



July 5, 2016

Gregory G. Nadeau  
Administrator, FHWA

and

Carolyn Flowers  
Acting Administrator, FTA

RE: Metropolitan Planning Organization Coordination and Planning Area Reform Notice of  
Proposed Rulemaking  
[Docket No. FHWA-2016-0016; FHWA RIN 2125-AF68; FTA RIN 2132-AB28]

Dear Administrator Nadeau and Acting Administrator Flowers:

On behalf of the members of the Association of Metropolitan Planning Organizations (AMPO) and the American Association of State Highway and Transportation Officials (AASHTO), we respectfully request that the comment period for the proposed rule regarding *Metropolitan Planning Organization Coordination and Planning Area Reform* be extended from 60 to at least 120 days. **Our organizations think that a 120-day review period is essential to have adequate time to review the proposed, far-reaching changes to the statewide and metropolitan transportation planning process.**

We strongly believe, and our members concur, that –

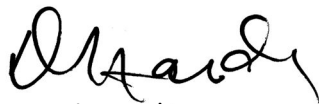
- The proposed coordination rule would make far-reaching changes to the planning processes, practices and common understandings that have been in effect since MPOs were first introduced in the Federal Highway Act of 1962 and in federal regulation since 1993.
- The proposed coordination rule could have substantial impacts on diverse MPO and State financial and human capital resource capacity and state and regional institutional and governance relationships. More than one-third of all the MPOs, two-thirds of the States and forty percent of the population in Urbanized Areas could be affected. The numbers could be greater depending on interpretations, and likely increase especially in areas experiencing high

or steady population growth and movement. As written the rule may impede rather than support progress on implementing performance-based planning and programming.

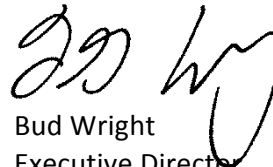
- The Department of Transportation's decision to release this proposed State and MPO coordination rule separately from the Final Statewide and Nonmetropolitan Transportation Planning; Metropolitan Transportation Planning Final Rule issued only one month ago on May 27, 2016 will delay implementation of the May 27<sup>th</sup> planning regulation in affected metropolitan regions.
- Review of the proposed coordination regulations will be more complex because it must be undertaken within the context of the just released final planning regulations, which the MPOs and States are now striving to understand and implement. Issues regarding coordination among multiple MPOs within single or contiguous urbanized areas should have been discussed as part of the broader dialogue on planning regulations to implement the seminal planning process reforms adopted with MAP 21 and affirmed with the FAST Act.
- On April 22, 2016 U.S. DOT issued the third and last set of proposed rules that establish performance measures for State DOTs and MPOs as required by MAP-21. This third in the series of performance measure rules outlines the proposed performance measures to be used by State DOTs and MPOs to assess the performance of the Interstate and non-Interstate NHS, to assess freight movements on the Interstate, and to assess traffic congestion and on-road mobile source emissions. This proposed rule, which is the most complicated of the three, has a comment period ending on August 20, 2016. The State DOTs and MPOs lack the capacity to dedicate the necessary resources to provide comments on the third performance measures rule, to implement the new planning regulations, *and* to review the proposed rule on planning coordination – all within the same time frame.

The U.S. Department of Transportation's decision to propose a new NPRM- separate and distinct from the just released final planning rule - itself contributes to a disjointed and uncoordinated approach, and is disappointing. We believe that the proposed coordination rule will have substantial implications for the statewide and metropolitan transportation planning process and the agencies charged with execution. We respectfully request that U.S. DOT extend the comment period for the proposed coordination rule from 60 days to at least 120 days.

Sincerely yours,



DeLania Hardy  
Executive Director  
AMPO



Bud Wright  
Executive Director  
AASHTO

Cc: Ms. Gloria Shepherd, FHWA  
Mr. Kenneth Petty, FHWA  
Ms. Lucy Garliauskas, FTA  
Ms. Sherry Riklin, FTA