



February 22, 2013

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

Dear Secretary LaHood,

On behalf of the nation's regional planning organizations, metropolitan planning organizations (MPOs) and the local governments they represent, the National Association of Regional Councils (NARC) and the Association of Metropolitan Planning Organizations (AMPO) provide the below recommendations on provisions of P.L. 112-141, the Moving Ahead for Progress in the 21st Century Act (MAP-21), specifically Title 23, §134(d)(2)(b), which requires representation of major modes of public transportation on the Boards of MPOs that serve Transportation Management Areas (TMAs). As you promulgate new regulation and guidance on this provision, we strongly urge that the U.S. Department of Transportation (U.S. DOT) afford MPO Boards maximum flexibility in appointing these representatives.

Transit providers may already serve on the Boards of their respective MPOs and through state law and/or local jurisdictional agreement this may take a variety of forms. Transit providers may be represented directly by local elected officials who sit on the governing boards of both the MPO and the transit provider.

- For example, the Southeastern Wisconsin Regional Planning Commission (SEWRPC) in the Milwaukee, WI region, like many MPOs, maintains a Board of Directors composed of a strong blend of local elected officials, gubernatorial appointments and shared appointments. In SEWRPC's case, there is already a strong connection between the Board of Directors and transit agencies. Six of SEWRPC's Board Members also represent one of the several transit agencies that exist in their region.

Additionally, elected officials on the MPO governing boards represent local jurisdictions that are often owners and/or operators or are part of the governing structure of a transit provider.

- For example, the membership of the Metropolitan Transportation Commission (MTC) in the San Francisco Bay area includes board members from 12 different public transit providers in the region. These dozen transit agencies are represented by elected officials who sit both on MTC and their local transit board. Three of MTC's commissioners each sit on two transit boards.

We appreciate the transit community's concerns on the need for greater coordination between all transportation modes. Several MPOs nationwide administer transit programs, and an even greater number conduct the transportation planning for transit systems, and we agree that MPOs should take into account the views of public transportation providers in planning and project selection decisions. These provisions were written broadly to allow for maximum flexibility in implementation. We request that U.S. DOT maintain the same intent when promulgating regulations or guidance. Granting maximum flexibility in identifying the type and quality of representation that determines a region's policy and funding priorities is crucial to ensuring that unintended consequences which could reduce the quality of transit representation that exists today are avoided to the maximum extent practicable.

We stand ready to assist in providing any information that might be helpful to your efforts. Please do not hesitate to contact Fred Abousleman, fred@narc.org / 202.986.1032 x216, or DeLania Hardy, dhardy@ampo.org / 202.624.3680, with any questions.

Thank you,

Fred Abousleman
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