



The Honorable Jim Inhofe
Chairman
Environment & Public Works Committee
Committee
205 Russell Senate Office Building
Washington, DC 20510

The Honorable Bill Shuster
Chairman
Transportation & Infrastructure
2268 Rayburn House Office
Building
Washington, DC 20515

The Honorable Barbara Boxer
Ranking Member
Environment & Public Works Committee
Committee
112 Hart Senate Office Building
Washington, DC 20510

The Honorable Peter DeFazio
Ranking Member
Transportation & Infrastructure
2134 Rayburn House Office
Building
Washington, DC 20515

Dear Chairmen Shuster and Inhofe and Ranking Members DeFazio and Boxer:

The Association of Metropolitan Planning Organizations (AMPO) would like to congratulate and thank you for successfully leading your committees in the passage of your respective surface transportation bills and through each chamber of Congress. AMPO strongly supports your dedication to moving these bills in to conference committee and negotiating the report that will set maximum transportation investment levels for an appropriate period of time that will lead to funding certainty and predictability for not only the planning community, but for the transportation industry as a whole.

In 2014, AMPO presented its reauthorization recommendations to Congress and subsequently worked with Congress to address several issues that directly affect metropolitan planning organizations. As you progress through the conference, we offer the following recommendations based on the two bills now in conference.

Funding and Duration of the Conference Report – First, we request the conference report be funded at the highest levels that are supported by receipts to the Highway Trust Fund (HTF) combined with the additional revenue that has been included in the two bills. With the additional revenue included in the STRR Act, we are hopeful that Congress can fund a five or six year bill at better than CBO baseline levels.

Planning Funds - Both bills increase the amount of funding available to MPOs to comply with the planning requirements under law and to help with the implementation of the pending MAP-21 performance management rules – *thank you*. We urge you to seek the highest level of planning funds that can be supported in the conference report in both the highway and transit titles.

STP/TAP/Bridges - In addition to the overall funding levels, AMPO supports increasing the amount of Surface Transportation Program funds sub-allocated by population to 55%, or higher, in the first year of the authorization and returning to the pre-MAP-21 level of 62.5%. AMPO strongly requests that the conference report not reduce the overall funding level of the STP program to fund off-NHS bridges before sub-allocating resources to MPOs – the actual dollar amounts should increase, not fall below current amounts. AMPO supports the additional funding eligibility under the National Highway Performance Program (NHPP) for non-NHS bridges on the

federal-aid highway system. With the increased funding levels, States will be able to continue to use STP funds apportioned to them for investments in off-system bridges.

The MPO community supported the establishment of the Transportation Alternatives Program (TAP), as well as directing those resources and decisions-making authority to MPOs and local governments. AMPO supports the 100% sub-allocation of TAP funds to local governments and supports increasing those amounts. We support reserving funds for TAP from apportioned programs but the reserved funds should not reduce amounts apportioned to States below current levels.

MPO Policy Board - AMPO thanks the committees for addressing the issue of representation within the MPO board structure. MAP-21 led to confusion regarding the role of public transportation operators within an MPO. All MPOs work with its transit partners. It is integral to the planning process and will continue to be. Federal law directs an MPO to consist of a number of officials, but it did not dictate the various roles and responsibilities of those officials. Until MAP-21, and the subsequent interpretation of the law, MPOs determined the roles and responsibilities. We are hopeful the amendments made under both the DRIVE Act and the STRR Act will resolve the on-going confusion. While both bills are nearly identical, AMPO believes the House version provides the flexibility for MPOs to determine the roles and structure of the policy board. We are particularly pleased that both bills specifically read that the designation or the selection of providers of public transportation shall be determined by the MPOs.

Congestion Management - Under MAP-21, Congress defined a process in 23 USC Section 150 to link the performance of the transportation system and how States and MPOs are to invest federal funds. USDOT continues to develop rules to implement these changes in law. AMPO fully supports performance-based planning. We believe that when the rules are final, MPOs will have a clearer path to managing congestion and other transportation challenges. With this in mind, AMPO supports the elimination of the Congestion Management Process as done in the DRIVE Act. We understand that should an MPO wish to continue this process, the action taken under the DRIVE Act would not preclude the activity. Further, AMPO does not see the need for an addition of a new Congestion Management Plan as is in the STRR Act. Under current law, MPOs are required to support national goals and may develop regional goals that address miles traveled and connection to employment centers. MPOs over 200,000 in population are required to consider connectivity of the system, projects and strategies to improve quality of life, and projects that support the economic vitality of the metropolitan area.

CMAQ - The Congestion Mitigation and Air Quality (CMAQ) is an important tool for States and MPOs. Funding under this program has benefited many communities and aided in improving the air quality in many urban areas – large and small. AMPO strongly believes that retaining the flexibility to invest in projects is important. It should not be limited to projects that reduce directly emitted fine particulate matter. We recommend retaining current law or including the word indirect in the amendments to 23USC 149(g)(3) as the STRR Act did. Additionally, we recommend that 23USC 149(k)(1) make clear that funding may be used on projects that reduce directly or indirectly emitted particulate matter.

Freight - AMPO commends both the House and Senate for targeting investments in freight mobility programs and projects. The impact of freight through urban and rural areas presents unique challenges for States and MPOs. Providing substantial resources toward moving freight through urban areas, and across the country, will help to address congestion, safety, and air quality. We support the designation of national freight routes and the ability to add miles to the system to support growing truck movement. We are pleased that the DRIVE Act includes the designation of critical urban freight corridors and the role that MPOs have in designating these corridors.

Public Transportation – Public Transportation – Finally, Federal funding for public transportation is very important to the majority of urban areas across the country. AMPO supports the increased funding in the DRIVE Act for Sections 5340(c) and (d) and the higher levels in the STRR Act for the 5339(d) competitive bus and bus facilities grant program. AMPO supports the DRIVE Acts continuation of apportionments to High Density States and requests the conference report to retain the program.

Please contact me at 202-624-3684 or dhardy@ampo.org, should other information be needed. Thank you again.

Respectfully,

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