

**Testimony of Richard Perrin
Executive Director
Genesee Transportation Council
and
Vice President
Association of Metropolitan Planning Organizations**

**U.S. House of Representatives
Subcommittee on Highways and Transit**

**Hearing on:
"Implementing MAP-21: The State and Local Perspective"**

April 25, 2013

Chairman Petri, Ranking Member DeFazio, and distinguished members of the House Highways and Transit Subcommittee, I want to thank you for the opportunity to provide input on the implementation of Moving Ahead for Progress in the 21st Century (MAP-21) on behalf of the Association of Metropolitan Planning Organizations (AMPO). My name is Richard Perrin and I am the Executive Director of the Genesee Transportation Council, the metropolitan planning organization (MPO) for the Genesee-Finger Lakes Region which includes the Greater Rochester, New York area, and the current Vice President of AMPO.

AMPO is a not-for profit membership organization established in 1994 to serve the needs and interests of the approximately 400 MPOs that currently exist nationwide. Metropolitan areas are the nation's economic engines. According to the Census Bureau more than 85 percent of Americans live in metropolitan areas. These regions drive the nation's economy and compete head-to-head with economies across the globe. Because the pricing of our goods and services in the international marketplace largely determines our ability to compete successfully, we must be able to transport these goods and services efficiently. The quality of metropolitan transportation infrastructure — highways, bridges, airports, transit systems, rail, and ports — is, therefore, a primary factor in American economic competitiveness.

Program Restructuring

MAP-21 represents a fundamental and needed shift in federal transportation policy and investment decision making. While the implementation of many of the elements contained in MAP-21 is being advanced through the required rulemaking processes, one of the primary reforms has already taken place: the restructuring of core highway formula programs.

As you are aware, MAP-21 places an increased emphasis on the National Highway System, including extending it to comprise all roadways classified as Principal Arterials and the bridges that carry these roadways. The Fiscal Year 2013 Federal-Aid Highway Program Apportionments (the first to be made under MAP-21) increase the amount of required federal investment on the National Highway System by 50 percent from the Revised Fiscal Year 2012 Apportionments for Core Federal-Aid Highway Programs pursuant to the Surface Transportation Extension Act of 2011, Part II, as amended.

National Highway System facilities carried approximately half of the vehicle miles traveled in 2011, the last year for which data is available through the Federal Highway Administration, Office of Highway Policy Information's Highway Statistics Series. Clearly, their importance is recognized by the agencies that own, maintain, and operate them – primarily state departments of transportation. In 2011, only five percent of bridges on the National Highway System were classified as Structurally Deficient compared to 13 percent of bridges carrying non-National Highway System roadways.

Given that the level of funding to the Federal-Aid Highway Program has remained flat from Fiscal Year 2012 to 2013 and that National Highway System facilities are by and large in better condition than other roadways and bridges, there should be a mechanism included in the successor to MAP-21 that provides for metropolitan areas to be able to make a direct request to FHWA for a streamlined transfer of National Highway Performance Program funds to other programs (namely, the Surface Transportation Program), provided that the performance requirements for the Interstate System and National Highway System bridges as contained in Section 1106(f) of MAP-21 have been met and can be maintained in the Metropolitan Planning Area of the MPO making the request.

While there is a clear national interest in a well-maintained, highly-functional National Highway System, there is also a clear national interest in ensuring that limited federal transportation funds can be invested where needed so that the surface transportation system as a whole performs at the optimal level, regardless of mode of transportation or ownership of infrastructure. The restructuring and consolidation of programs under MAP-21 was intended to provide greater flexibility. Careful attention should be paid to the actual and projected effects of this restructuring. Even a flawless National Highway System can only see its benefit maximized if persons and freight can make their way to it via the roads and bridges that connect to it, many of which are owned by local governments.

Performance Management

The transition to a performance and outcome-based planning and programming is probably the single most needed change that MAP-21 makes. The increase in accountability and transparency provided by the reporting of system performance by MPOs, states, and transit operators coupled with the investment decision making processes required to make progress toward associated goals should pay dividends in improving the level of trust among the public and businesses that the revenue they provide is being put to the highest and best use. Further, effectively communicating both achievements and additional needs may allow for a more constructive public discourse on additional funding for transportation and other infrastructure.

