

# National Capital Region Transportation Planning Board

777 North Capitol Street, N.E., Suite 300, Washington, D.C. 20002-4290 (202) 962-3310 Fax: (202) 962-3202 TDD: (202) 962-3213

## **Item #5**

### **MEMORANDUM**

**March 16, 2010**

**TO:** Transportation Planning Board

**FROM:** Ronald F. Kirby  
Director, Department of  
Transportation Planning

**RE:** Letters Sent/Received Since the February 17<sup>th</sup> TPB Meeting

The attached letters were sent/received since the February 17<sup>th</sup> TPB meeting. The letters will be reviewed under Agenda Item #5 of the March 17<sup>th</sup> TPB agenda.

Attachments

# National Capital Region Transportation Planning Board

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## **CONVERSATION ON REGIONAL TRANSPORTATION PRIORITIES**

**Wednesday, May 26, 2010**

**12:00 pm – 3:45 pm**

**Hyatt Regency Capitol Hill  
400 New Jersey Avenue, NW  
Thornton Room**

### **Background and Description**

At its meeting on November 18, 2009, the TPB voted to host an event this spring focusing on regional transportation challenges. This event will be a Conversation on Regional Transportation Priorities, and will be a facilitated and interactive program for TPB members, TPB Technical Committee members, members of the CAC, and representatives of other committees and subcommittees in the TPB committee structure. The goal of the Conversation on Regional Transportation Priorities is to bring together all groups in the TPB structure and to provide an opportunity for interaction around key transportation themes facing our region.

The Conversation will include a mix of context-setting presentations and organized, interactive table-top discussions that promote interaction among all groups in the TPB structure. An outside consultant will be hired to facilitate the table-top discussions. This Conversation will also provide an opportunity to address the CAC's recommendation that the TPB should develop a long-range regional transportation priorities plan.

### **Planning**

TPB Officers have reviewed the overall framework for this event. A planning team will be assembled to further shape the event's content. Staff recommends that this planning team should include up to three CAC members (representing VA, MD, and DC), up to six members of the TPB Technical Committee, the TPB Chairman, and a representative from the TPB's Access for All Committee. The planning team will conduct meetings via email, conference call, and in person as necessary.

### **Logistics**

The Conversation will be an invitation-based event. Registration will be required; there is no registration fee. Lunch will be provided. Participants will be asked to wear name badges, and to contribute actively in the Conversation.

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## **Memorandum**

March 11, 2010

To: Transportation Planning Board

From: Karin Foster, Department of Transportation Planning

Subject: TIGER funds awarded to CSX and NS

This memorandum provides information on the American Recovery and Reinvestment Act (ARRA), Transportation Investment Generating Economic Recovery (TIGER) grant funds awarded to the Class One railroads that operate in our region, CSX Transportation and Norfolk Southern. None of the projects for which CSX and Norfolk Southern were awarded fall within the National Capital Region.

CSX (National Gateway) was awarded \$98,000,000 in TIGER funds. CSX is able to fund 38 projects total, in Ohio, Pennsylvania, and West Virginia. CSX seeks another \$160 million to complete the National Gateway. The majority of these funds would go toward funding the Virginia Avenue Tunnel project.

CSX TIGER Freight Rail Awards			
Location	State	CSX	Description
Several	OH	\$30,000,000	Freight rail double-stack clearance
Several	PA	\$35,000,000	Freight rail double-stack clearance
Several	WV	\$33,000,000	Freight rail double-stack clearance
TOTAL		\$98,000,000	

Norfolk Southern (Crescent Corridor) was awarded \$105,000,000 in TIGER funds. These funds will go towards two intermodal facilities, one in Alabama and one in Tennessee.

Norfolk Southern TIGER Freight Rail Awards			
Location	State	NS	Description
Birmingham	AL	\$52,500,000	NS Crescent Corridor Intermodal Facility
Memphis	TN	\$52,500,000	NS Crescent Corridor Intermodal Facility
TOTAL		\$105,000,000	

**U.S. DOT Certification Review of the  
Washington, D.C., Metropolitan Area  
Transportation Planning Process**

April 15, 19-20, 2010

Washington Council of Governments, Washington, D.C

Location: Training Center  
777 North Capital Street, NE  
Washington, DC 20002  
(202) 962-3200

**April 15---Citizen Advisory Committee (CAC) Meeting**

The Federal review team will participate in the CAC scheduled meeting and engage in open dialogue with members. The discussion will address how successfully the public is able to participate in the transportation planning process in the metropolitan area.

