



August 29, 2012

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

Dear Secretary LaHood,

As you prepare to move forward with the implementation of MAP-21, the Association of Metropolitan Planning Organizations (AMPO) would like to provide you with early input regarding the provisions establishing performance-based planning. AMPO's performance measures working group drafted position papers and have held numerous meetings developing what our members believe are appropriate approaches to establish and implement performance targets and measures.

MPOs' use of performance targets and measures is a long-standing practice. We recommend that the rule recognize current practice in performance-based planning. The working group recently conducted a conference call discussing the new law's provisions. The following list reflects our preliminary observations:

- ***A federal approach to setting performance measures must not be prescriptive. AMPO recommends that the measures and targets not be overly prescriptive but instead allow for selection in a manner that is responsive to statewide and regional priorities, recognizing that the measures must address the articulated national policy goals and be coordinated with states and providers of public transportation to ensure consistency. Measures should be defined broadly at the national level, and then refined at the state and local levels.***
- ***"Don't reinvent the wheel." MPOs have existing procedures for some measures and targets, particularly when the conformity process is required. Existing methods should be incorporated into the new process when applicable.***
- ***State targets should account for the differences between urban and rural areas. Variations occur among different urban areas. A prescriptive approach for all urban areas in one state may not work.***
- ***Certain measures and targets are not in the purview of the MPO and, to a significant degree, are the state DOTs' and transit operators' jurisdictions. The rule should clearly state how state goals, objectives, performance measures, and targets should be integrated into the metropolitan planning process.***

- ***The amount of MPO involvement in the target setting process hinges upon how USDOT interprets “in coordination.” MPOs best understand the nuances of their regions and can be valuable partners in the target setting process.***

AMPO is continuing to collect input from our membership. We look forward to working with the USDOT, the states, and other stakeholders during the rulemaking process. My contact information is 202-624-3684 and [dhardy@ampo.org](mailto:dhardy@ampo.org). Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "D Hardy". The signature is fluid and cursive, with the first letter "D" being large and prominent.

DeLania Hardy  
Executive Director  
Association of Metropolitan Planning Organizations