

National Capital Region Transportation Planning Board

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DRAFT December 6, 2013

The Honorable Peter Rogoff
Administrator
Federal Transit Administration (FTA)
U.S. Department of Transportation (USDOT)
1200 New Jersey Avenue, SE
Washington, DC 20590

SUBJ: Comments on The National Public Transportation Safety Plan, the Public Transportation Agency Safety Plan, and the Public Transportation Safety Certification Training Program; Transit Asset Management [Docket No. FTA-2013-0030]

Dear Administrator Rogoff:

The National Capital Region Transportation Planning Board (TPB), the metropolitan planning organization (MPO) for the metropolitan Washington, DC area, greatly appreciates your efforts and those of FTA staff to provide opportunities for input and consultation on the development of rulemaking for the new Public Transportation Safety Program (National Safety Program) and transit asset management provisions (National TAM System), as authorized under the Moving Ahead for Progress in the 21st Century (MAP-21) legislation. The TPB looks forward to working closely with the FTA in the development of the metropolitan planning process to consider and integrate public transportation provider Transit Asset Management (TAM) and Safety Plans and targets into the decision-making process.

The TPB staff has coordinated with our transit agency partners, including the Washington Metropolitan Area Transit Authority (WMATA), the Maryland Transit Administration (MTA), and the Potomac and Rappahannock Transportation Committee (PRTC), as well as state and local agencies that are recipients and sub-recipients of FTA funds, in developing the following comments on the Federal Register advanced notice of proposed rulemaking (ANPRM) of October 3, 2013. Specifically, the TPB is responding to the questions (numbers 116 to 121) posed in Section IX. *Coordination of Targets and Plans with Metropolitan, Statewide and Non-Metropolitan Planning.*

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116. What procedures or requirements should FTA establish to ensure that Transit Agency Safety Plan and TAM Plan goals, measures, and targets from individual transit systems are integrated into the metropolitan transportation planning process?

The TPB is charged with producing long-range transportation plans and transportation improvement programs (TIPs) for the National Capital Region, which includes the District of Columbia as well as portions of the States of Maryland and Virginia. The TPB fulfills responsibilities for the federally required metropolitan planning process, as well as providing a forum for regional coordination and technical resources for decision-making. As part of the MAP-21 metropolitan planning process, with its adoption of performance goals, measures and targets for surface transportation, the TPB recognizes the need to collect, analyze, and report on performance data, on either a regional basis or through the summation of local data as appropriate. The TPB would welcome guidance from USDOT and FTA in the specification of adequate data collection, analysis, and reporting processes and mechanisms, while recognizing that these requirements could easily pose considerable administrative requirements with modest benefit or worthwhile use for the effort of the data process. Accordingly, the TPB suggests that procedures or requirements for Safety and TAM Plans be as general as possible, and be process-oriented or outcome-oriented rather than administratively or quantitatively prescriptive.

117. Should MPO's be required to set a region-wide target for transit state of good repair, or should MPO's be required to incorporate the both safety and transit state of good repair targets from each transit system within their jurisdiction into the performance-based planning process, or should have MPO's have discretion to choose between these two approaches?

The National Capital Region has thirteen providers of public transportation, three of which are Section 5307 recipients. These providers operate a wide range of services, ranging from urban bus to commuter bus, and also heavy rail, commuter rail, and - in the very near future - streetcar. These providers face different situations of infrastructure condition, age, and ownership; of rolling stock types and use; and of external road and rail traffic use. Accordingly, the TPB considers that it may be impractical to set region-wide targets for safety or state of good repair and asset management. Depending upon the performance measures that are established by the FTA for state of good repair, as well as the final requirements for data collection and reporting, the TPB would prefer to have the

discretion to set either region-wide or individual transit provider targets for any specific proposed measure of safety or state of good repair.

118. What procedures or requirements should FTA establish to ensure that Transit Agency Safety Plan and TAM Plan goals, measures, and targets from individual transit systems are integrated into the statewide and nonmetropolitan transportation planning process? Since States are already setting the transit SGR performance targets for rural area grants received by the State, are any additional steps needed for integration into the planning process?

One of the Section 5307 providers of public transportation in the National Capital Region is the Maryland Transit Administration (MTA), which operates commuter buses and the (locally funded) MARC commuter rail system. The MTA’s services primarily provide public transportation between locations outside the TPB planning area and the metropolitan core. Accordingly, the TPB would endorse an option for Safety Plan and TAM Plan goals, measures, and targets associated with the operations, rolling stock, and facilities of state-wide or extremely large area providers to be incorporated into the statewide transportation planning process, rather than the metropolitan planning process.

119. Should FTA establish procedures or requirements to ensure that Transit Agency Safety Plan and TAM Plan goals, measures, and targets from individual transit systems are integrated into other metropolitan planning products, such as the Unified Planning Work Program (“UPWP”) and Congestion Management Process (“CMP”)?