**April 19-20, Certification Review**

**Format** for all sessions: Each topic is introduced by the federal team discussion leader, followed by a five minute overview and update by TPB staff (and other local agencies identified by the federal team). The federal team will then lead a discussion involving all participating agencies:

**Participants:** Citizen Advisory Committee

Washington, D.C. District Department of Transportation (DDOT)  
Maryland Department of Transportation (MDOT)  
Maryland State Highway Administration (MSHA)  
Virginia Department of Transportation (VDOT)  
Virginia Department of Rail and Public Transportation (VDRPT)  
Washington Metropolitan Area Transit (WMATA)  
18 Cities and Counties

**Federal Review Team Members:** FHWA/FTA Division and Regional staff

John Sprowls, FTA  
Keith Lynch, FTA  
Melissa Barlow, FTA  
Sandra Jackson, FHWA  
Ivan Rucker, FHWA  
Kwame Arhin, FHWA

**Review Team Resource Staff:** FHWA/FTA Headquarters, FHWA Resource Center, FTA Region 3, U.S. DOT/Volpe Center, and U.S. Environmental Protection Agency

Anna Biton, U.S. DOT/Volpe Center  
Melissa Laube, U.S. DOT/Volpe Center  
Shana Baker, FHWA Headquarters  
Martin Kotsch, EPA, Region 3  
Mohamed Dumbuya, FHWA Va. Division  
Supin Yoder, FHWA Resource Center  
Chip Millard, FHWA Headquarters  
Brenda Kragh, FHWA Headquarters

## DAY 1 – Monday, April 19

8:30 AM Certification Meeting (*Federal Review team only*)

**Format for all sessions:** The federal team discussion leader will introduce each topic, followed by a five-minute overview and update by TPB staff (and other local agencies identified by the federal team). The federal team will then lead a discussion involving all participating agencies:

**9:30 AM Overview of the Certification Process of the Transportation Planning Process**  
This opening session will provide a brief overview of the Certification Process and summarize issues from the 2006 Certification. TPB staff will then provide an update and summary of major regional issues and priority planning activities, with discussion among all participating agencies.

Federal Discussion Leader: Sandra Jackson, FHWA, D.C. Division  
Melissa Barlow, FTA DC Metro Office

**9:45 AM Overview of the Transportation Planning Board (including Committee Structure, Agreements, Self-Certifications, Unified Planning Work Program**  
Discussion will include over view of the MPO and the required elements of the Transportation Planning Process through these documents and activities.

Federal Discussion Leader: Melissa Barlow, FTA DC Metro Office  
John Sprowls, FTA, Headquarters  
Sandra Jackson, FHWA, D.C. Division  
Resource: Melissa Laube, U.S. DOT/Volpe Center

**10:45 AM Planning Factors, Long Range Plan, Transportation Improvement Program, and State Transportation Improvement Program**  
Discussion will include over-all planning process and the required elements of the Transportation Planning Process through these documents and activities.

Federal Discussion Leader: Keith Lynch, FTA, Region 3  
Ivan Rucker, FHWA Va. Division  
Resource: Melissa Laube, U.S. DOT/Volpe Center

**12:00 PM Lunch**

**12:30 PM Financial Planning and Financial Constraint**  
This session will focus on the funding in the Long Range Plan, TIP and planning process activities leading to identification of funding sources.

Federal Discussion Leader: John Sprowls, FTA, Headquarters  
Kwame Arhin, FHWA, Maryland Division  
Resource: Melissa Laube, U.S. DOT/Volpe Center



**2:00 PM**      **Congestion Management Process, ITS and Travel Demand Forecasting**  
Discussion will include requirements for Congestion Management Systems (recurring and non-recurring congestion) and travel demand modeling issues.

Federal Discussion Leader: John Sprowls, FTA, Headquarters  
Kwame Arhin, FHWA  
Supin Yoder, FHWA

Resource: Melissa Laube, U.S. DOT/Volpe Center

**2:45 PM**      Break

**3:00 PM**      **Air Quality Planning, SIP Planning and Conformity Issues**  
Experiences with air quality planning, SIP issues and conformity including effectiveness of inter-agency consultation procedures.

Federal Discussion Leader: Martin Kotsch, EPA Region 3

Resource: Melissa Laube, U.S. DOT/Volpe Center

**4:30 PM**      **Adjourn**

## **DAY 2, Tuesday, April 20, 2010**

**8:30 AM**      Continental Breakfast

**9:00 AM**      **Public Involvement Process, Civil Rights, Title VI and Americans with Disabilities Act**  
Discussion will include over-all public involvement processes by TPB and partners and the required elements of Title VI and requirements of the Americans with Disabilities Act.

