



August 17, 2016

The Hon. Gregory Nadeau
Administrator
U.S. Department of Transportation
Federal Highway Administration
1200 New Jersey Ave, SE
Washington, D.C. 20590

RE: Metropolitan Planning Organization Coordination and Planning Area Reform Notice of Proposed Rulemaking (Docket No. FHWA-2016-0016)

Dear Administrator Nadeau:

Forward Pinellas, in its role as the metropolitan planning organization (MPO) for Pinellas County, Florida, offers the following comments on the proposed rule for Metropolitan Planning Organization Coordination and Planning. We applaud the goals of the proposed rule that seek to foster improved regional leadership and coordination in the metropolitan transportation planning process. Regional coordination is essential for economic growth and sustainability in today's increasingly inter-connected world. Florida has long been a leader among states in developing and implementing the structural arrangements necessary to support regional coordination within complex single urbanized areas.

In our region, the West Central Florida MPO Chairs Coordinating Committee (CCC) was officially formed in 1992 following the 1990 census and the Governor's re-designation of the individual county-specific MPOs. This was the first formal regional MPO alliance in Florida. It is established in Florida Statutes and has continued to evolve to ensure a consistent, coordinated and comprehensive planning process within an eight-county dynamic region, resulting in adoption of successive regional long range transportation plans, regional public involvement plans, regional congestion management plans and a conflict/dispute resolution process shared by the six MPOs in the alliance. More recently, the three MPOs within the Tampa-St. Petersburg Urbanized Area established the more focused Transportation Management Area (TMA) Leadership Group to foster collaboration and set regional priorities for the Hillsborough, Pasco and Pinellas County Metropolitan Planning Area. Those efforts have been expanded upon through a tri-county Local Coordinating Board for transportation disadvantaged planning and tri-county Bicycle/Pedestrian Advisory Committee.

Against that backdrop, Forward Pinellas supports elements of the rule that clarify the definition of Metropolitan Planning Area (MPA) and provide for a single set of planning work products for multiple MPOs that choose to remain as separate entities within a single MPA. We do, however, have concerns about the proposed rule and how it may be implemented.

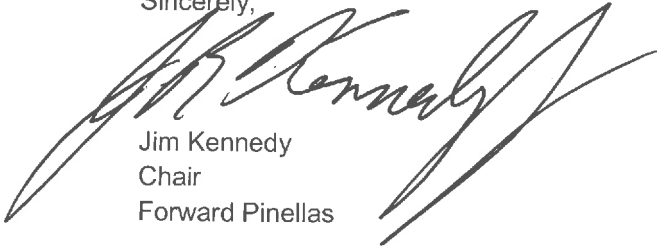
1. The Notice of Proposed Rulemaking (NPRM) provided insufficient time to assess its implications on the MPO's planning process and its partners in the complex Tampa Bay region. The timing of the advertisement during the traditional summer recess month in our region deprived our board of formally discussing the issue, which presented a unique challenge to understanding implications of the rule and preparing a thoughtful response.

2. We are concerned that the proposed rule is a heavy-handed, federal- and state-centric approach to transportation governance. MPOs were created to represent the interests of the local communities in transportation decision-making. If too much emphasis is placed on the regional level, it undermines local authority and smaller local governments risk losing their voice in helping set the transportation agenda. For instance, Forward Pinellas represents 25 local governments in urban, heavily developed Pinellas County. Combined, those smaller coastal communities contribute \$9 billion in economic impact to our region. Neighboring counties within our MPA have a vastly smaller number of local governments each. Further, the proposed rule fails to reflect the fact that states, such as Florida, establish a maximum number of voting members for MPOs and require a minimum number of county commissioners, which could squeeze out the influence of smaller communities in the MPO planning process.
3. Rather than mandate a structure, the final rule should encourage regional leadership by empowering MPOs to work with agency partners to clearly define agency missions, roles and responsibilities in a way that does not remove local authority. States empower MPOs differently. States like North Carolina and Florida give vastly different levels of support and deference to MPO plans and decision-making. Unlike North Carolina, Florida has chosen to generally empower MPOs with the tools, training and responsibilities to set the regional transportation agenda and successfully plan, design and advance multimodal projects from concept to construction. MPO plans are essential and integrated into the statewide and regional transportation funding process. Funding is the critical element that achieves regional planning outcomes. Consideration should be given for clearly defined financial incentives to multiple-MPO regions that demonstrate they have formal mechanisms, shared tools and agreements in place to establish greater regional leadership and a commitment to achieving performance-based outcomes.
4. The final rule should clarify the implementation time frame relative to the next census and the MPO's cycle of adopting its Transportation Plan. While the proposed rule states there is a two-year window for implementation from when the final rule is published, elsewhere the rule references implementation as occurring with development of the Metropolitan Transportation Plan after the next census, which would be sometime after 2020. A two-year implementation window may not allow sufficient time for those MPOs, such as Forward Pinellas and others in Florida, that have MPO apportionment, governance and planning requirements established in state statute.
5. The proposed rule places final decision-making authority in the hands of the governor and US DOT. If the MPOs and governor do not agree on how to achieve the objectives of the proposed rule, the status quo should remain in those MPAs with multiple MPOs that have an established regional alliance responsible for developing a regional transportation plan and setting regional priorities.
6. The proposed rule unlinks the important connection between land use and transportation in favor of a regional MPO framework. In complex urbanized areas like Tampa Bay, the proposed rule further separates the important role transportation plays in local land use decisions and economic development. Forward Pinellas, like other Florida MPOs, was created at a jurisdictional scale of county government to help achieve the state's Growth Management Act provisions in the 1970s. More recently, through a special act of the Florida Legislature, Forward Pinellas unified the MPO and countywide land use agency (Pinellas Planning Council) under a single governing board of 13 elected officials. The synergy created through this unique arrangement could be undone by the proposed rule essentially mandating a multi-county MPO for the planning area.

7. The proposed rule risks further separating MPOs from local community input and places an additional financial burden on local governments and citizens for required travel to advisory committee meetings across a large metropolitan region. That imperils meaningful opportunities for input from members of our Citizens Advisory Committee, Bicycle/Pedestrian Advisory Committee and any of the citizens' committees formed within the 24 municipalities within Pinellas County.

In summary, we believe the proposed MPO Coordination and Planning Area Reform ignores the differences in how states empower MPOs and threatens to further separate the important linkage between metropolitan transportation planning, land use planning and economic development. The Tampa Bay region has a long history of enhanced regional coordination, dating to the early 1990s, and those efforts continue to evolve and grow stronger. Working together as a region, we have achieved success advancing regional transportation projects for roads, bicycle/pedestrian networks and transit projects. While we embrace the goals of the proposed rule, such as creating one set of planning products for a single Metropolitan Planning Area with multiple MPOs, we respectfully request a reconsideration of the specific mechanisms for achieving those goals solely through a consolidated regional governance plan.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read "Jim Kennedy". The signature is written over the printed name and title.

Jim Kennedy
Chair
Forward Pinellas