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September 28, 2012

Administrator Peter Rogoff
Federal Transit Administration, East Building
1200 New Jersey Avenue S.E. 5th Floor, Suite E-57
Washington, DC 20590

Re: “Moving Ahead for Progress in the 21st Century Act” (MAP-21) Implementation

Dear Administrator Rogoff:

The enactment of MAP-21, as a two-year bill, provides the states with the planning horizon necessary to continue developing and programming important transportation projects critical to the nation’s economic prosperity. The bill delivers more than \$10 billion annually in federal transit funding; provides meaningful process reforms necessary to accelerate project development and delivery; apportions a larger share of total federal aid for transit programs through formulas; and sustains important program and project eligibilities enacted in transportation acts that preceded MAP-21.

As you and your staff begin the process of implementing the new transit provisions in MAP-21, the American Association of State Highway and Transportation Officials (AASHTO) is prepared to serve as a resource to ensure the current program transitions in an effective and timely manner. In the spirit of providing guidance and technical expertise on behalf of the states, and with the implementation of new programs fast approaching, AASHTO proposes the following recommendations for your consideration.

Formula grants for the Enhanced Mobility of Seniors and Individuals with Disabilities (5310)

- Provide maximum administrative program flexibility in proposed rulemaking and revised program circulars, by authorizing large urbanized areas to transfer Section 5310 funding to states for statewide administration/programmatic efficiency.
- Define the term “projects selected for funding must be included in a locally developed, coordinated public transit-human services transportation plan” as illustrative and eligible project activities. These plans are intended to be longer-range documents that bring together and identify the general needs of eligible program participants. Projects selection should continue through the competitive solicitation process and should allow projects to be derived from needs, gaps or strategies included in the local or state-wide plans.

Performance Measures

- Limit the role in performance measurement and target setting to the portions of the transit system that receive their federal funds from State DOT’s (i.e., rural and specialized).
- Concentrate reporting to FTA on progress in meeting performance measures and targets at a high level and not require a higher frequency or level of detail than is currently required for the National Transit Database.

Safety and Security

- Utilize existing safety and security programs used by states such as the Community Transportation Association of America's Certified Safety and Security Officer Program as the framework for rural and specialized transportation systems. The carefully crafted and comprehensive safety and oversight framework was developed in consultation with FTA and states and was also endorsed by the FTA as a model safety program for smaller systems.
- Convene a workgroup, including State DOTs to advise FTA on the development of safety plan requirements to be used for rural and specialized transportation systems that receive their federal funds through the states.

Asset Management

- Convene a workgroup, including state DOTs to develop and implement asset management and SGR definitions and principles for the rural transit systems.
- Focus, required reporting for rural and specialized systems on asset conditions to broad categories and classes of assets. The Frequency or level of detail should be less intense than currently required for the National Transit Database.

Your leadership in sustaining a strong federal partnership with states and public transportation systems has been unparalleled. AASHTO appreciates the opportunity to work with FTA on the implementation of MAP-21 and your consideration of our views.

Sincerely,



John Horsley
Executive Director, American Association of State Highway and Transportation Officials



Shailen Bhatt
Secretary, Delaware Department of Transportation
Chair, AASHTO Standing Committee on Public Transportation