Federal Discussion Leader: Melissa Barlow, FTA, D.C. Metro Office  
Mohamed Dumbuya, FHWA Va. Division  
Brenda Kragh, FHWA Headquarters

Resource: Anna Biton, U.S. DOT/Volpe Center

**10:15 AM**      Break

**10:30 AM**      **Freight Planning and Goods Movement / Transportation Management and Operations**  
Discussion will include overall Freight Planning and Transportation Management and Operations

Federal Discussion Leader: Sandra Jackson, FHWA D.C. Division  
Ivan Rucker, FHWA Virginia Division

Resource: Chip Millard, FHWA Headquarters

**11:30 AM**      **Lunch**

**12:15 PM Land Use, Livability, Sustainability, Multi-modal Planning**  
Discussion will include Land Use, Livability and Public Transit Issues

Federal Discussion Leader: Shana Baker, FHWA, Headquarters  
Tony Cho, FTA, Region 3

Resource: Anna Biton, U.S. DOT/Volpe Center

**2:00 PM Climate Change and Environmental Linkages**  
This session will include discussion of Climate Change and Planning and Environmental Linkages

Federal Discussion Leader: Shana Baker, FHWA Headquarters  
Keith Lynch, FTA, Region 3

Resource: Melissa Laube, U.S. DOT/Volpe Center

**2:55 PM Concluding Remarks/Adjourn**


**3:00 PM Meeting of Federal Review Team to prepare preliminary observations and close-out issues**

### **DAY 3, Wednesday, April 21, 2010**

**12:00 PM TPB Board Meeting /Chris Lawson, FHWA DC Division Administrator**  
Presentation of Certification Review Preliminary Observations

**MEMORANDUM**

**TO:** National Capital Region Transportation Planning Board

**FROM:** Nicholas Ramfos, Director, Commuter Connections 

**SUBJECT:** 'POOL REWARDS Demonstration Program Expansion

**DATE:** March 15, 2010

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Earlier this fiscal year, COG/TPB staff and a volunteer committee of Commuter Connections network members reviewed the top ten congested areas in the MSA with the goal of choosing corridors for implementing a carpool incentive and recommending the feasibility of implementing a demonstration program. The following three corridors were originally selected to operate the 'Pool Rewards demonstration program:

1. The I-495 Capital Beltway corridor from Bethesda to Tyson's Corner
2. The I-495 Capital Beltway corridor from I-295 (BW Parkway) to I-270
3. I-395 (14<sup>th</sup> Street Bridge) from Washington DC into Northern Virginia

'Pool Rewards program guidelines and implementation plans for each of these corridors were developed by a work group and were instituted as part of the pilot project. The duration of the financial incentive for the three recommended corridors was set at three months for each registered commuter and the pilot program can accommodate up to 745 participating commuters.

An additional element of the 'Pool Rewards demonstration program will be the preparation of an evaluation report. After measuring the benefits produced from the carpool financial incentive program, comparisons can be made from the expected outcomes to the actual outcomes in terms of auto occupancy and vehicle miles of travel, vehicle trips reduced and emission impacts.

The 'Pool Rewards pilot program was launched on October 26, 2009. The program was advertised and marketed and also garnered a great deal of media attention. However, the anticipated participation rates did not meet the set goal. After additional discussions with the three state funding agencies, the program has been expanded to include any new carpool



forming on any corridor in the region as long as the carpool's work destination is within the Washington DC non-attainment region. New carpools will need to register by March 31<sup>st</sup> in order that the carpool is eligible to receive the cash incentive within the 90-day time frame. Each carpooler can receive \$2 per day for carpooling, up to a maximum of \$130. The program expansion will also enable COG/TPB staff to collect the necessary data to produce an evaluation report on the project.

A press release which was sent last week is attached for your review.

FOR IMMEDIATE RELEASE March 11, 2010

CONTACT: Anne Marie Corbalis (845) 855-7077 /  
amcorbalis@archstreetcommunications.com

Steven Kania (202) 962-3249 / [skania@mwkog.org](mailto:skania@mwkog.org)

## Commuter Connections Gives Green Light to Expansion of Cash Incentive Program to Move Commuters into Carpools

*Participants Must Register by March 31*

**Washington, D.C.**—Commuter Connections is expanding its pilot program which encourages commuters in the Washington D.C. region to form new carpools in exchange for cash payouts. Known locally as 'Pool Rewards, the initiative is another innovative way Commuter Connections is trying to promote carpooling to and from work instead of driving alone. Originally limited to three major highway bottlenecks, it will now be open to all newly formed registered carpools traveling anywhere within the region.