The Unified Planning Work Program (UPWP) coordinates all federally assisted state, regional, and local transportation planning activities proposed to be undertaken in the metropolitan region. The TPB makes use of the annual UPWP to coordinate the fulfillment of its responsibilities for the federally required planning process, as well as to provide a forum for regional coordination and technical resources for decision-making. To meet the MAP-21 requirements for metropolitan planning organizations, public transportation providers, and states to establish and use a performance-based approach to transportation decision-making, the TPB intends to use the UPWP to provide the resources for collecting, analyzing, and reporting the performance measure data requested by USDOT. The TPB recommends that general language to this effect, including the maximum flexibility for fulfillment of these responsibilities, be included as a required element for the UPWP. Besides a listing of relevant

rules, however, the TPB does not see the need for greater specification in addressing transit agency safety plans and TAM plans in the UPWP.

The Congestion Management Process (CMP) is required to address congestion management through the safe and effective integrated management and operation of the multimodal transportation system based on a cooperatively developed and implemented metropolitan-wide strategy utilizing travel demand reduction and operational management strategies. While safety and good state of repair are fundamental to effective operation of public transportation services, it is not clear how long-term Safety and TAM Plans, based respectively on internal management procedures and training and on asset condition management and investment, would be directly relatable in a significant way to travel demand reduction and operational management at a metropolitan level. Accordingly, the TPB does not see the need for inclusion of any specifics of transit agency safety and TAM plans in the CMP.

120. FTA is interested in hearing recipient and stakeholder perspectives on how the investment priorities set forth in can be most-effectively reflected in the prioritization of projects, strategies, and resources – including Federal, state, and local funds – in MPO Plans and Transportation Improvement Programs, as well as the Long-Range Transportation Plans of States and Statewide Transportation Improvement Programs. Specifically, how should transit state of good repair needs identified in be addressed alongside other investment goals in these financially-constrained plans?

The eight planning factors of Title 23 which guide metropolitan transportation improvement programs and long-range transportation plans already include an emphasis on safety and state of good repair which embraces transit needs (specifically factors 2. *Increase the safety of the transportation system for motorized and non-motorized users*, and 8. *Emphasize the preservation of the existing transportation system*.) The TPB's Transportation Improvement Program (TIP), as required, includes transit, highway, bikeway, and pedestrian and ridesharing capital improvement projects as well as transit and ridesharing operating support, which can be implemented with already available and projected sources of transportation revenues while the existing transportation system is being adequately operated and maintained. State, regional and local transportation agencies in the National Capital Region update the TIP each year to reflect priority projects in the TPB's fiscally Constrained Long-Range transportation Plan (CLRP). Accordingly, the TPB considers that projects prioritizing transit safety and state of good repair needs have already been identified and selected for advancement

by their inclusion in the TIP and CLRP, and does not see the need for additional specification in any new rulemaking.

An understanding of the prioritization and impact of specific projects on safety and state of repair might be better addressed through a separate process for performance measurement and an appraisal of project selection for the TIP and CLRP in regard to observed trends and adopted targets.

121. How should safety targets be considered in the planning process by State's and MPOs? Should MPO's be required to set a region-wide safety target? Or, should MPO's be required to incorporate each of the safety targets from each transit system within their jurisdiction into the performance-based planning process? Or, should MPO's have discretion to choose between these two approaches? How would each approach make the planning process easier or more difficult for transit agencies?

As per the TPB's response to question 117 (above), the providers of public transportation in the National Capital Region operate a multitude of transportation services under varying conditions. As with asset management targets, depending upon the performance measures that will be established by the FTA, as well as the supporting data collection and reporting requirements, the TPB would prefer to have the discretion to set either region-wide or individual provider targets for any specific proposed measure of transit safety.

In summary, the TPB believe that the requirements for incorporation of TAM and Safety Plans for transit agencies in the metropolitan planning process should be: 1) outcome-oriented; 2) offer the maximum flexibility between regional and individual provider measurement, target-setting, and reporting, and 3) make use of current procedures and documents as much as possible. The TPB also feels that requirements and specifications should be based on the collection and reporting of practical, useful information, rather than overly detailed data collection. With many types of MPOs and transit providers across the country, there is a need for simple, broad guidelines when incorporating transit safety and state of good repair goals into the metropolitan planning process to meet the intent of MAP-21 legislation.

Thank you for considering these comments on the development of development of the metropolitan planning process to consider and integrate public transportation provider TAM and Safety

Plans and targets into the decision-making process. Please feel free to contact me or Eric Randall on my staff, at erandall@mwcog.org or (202) 962-3254, if we can provide any additional information.

Sincerely,

Gerald Miller
Acting Co-Director
Department of Transportation Planning
National Capital Region
Transportation Planning Board