



**Association for Commuter Transportation Comments on MPO Consolidation NPRM
Docket No. FHWA-2016-0016: FHWA RIN 2125-AF68; FTA RIN 2132-AB28.**

The Association for Commuter Transportation, representing agencies across the nation who work to provide commuters with options, writes in opposition of the proposed rule.

ACT respectfully requests that FTA and FHWA should scrap the proposed rule and look to take more incremental steps to increase coordination and transparency between and within planning organizations.

Below is our analysis of this rule:

It would radically alter the planning processes, practices and understandings that have been in effect for MPOs for decades. The proposed rule's call for merging MPOs or, at a minimum, requiring common long-range plans, Transportation Improvement Programs and performance targets would, in effect, create much larger planning areas. This risks watering down the voice of local elected officials in the regional planning process.

It also risks creating a situation where the very real and legitimate interests of many regions and its constituent subregions could be lost in the shuffle of a large "super-regional" planning entity.

This proposed rule does nothing to discuss integrating new stakeholders like TMAs, employers, or other entities into the planning process and as mentioned before, makes the planning process so 'big' that these stakeholders who are often already overwhelmed by the process will be further confused.

The proposed rule does little to clear up transparency and governance issues. It simply will involve more public bodies who will fight for their share of the pie rather than develop strategic planning documents.

It would potentially affect MPO governance, including long-standing procedures for development of the Long-Range Transportation Plan and Transportation Improvement Program, which, while are in need of improvement for many areas, continue to advance and improve.

This proposed rule was released only a month after the rule on metropolitan planning was finalized and at the same time as part III of the proposed performance measures for system performance and CMAQ. The content of the new proposed rule should have been part of the overall discussion on metropolitan planning and requires further discussion.

ACT believes in planning transparency and better coordination within and between planning bodies, however, this proposed rule falls short in delivering on either of those principles and would serve as a significant setback.