Commuters may qualify for a \$1 each way incentive for carpooling during the 'Pool Rewards pilot program. The offer is only being made for a limited time. Those interested must register to join or form a new carpool by March 31, 2010. In order to receive payment, participants are expected to regularly report travel time through an online system. Commuter Connections also helps area residents find potential ridesharing partners by providing registered commuters with free access to a list of other commuters who live and work near them, have similar work schedules, and are interested in carpooling.

Commuter Connections, a regional transportation network coordinated by the National Capital Region Transportation Planning Board at the Metropolitan Washington Council of Governments (COG), is conducting the pilot program as part of its ongoing efforts to improve traffic flow, decrease air pollution and promote long-term changes in commuting behavior. 'Pool Rewards is similar to Atlanta's highly successful Cash for Commuters effort. At the end of its first five years, the Atlanta program coaxed more than 29,000 drivers out of their cars and saved 32.8 million vehicle miles traveled, with 64 percent of its participants continuing to use commute alternatives at least once per week after the cash reward program ended.

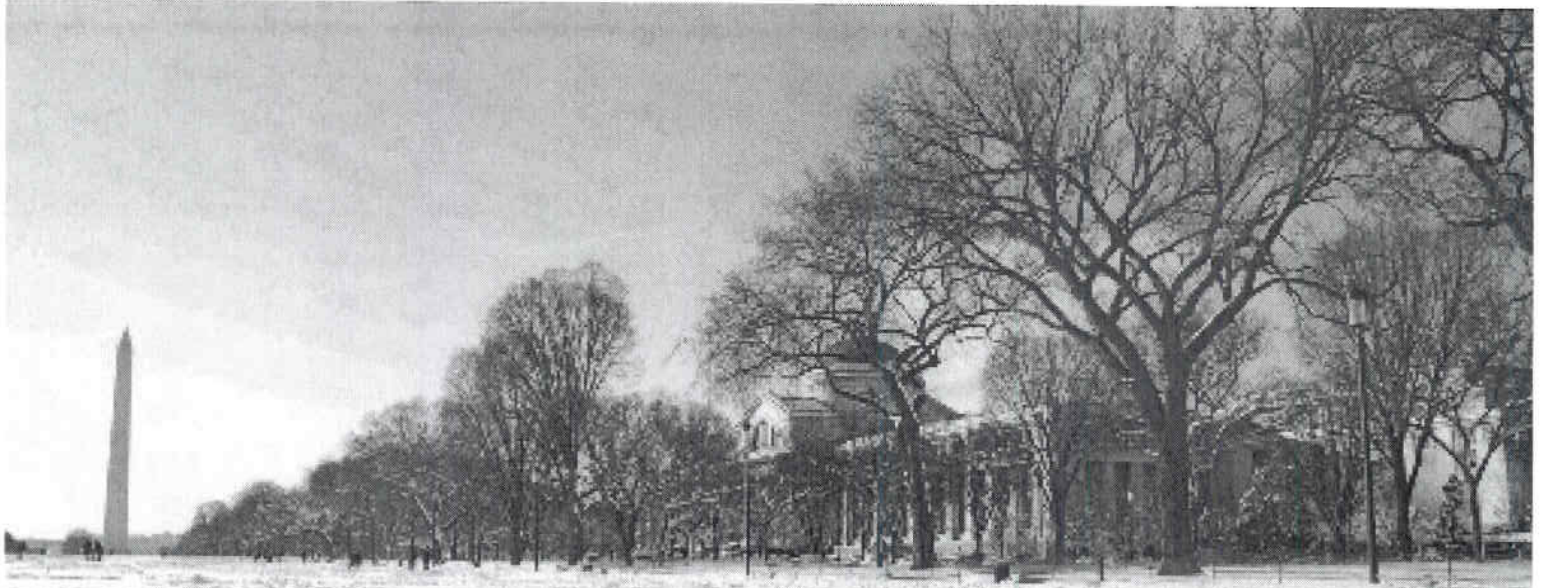
"We are always looking for new ways to get people in the D.C. area to carpool," said Commuter Connections Director Nicholas Ramfos. "Cash incentives have helped recruit new carpoolers in other areas, and we hope 'Pool Rewards can replicate some of that success."

