



December 31, 2013
Via Electronic Docket

U.S. Department of Transportation
1200 New Jersey Avenue, Southeast
West Building Room W12-140
Washington, D.C. 20590-0001

Federal Transit Administration

RE: Advanced Notice of Proposed Rulemaking for the National Public Transportation Safety Plan, the Public Transportation Agency Safety Plan, and the Public Transportation Safety Certification Training Program; Transit Asset Management – Docket No. FTA-2013-0030

I. Introduction

The Association of Metropolitan Planning Organizations (AMPO) submits these comments in response to the Federal Transit Administration *Advanced Notice of Proposed Rulemaking (ANPRM), Docket Number FTA-2013-0030 (October 3, 2013), regarding the National Public Transportation Safety Plan, the Public Transportation Agency Safety Plan, the Public Transportation Safety Certification Training Program; Transit Asset Management authorized by the Moving Ahead for Progress in the 21st Century (MAP-21)*. As a national association representing the interests of federally established metropolitan planning organizations (MPOs), AMPO appreciates the opportunity to provide comments.

II. Overarching Comments on the Advanced Notice of Proposed Rulemaking

AMPO would like to provide the following overarching comments regarding the ANPRM:

- We respectfully request that future rulemakings be made compatible with other performance based rulemakings from MAP-21.
- With several upcoming rulemakings regarding asset management plans and safety plans requiring implementation investment plans, AMPO requests that consideration and reconciliation of these various plans into the MPO process be resolved in the upcoming Joint Metropolitan and Statewide Planning Rulemaking.
- Future regulations may produce voluminous data and plans from multiple transit providers in any particular metropolitan region. We request that FTA strive to avoid an immense new record-keeping burden.
- No two metropolitan regions or transit providers are alike. AMPO stresses the need for flexibility to meet different situations and sizes of providers and agencies.
- AMPO requests that the future regulations provide a framework that works for all modes and sizes of transit providers, and that FTA is cognizant of contract operations of transit.
- AMPO agrees that “coordination to the maximum extent practicable” should also extend in both directions; with the transit systems coordinating their own SGR performance targets with the regional SGR performance targets established by the MPO. This coordination will further enhance the goal of having “Transit at the Table.”

III. Responses to Specific Questions in the ANPRM

AMPO would like to offer comments on specific questions posed in the ANPRM by designated question number below:

116. What procedures or requirements should FTA establish to ensure that Transit Agency Safety Plan and TAM Plan goals, measures, and targets from individual transit systems are integrated into the metropolitan transportation planning process?

AMPO Response: AMPO recommends that the MPO Certification process is the proper venue to ensure TAM and Safety programs are incorporated at the MPO level (not on a project or grant by grant basis).

117. Should MPO's be required to set a region-wide target for transit state of good repair, or should MPO's be required to incorporate the both safety and transit state of good repair targets from each transit system within their jurisdiction into the performance-based planning process, or should have MPO's have discretion to choose between these two approaches?

AMPO Response: AMPO believes that MPOs and transit providers should work cooperatively on setting goals and targets at both the provider level and through the Metropolitan Planning Process. AMPO believes if these goals and targets are developed cooperatively, that MPOs may incorporate the transit providers' goals and targets "by reference" into Transportation Improvement Programs. The associated investment plans to meet the targets must be fiscally constrained. Similarly, Long Range Transportation Plans developed through the Metropolitan Planning Process are required to be fiscally constrained and have no less than a 20-year planning horizon by regulation. AMPO suggests that the Joint Metropolitan and Statewide Planning Rule reconcile the potential incorporation of Transit Asset Management plans with other MAP-21 required Asset Management plans into Long Range Transportation Plans.

119. Should FTA establish procedures or requirements to ensure that Transit Agency Safety Plan and TAM Plan goals, measures, and targets from individual transit systems are integrated into other metropolitan planning products, such as the Unified Planning Work Program (UPWP) and Congestion Management Process (CMP)?

AMPO Response: AMPO does not believe that the Unified Planning Work Program (UPWP) and Congestion Management Process (CMP) are the appropriate planning documents for incorporation of Transit Agency Safety Plan and TAM Plan goals, measures, and targets.

120. FTA is interested in hearing recipient and stakeholder perspectives on how the investment priorities set forth can be most-effectively reflected in the prioritization of projects, strategies, and resources—including Federal, state, and local funds—in MPO Plans and Transportation Improvement Programs, as well as the Long-Range Transportation Plans of States and Statewide Transportation Improvement Programs. Specifically, how should transit state of good repair needs identified in be addressed alongside other investment goals in these financially-constrained plans?

AMPO Response: AMPO strongly recommends that the Joint Metropolitan and Statewide Planning Rule is the proper vehicle to reconcile the potential incorporation and prioritization of Transit Asset Management and Transit Safety Plans with other MAP-21 required rulemaking into Metropolitan Planning Process and Document requirements.

121. How should safety targets be considered in the planning process by State's and MPOs? Should MPO's be required to set a region-wide safety target? Or, should MPO's be required to incorporate each of the safety targets from each transit system within their jurisdiction into the performance-based planning process? Or, should MPO's have discretion to choose between

these two approaches? How would each approach make the planning process easier or more difficult for transit agencies?

AMPO Response: AMPO believes that MPOs and transit providers should work cooperatively on setting goals and targets at both the provider level and through the Metropolitan Planning Process. AMPO believes that if these goals and targets are developed cooperatively, that MPOs could incorporate the transit provider goals and targets “by reference” into the Metropolitan Planning Process. AMPO suggests that the Joint Metropolitan and Statewide Planning Rule reconcile the potential incorporation of Transit Safety goals, targets and plans with other MAP-21 required rulemaking into Metropolitan Planning Process and Document requirements.

Conclusion

For half a century, metropolitan transportation planning has been rooted in a cooperative and collaborative relationship with our partners in the public transportation arena, as well as with other stakeholders of metropolitan areas. MPOs believe that the development of performance provisions to meet the regulations and spirit of MAP-21 can best be done in a collaborative fashion. AMPO firmly believes that the Joint Metropolitan and Statewide Planning Rule is the proper vehicle to reconcile the potential incorporation of Transit Asset Management and Transit Safety goals, targets and investment plans with other MAP-21 required rulemaking into Metropolitan Planning Process and Document requirements.

Thank you for the opportunity to provide our input and comments. We look forward to working with FTA and USDOT in implementing the performance provisions of MAP-21.

Should you have any questions or seek further input from AMPO on the information provided above, please contact me at (202) 624-3684 or at dhardy@ampo.org.

Respectfully submitted,



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