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TRANSPORTATION
ASSOCIATION

August 26, 2016

Docket Management Facility
U.S. Department of Transportation
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Washington, DC 20590

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Richard A. White

RE: FHWA-2016-0016

Dear Docket Clerk:

On behalf of the more than 1,500 member organizations of the American Public Transportation Association (APTA), I write to provide comments on the Federal Highway Administration (FHWA) Supplemental advance notice of proposed rulemaking (NPRM) and request for comments on its Metropolitan Planning Organization Coordination and Planning Area Reform, published on June 27, 2016 at 81 FR 41473.

About APTA

APTA is a non-profit international trade association of more than 1,500 public and private member organizations, including public transit systems; high-speed intercity passenger rail agencies; planning, design, construction and finance firms; product and service providers; academic institutions; and state associations and departments of transportation.

General Comments

We support FTA/FHWA's intent to simplify and instill greater coordination in the regional planning process. We believe, however, that the current proposal would be counterproductive to that aim and could slow approvals for project development and the overall planning process. We note that there is no legislative requirement demanding the proposed consolidation. Moreover, this proposal does not reinstate any requirement, instead establishing a new, untested standard for the MPO process. The proposal should be abandoned or greatly modified to foster already existing coordination between MPOs.

Consolidation would compromise transit voices

Consolidation of MPOs would threaten the public transportation voices in areas formerly served by smaller MPOs. Expanding the operational areas of the MPOs would expand the number of transit agencies operating in the larger areas while potentially slashing their collective voting power. Should FTA/FHWA conclude consolidation is

required, they should – at a minimum – dictate a requirement that public transportation representation not be lessened in these larger organizations.

Coordination exists but can be increased on MPO criteria for the programming and scheduling of grant funding

FTA/FHWA cite to no instance of existing coordination problems, even in the most complex areas. Coordination is already encouraged and can mostly be enhanced by simply highlighting the need for coordination, particularly where multiple MPOs fund a single public transportation agency or other recipient. That highlight can be included in existing guidance and practices without complicating the MPO process with the proposed additional requirements.

For agencies that operate across multiple MPOs, however, planning for effective service that provides for the needs of communities in their service areas becomes difficult when these MPOs operate on different timeframes, criteria, and schedules for long-range planning and grant distribution. We ask FHWA/FTA to consider stipulating that MPOs coordinate on the criteria for programming and scheduling of grant funding, especially those related to CMAQ, STP, and others, along with the criteria for including projects or initiatives in long-range plans. Such a requirement would increase transit agencies' capacity to develop unified service plans and plan for major capital investments.

The proposal would complicate performance management development

FTA/FHWA and their grantees are already facing a daunting task in initiating, operationalizing, and harmonizing performance management practices among various transportation modes. The overlay of consolidated MPOs threatens to stall that process.

We appreciate the opportunity to assist FHWA in this important endeavor. For additional information, please contact James LaRusch, APTA's chief counsel and vice president corporate affairs, at (202) 496-4808 or jlarsch@apta.com.

Sincerely yours,



Richard A. White
Acting President & CEO

RAW/jpl:jr