Most importantly, meeting the performance management requirements of MAP-21 will be dependent on MPOs and other agencies being able to conduct the goal setting and monitoring activities in a cost-effective manner given limited budgets and having sufficient revenues to implement the improvements necessary to attain the goals. One area that can and should be able to show immediate improvement is reduction in project delivery delays. Regulatory revisions that will realize improvement in this performance area should also result in reduced costs on a per project basis, resulting in savings that can be programmed to additional projects.

With that said, a federal approach to setting performance measures must not be prescriptive. AMPO recommends that the measures and targets not be overly rigid, but instead allow for selection in a manner that is responsive to statewide and regional priorities, recognizing that MPO measures must address the articulated national policy goals and be coordinated with

states and providers of public transportation to ensure consistency. Measures should be defined broadly at the national level, and then refined at the state and local levels.

MPOs have existing procedures for some measures and targets, particularly where the air quality conformity process is required, and these procedures should be incorporated into the federal process when applicable. State targets should account for the differences between urban and rural areas. Variations occur among different urban areas. A prescriptive approach for all urban areas in even a single state may not result in the desired benefits.

Certain measures and targets are not in the purview of the MPO and, to a significant degree, are the state departments of transportation's and transit operators' prerogatives. The final rule on this matter should clearly define how other agencies' goals, objectives, performance measures, and targets should be integrated into the metropolitan planning process. The amount of MPO involvement in the target setting process hinges upon how the U.S. Department of Transportation interprets "in coordination." MPOs best understand the nuances of their regions and can be valuable partners in the target setting process.

Freight

Recognition at the federal level of the need to more fully consider and integrate freight is welcomed. In addition to the employment generated in the planning, design, construction, and manufacturing industries through the maintenance and rebuilding of transportation infrastructure and vehicles, freight represents the most direct contribution of the transportation system to economic development. The competitiveness of American manufacturers (including agricultural operations and associated processing) is dependent on a safe, reliable, and efficient network for moving goods at all stages of production – raw materials, intermediate inputs, and finished products.

Metropolitan regions are complex. Accessibility to destinations, efficiency and reliability of travel for people and goods, and safety and security, together, underlie a sound economy and quality of life that are interconnected elements in all regions. AMPO supports the designation of a national freight network and the associated goals Congress included in MAP-21. The network

and goals will facilitate a national investment strategy in multimodal facilities critical to transnational and interregional movement of freight.

Freight planning is multifaceted, involving both public and private entities, using highways, railroads, airports, and waterways. The American freight network interconnects with and will benefit from greater emphasis in the MPO planning process. MPOs possess the technical capability to integrate freight movement with all other metropolitan travel. They provide the cooperative decision making forum that engages local officials, representatives of state departments of transportation, regional authorities, and private businesses. MPOs must play an important role where freight corridors traverse metropolitan areas.

Transit Representation

AMPO appreciates the transit community's concerns on the need for greater coordination between all transportation modes. Several MPOs nationwide administer transit programs, an even greater number conduct the transportation planning for transit systems, and AMPO agrees that MPOs should take into account the views of public transportation providers in planning and project selection decisions.

The relevant provisions of MAP-21 were written broadly to allow for maximum flexibility in implementation. We request that USDOT maintain the same intent when promulgating regulations or guidance. Granting maximum flexibility in identifying the type and quality of representation that determines a region's policy and funding priorities is crucial to ensuring that unintended consequences which could reduce the quality of transit representation that exists today are avoided to the maximum extent practicable.

It is important to note that transit providers may already serve on the Boards of their respective MPOs. Through state law and/or local jurisdictional agreement this may take a variety of forms, including current representation on MPOs by transit providers with independent boards of commissioners, representation by local elected officials who sit on the governing boards of both the MPO and the transit provider, and MPO board members whose jurisdictions are the primary owner and operator of local public transportation services.

Conclusion

We're all in this together. The impacts – positive and negative – of transportation do not begin nor end at the boundaries of metropolitan and rural areas or states. MPOs, federal agencies, state departments of transportation, public transportation operators, regional transportation planning organizations, and private freight-related interests (e.g., railroads, manufacturers, etc.) have a shared responsibility to the public and each other to work cooperatively in the interests of this great nation under the direction provided by Congress. MPOs stand ready to go above and beyond to ensure the continued economic and social vitality of all areas. Again, thank you for the opportunity to provide testimony on the vital work undertaken by this Subcommittee.