determined only by the existing public transit state grant process managed by VTrans. GMT would also use the VTrans grant process in the future if we wanted to provide demand response service within Chittenden County.

GMT concurs with Legislative Council that the language submitted by VTrans and Steadman Hill would lead to GMT's statutory noncompliance during the transition process or if the transition is halted, even partially.

Regarding commuter service, GMT has transferred commuter service to other providers in the past with good outcomes. We do not recommend a statutory requirement for GMT to automatically be the provider of choice for commuter service. We believe VTrans should award funding through the state grant making process to the provider who can best deliver services.

Regarding the cyclical nature of transit, GMT recommends this portion of statute be amended to allow us to return to rural service in the future if, in the determination of VTrans, that is appropriate.

Considering the above, we recommend:

The area of operation shall be Chittenden County for fixed route bus service. Green Mountain Transit may operate service outside Chittenden County, or demand response transit within Chittenden County, as determined by the Agency of Transportation's public transit grant process.

This language addresses the timing concerns discussed yesterday and will be equally effective whether service is transferred or not.



## **§ 10. Implementation**

Green Mountain Transit supports deletion of § 10 (C) now or in 2026. This initial implementation language is no longer necessary and confusing.

## **Statutory Amendments to Pause for Now**

Green Mountain Transit does not support the following amendments in the FY26 Transportation Bill to Chapter 801 as proposed at this time. These sections should not be amended until TVT and/or RCT have agreed to accept the service, for the following reasons:

### **§ 11. Assessments of new members outside Chittenden County**

This section lays out how GMT would welcome members outside of Chittenden County. This language should not be repealed until it is certain GMT will no longer operate rural service.

### **§ 12. Municipalities authorized to vote for membership in the Green Mountain Transit Authority**

This section lays out which municipalities would be welcome to join GMT, to include within Chittenden County. This section is also referenced in §3 establishing membership. This language should not be repealed until it is certain GMT will no longer operate rural service and a new pathway is created in statute for Chittenden County municipalities to join.

### **§ 13. Other representation**

This section establishes GMT's rural commissioners. Removing this language would result in GMT reverting back to an urban only Board of Commissioners with no rural commissioners to advocate for our rural communities while rural transfer is still under consideration. This language should not be repealed until it is certain GMT will no longer operate rural service and should have an effective date that coincides with the service transfer date.



## **Timing Apology**

We apologize that this input is coming after the House Transportation Committee's initial draft of the FY26 Transportation Bill. We did not provide this information sooner since we believed there would not be statutory changes until TVT or RCT had agreed to accept a transfer.

## **Anticipate Charter Amendments in 2026 for Urban Operations**

Separate but related, as described in testimony, GMT will be partnering with the Chittenden County Regional Planning Commission (CCRPC) to work with our members on new assessment and special assessment practices. We anticipate this process will lead to recommended amendments to §7 of this chapter, especially in regard to special assessments to respond to financial crises, prior to the start of the 2026 session. We would expect to have other recommendations for improvements to the statute at that time. We want to make sure the Transportation Committees have the appetite to make statutory changes two years in a row.

## **Testimony Questions and Answers**

Q. Does municipal status impact STIC factors?

A. No.

Q. Does municipal status impact operations?

A. Yes. But mostly indirectly.

GMT is subject to all the same legal requirements of other government entities operating in Vermont. This includes but is not limited to government transparency requirements (open meeting laws, Freedom of Information Requests, etc.) and enhanced employee protections making discipline more difficult. As heard during testimony from VTrans, this does give us assessment authority and bonding ability (which we have not used and is likely another area we'd want to see statutory changes in 2026).



Long term, GMT's government status has contributed to a major, ongoing problem... leadership turnover. The Steadman Hill organizational assessment for GMT identified that poor quality leadership and leadership turnover was a major contributing factor to GMT's decline since the departure of Chris Cole in 2011.

Just like secretaries and commissioners working within state government make considerably less than comparable leaders in the non-profit sector, the GMT General Manager makes considerably less than the executive directors of the non-profit transit providers (or at least the providers studied for the rural transfer).

Not to be self-denigrating, but I am the perfect example of the problem. After two nationwide searches for a general manager, the best candidate to lead GMT was a person with no transit background but with generalized government management experience in Vermont. Long term this may work out, but GMT would likely have navigated the past two years differently had an experienced transit leader been recruited, especially if that transit leader already had experience in Vermont. There would be no incentive for an existing transit leader within Vermont to step up to manage a larger, more complex organization, as to do so would require a steep pay cut.

Please note: I am not seeking a pay raise. Increasing executive pay during a time of service reductions and potential layoffs is not an option for a government entity. The inability to recruit top talent to lead GMT will continue to be an issue, however, and should be addressed when I eventually depart the organization. By that time GMT's affiliated non profit organization should be well established with its own funding streams and could potentially contribute to improving the competitiveness of executive pay.