



October 21, 2016

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE.
Washington, DC 20590

Via US and Electronic Mail at www.regulations.gov

SUBJECT: DOCKET NO. FHWA-2016-0016
FHWA RIN 2125-AF68; FTA RIN 2132-AB28
NOTICE OF PROPOSED RULEMAKING; REOPEN FOR COMMENTS: METROPOLITAN
PLANNING ORGANIZATION COORDINATION AND PLANNING AREA REFORM

Dear Secretary Foxx:

Please accept the Southeast Florida Transportation Council's (SEFTC) response on behalf of the Miami Urbanized Area to the extended comment period for the FHWA and FTA Notice of Proposed Rulemaking.

On June 27, 2016, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) issued a Notice of Proposed Rule Making (NPRM) with a comment deadline of August 26, 2016 that proposed among other things for a single MPO to be designated for an urbanized area or Metropolitan Planning Area (MPA), unless the Governor and the MPOs determine that the MPA's size and complexity necessitate multiple MPOs. In such case, the NPRM would also require a single long range transportation plan, transportation improvement program, and performance measures for the continuous urbanized area. FHWA and FTA have reopened the comment period and established a new comment deadline of October 24, 2016 with a specific request for comments related to the impact of the proposed requirements for unified planning products where multiple MPOs serve the same urbanized area, potential exceptions that should be included in the final rule, criteria for applying such exceptions, and the expected costs of implementing the proposed rule.

The Miami Urbanized Area includes portions of Miami-Dade, Broward and Palm Beach Counties, each of which operates as an individual MPO pursuant to Florida Statutes. The proposed rule would create an undue burden on the general public from each County and detrimentally impact the local and regional transportation planning process. To facilitate regional planning, the three southeast Florida MPOs entered into a formal agreement creating the SEFTC in 2005 pursuant to Section 339.175, Florida Statutes. This agreement demonstrates collaboration at the local, regional, and state level, to advance regional transportation while also sustaining a critical balance and commitment to the local transportation planning process led by the individual MPOs.

Due to the extraordinary success of SEFTC, the United States Department of Transportation (USDOT) has identified SEFTC as a Model of Regional Cooperation. The proposed rule-making undermines the advancement of regional cooperation via SEFTC because it proposes to consolidate the Miami-Dade, Broward and Palm Beach MPOs into a single MPO, to serve an area over 6,000 square miles, with over 100 municipalities and a population of over 5.8 million people, disrupting the current framework that provides balance between regional and local transportation planning. SEFTC serves to coordinate the Regional Transportation Plan, the Regional Freight Plan, the Regional Greenways and Trails Plan and other regional efforts in the areas of modeling, performance measures, transportation system management and operations, local government training, climate change and adaptation planning, and public involvement.

The Southeast Florida Transportation Council submits the following specific comments to the USDOT:

A. Impact of the proposed requirements for unified planning products where multiple MPOs serve the same urbanized area:

Whether as a consolidated single MPO or as three MPOs creating unified planning products, the primary impact of the proposed rule is diminished local input/awareness in MPO planning decisions and the secondary impact is creation of logistical costs and issues. The participation and engagement of local officials and the general public will be greatly diminished by the considerable increased cost in time and travel that will be required to travel significantly longer distances in order to attend and participate in regional Public Hearings associated with the development and updates of unified planning products. Due to such large geographical areas, transit options may not be available, resulting in negative consequences of discouraging participation of the general public as well as the transportation disadvantaged population participation in the process. This undermines the current framework of SEFTC which currently provides a critical balance between the regional and local planning process.

B. Potential Exceptions:

Urbanized areas currently served by multiple MPOs where the MPOs have entered into a formal interlocal agreement to establish regional coordination, such as the Southeast Florida Transportation Council (SEFTC), should be exempt from the proposed rule to consolidate and/or to create unified planning products. SEFTC preserves the local planning structure of the individual MPOs along the South Florida region within a regional context, balancing the state, regional, and local perspectives in the transportation planning decision-making process.

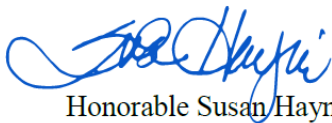
SEFTC's current framework represents the local, regional, and state desire and commitment to effectively collaborate on matters of regional significance, ensuring that the strength of the region's voice is maintained on a national scale, but that local input is also protected in the MPO planning process. The Miami-Dade, Broward and Palm Beach MPOs reaffirm their support of SEFTC as grounds for exemption and as a model for regional cooperation for other urbanized areas that wish to be served by multiple MPOs.

C. Expected Costs:

Although there may be some cost-saving efficiencies in certain areas, the overall impact is increased staffing and administration costs due to a region that spans over 6,000 square miles. It is estimated that staffing and administrative costs will increase by at least 35 percent. A secondary and potentially of greater consequence of a consolidated MPO and/or creation of unified planning products will be to make it more difficult for municipal governments to pursue and receive funding for local projects. It is estimated that this has the potential effect of reducing federal funds to localized projects by as much as \$90 million per year. The proposed rule does not increase funding to the MPOs resulting in diminished MPO attention to matters of local concern and other federal planning emphasis areas in order to implement the proposed rule. This contradicts the FAST Act increase of funding in the portion of the Surface Transportation Program available to MPOs for allocation to local projects in order to increase federal support for locally identified projects.

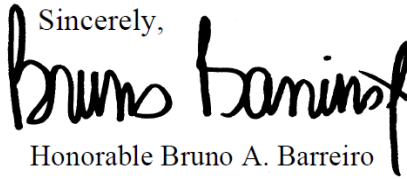
Based on the above specific comments, the SEFTC strongly opposes the proposed metropolitan planning organization coordination and planning area reform rules and respectfully requests that they be withdrawn without further action.

Sincerely,



Honorable Susan Haynie
SEFTC Chair
Palm Beach MPO

Sincerely,



Honorable Bruno A. Barreiro
SEFTC Vice Chair
Miami-Dade MPO Board

Sincerely,



Honorable Bryan Caletka
SEFTC Member
Broward MPO

C: Broward County Congressional Delegation
Miami-Dade County Congressional Delegation
Palm Beach County Congressional Delegation