



August 29, 2012

The Honorable Ray LaHood  
Secretary  
US Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Secretary LaHood,

As part of the Association of Metropolitan Planning Organizations' (AMPO) on-going analysis of MAP-21, please find the provided recommendations on two provisions: Transportation Alternatives and MPO Structure. AMPO created two working groups to analyze Section 1122 - Transportation Alternatives (TA), and Section 1202 - Metropolitan Transportation Planning. The specific amendment in Section 1202 is to Section 134(d)(2) 23USC.

**Transportation Alternatives:**

AMPO supports the establishment of suballocation for the TA program and welcomes the opportunity for our members to operate a competitive application process by awarding eligible entities funds for projects. Requiring decision-making at the local and regional levels will ensure that the unique needs of the communities MPOs serve are addressed. MPOs possess the necessary skills and technical capacity to operate this program as evidenced by our many members who currently operate similar processes under both FTA (JARC & New Freedom) and FHWA (CMAQ & STP) programs. We recommend that USDOT consider existing best practices from those MPOs operating similar programs.

AMPO's working group discussed some potential challenges and the need for implementation guidance under the TA program. For instance, if there are no eligible entities in a particular region such as a rural area, how will the state use the funds? Despite an area's need for TA projects, if there is no eligible entity, it appears that the state DOT may reallocate funds for non-TA projects. AMPO supports the implementation of the TA program that ensures TA funding is utilized only for TA projects.

**MPO Structure:**

MAP-21 amends the structure of MPOs, specifically, to include representation of public transportation providers. The law provides a two-year period for MPOs to meet

the requirement without requiring a redesignation of the MPO. Public transportation providers are important partners in developing transportation plans and investments. AMPO supports transit agency representatives in the governing structure of MPOs. To satisfy this requirement and to reflect the wide variation of transit systems and local and state government structures across the country, AMPO recommends that MPOs retain existing decision-making authority while providing transit a seat at the table as a planning partner.

AMPO stands ready to assist in providing any information that might be helpful in developing guidance for these programs. Thank you for considering our comments and recommendations. My contact information is 202-624-3684 and [dhardy@ampo.org](mailto:dhardy@ampo.org). We look forward to working with USDOT.

Sincerely,

A handwritten signature in black ink that reads "DHardy". The signature is written in a cursive, flowing style.

DeLania Hardy  
Executive Director  
Association of Metropolitan Planning Organizations