



July 7, 2016

Gregory G. Nadeau
Administrator
Federal Highway Administration
United States Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

Carolyn Flowers
Acting Administrator
Federal Transit Administration
United States Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Extension of Commenting Period for Docket No. FHWA-2016-0016

Dear Administrator Nadeau and Acting Administrator Flowers:

The National Association of Regional Councils (NARC), the Association of Metropolitan Planning Organizations (AMPO), and the National Association of Development Organizations (NADO) are requesting that the US Department of Transportation (USDOT) extend the comment period for the Metropolitan Planning Organization Coordination and Planning Area Reform Proposed Rule (Docket Number FHWA-2016-0016) until October 26, 2016 (60 days beyond the 60 days provided in the docket). Compliance with this proposed rule would present a major challenge for our members, as it has far-reaching and complex implications for many of the nation's MPOs. This extension request is necessary to give the nation's Metropolitan Planning Organizations (MPOs) adequate time to prepare their responses to this proposal.

As you are aware, MPOs are comprised of professional staffs, local elected officials, and state and other appointed representatives. Often, these organizations meet only monthly, making a 60-day comment period insufficient. A 120-day comment period will better allow MPOs to properly brief relevant officials on the proposed rule, allow them time to consider the impacts in full, and integrate their valuable and essential insight into thorough comments to the docket.

NARC, AMPO, and NADO collectively represent the nation's more than 400 MPOs; as a result, all three organizations represent MPOs that would be impacted by the notice of proposed rulemaking (NPRM). After initial discussions with the members that are directly impacted by the NPRM and those that may be impacted in the future, it is apparent that this NPRM will require extensive consideration by each of the estimated 142 affected MPOs to gain a full understanding of what this means for their organization. Given the extensive political and practical

considerations that underlie MPO decision-making – especially considerations as significant as whether to merge with an adjacent MPO or MPOs –the extra time we are requesting to fully consider the impact of this NPRM is warranted.

There are three reasons for our request. First, this is a highly consequential rulemaking that would be transformative for the estimated 142 effected MPOs, which, in most cases, would either merge with adjacent MPOs or be required to produce unified planning documents. In either event, this would be a very different reality for these organizations compared to the status quo. Second, there are a significant number of appointed and local elected officials associated with the directly affected MPOs; all must be briefed on this proposal and allowed time to consider its impacts and each organization then must jointly conclude how to respond. This will take time, and the request for a longer comment period will accommodate this need. Finally, many of the same staff that will prepare comments in response to this NPRM are also coordinating response to the third, and most complex, of the rules governing implementation of performance measures. Comments on that NPRM are due just six days before those for the MPO Coordination NPRM, and asking for comments on both NPRMs in such a tight timeframe should be avoided.

We appreciate your consideration of this request, and we look forward to working with USDOT to provide substantive and helpful input on this NPRM. If you have any questions or would like to discuss this matter further, please contact Erich Zimmermann, NARC’s Transportation Director, at (202) 618-5697 or erich@narc.org; DeLania Hardy, AMPO’s Executive Director at (202) 624-3680 or dhardy@ampo.org; or Susan Howard, NADOs Director of Government Relations and Legislative Affairs, at (202) 624-8590 or showard@nado.org.

Sincerely,



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Executive Director
Association of Metropolitan
Planning Organizations



Joe McKinney
Executive Director
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Leslie Wollack
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