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Matthew Kelly
FAMPO Chairman

Paul Agnello
FAMPO Administrator

August 19, 2016

Docket Management Facility
U.S. DOT
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Metropolitan Planning Organization Coordination and Planning Area Reform

Dear Sirs:

On behalf of the Fredericksburg Area Metropolitan Planning Organization (FAMPO), I am writing to provide our comments on the proposed rule-making cited above. FAMPO is one of the MPO's directly affected by this proposed rule.

We have serious concerns about this rule and request that it be cancelled for the following reasons:

1. **No Statutory Relevance:** MAP-21 and FAST Act were recently enacted into Federal law, and neither measure provided any legislative change requiring this action. What, then, is the basis for this rule?
2. **No Documentation of Existing Coordination Problems:** We are aware of no documentation of existing coordination problems. In our own case we have a Memorandum of Understanding (MOU) with our adjoining MPO, the Transportation Planning Board (TPB). This MOU was adopted by both MPOs after the 1990 Census, in which a portion of Stafford County was attached to the TPB's urbanized area (UZA). The MOU requires FAMPO and the TPB to fully coordinate their efforts in the areas of long range planning, TIP development, Title VI compliance and other areas. Our latest joint Certification Review, completed in 2015, contains commendations for various areas of our programs but contains no recommendations or corrective actions for our ongoing coordination efforts. What actual problems will this rule solve?
3. **Additional Coordination Already Occurring:** In addition to the MOU cited above, FAMPO and the TPB also coordinate closely in the areas of major corridor planning, demographic projections and modeling. For example FAMPO and the TPB recently coordinated with the Virginia Department of Transportation (VDOT) in the Commonwealth's application for FAST LANE grant funds for improvements to the "Atlantic Gateway." These funds will supplement other Federal, State and private sector funds to make major and badly needed improvements to roadways and rail in the Greater I-95 Corridor, between Washington, D.C. and Fredericksburg

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and beyond. As demonstrated above, both the TPB and FAMPO are working cooperatively and are willing to do more coordination, to the extent such actions make sense for the greater Region.

4. **Potential Loss of Local Voices in Major Project Planning and Funding:** The rule requires that MPOs in the same UZA be forced to merge, unless issues of size and complexity make this unrealistic. This provision has been in Title 23 for decades. The rule further requires that, where MPOs do not merge, they adopt single long range plans and single Transportation Improvement Programs (TIPs). This requirement would undermine the ability of local elected officials and the public in large UZAs to represent their policies and priorities through the MPO process. The importance of these local voices is a key under-pinning of MPO law in the United States dating back to the 1970s.

In summary, we urge the U.S. DOT to cancel this proposed rulemaking and to rethink how to make MPO coordination and cooperation more effective.

Sincerely,



Matt Kelly
FAMPO Chair

Cc: **FAMPO Policy Committee
Transportation Planning Board
Honorable Aubrey Lane, Commonwealth Transportation Secretary**