Commuters who travel during peak commuting times can sign up for the 'Pool Rewards program at [www.commuterconnections.org](http://www.commuterconnections.org). In addition, ridesharing commuters may also be eligible for other money-saving services such as the free regional Guaranteed Ride Home program that ensures a ride home when one of life's unexpected emergencies arise. Some rules and limitations apply.

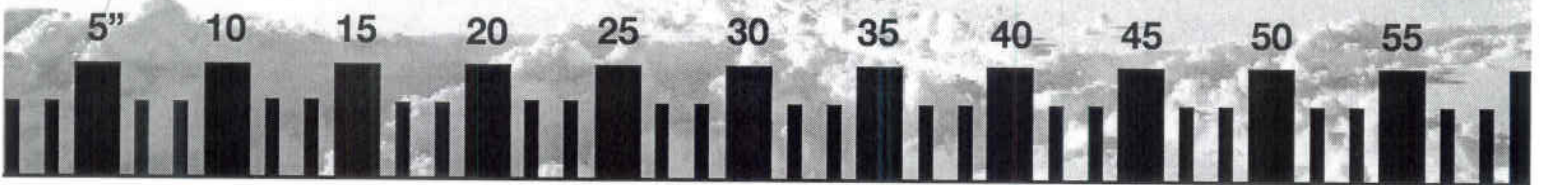
*Commuter Connections is a program of the National Capital Region Transportation Planning Board at the Metropolitan Washington Council of Governments. Commuter Connections promotes ridesharing to work and other alternatives to drive alone commuting, and provides ridematching for carpools and vanpools and offers the free Guaranteed Ride Home program. Commuter Connections is funded by the District of Columbia, Maryland, Virginia and U.S. Departments of Transportation. [www.mwcog.org](http://www.mwcog.org), [www.commuterconnections.org](http://www.commuterconnections.org).*

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## Snowpocalypse. Snowmageddon. Blizzard of 2010.



## Whatever you call it, it broke records.

COG is hosting an **after action leadership forum on the regional response to this season's unprecedented snow**, aimed at reviewing area coordination and response, and exploring opportunities for future improvement.

- Accuracy and timing of weather forecasts
- Expectations concerning snow removal for roads, sidewalks and transit
- Resources needed to speed area snow removal
- Contractors and other private sector resources
- Restoration of power and other critical infrastructure
- Decisions on government closure
- State and federal emergency declarations
- Outcomes and next steps in preparing for the 2010-2011 snow season

**Monday April 5, 2010  
1:30 p.m. - 4:00 p.m.**

Metropolitan Washington Council of Governments  
777 North Capitol Street NE, Suite 300  
Washington, D.C. 20002

### **By Invitation Only, Space is Limited**

Invitees include the COG Board of Directors, the National Capital Region Emergency Preparedness Council (EPC), city and county managers, federal and state officials, and representatives from area transportation and transit agencies, the private sector and other stakeholder organizations.

**Please RSVP by March 26.  
For more information,  
call 202-962-3220 or  
e-mail [snow@mwcog.org](mailto:snow@mwcog.org)**







ASSOCIATION OF  
METROPOLITAN  
PLANNING  
ORGANIZATIONS

**BY ELECTRONIC MAIL**

Office of Sustainable Housing and Communities  
Department of Housing and Urban Development  
451 7th Street, SW  
Room 10180  
Washington, D.C. 20410  
[sustainablecommunities@hud.gov](mailto:sustainablecommunities@hud.gov)

RE: Docket Number FR-5396-N-01  
Sustainable Communities Planning Grant Program; Advance Notice and  
Request for Comment, 75 Fed. Reg. 6689 (Feb. 10, 2010)

Dear Sir/Madam:

The Association of Metropolitan Planning Organizations (AMPO) is a nonprofit, membership organization established in 1994 to serve the needs and interests of metropolitan planning organizations (MPOs) nationwide. Federal highway and transit statutes require, as a condition for spending federal highway or transit funds in urbanized areas, the designation of MPOs, which have responsibility for planning, programming, and coordination of federal highway and transit investments. Metropolitan areas are the nation's economic engines. Almost three-quarters of our citizens live and work in these regions, which drive the nation's economy and compete head-to-head with regional economies in other countries. Thank you for the opportunity to provide comments on the proposed Sustainable Communities Planning Grant Program ("Advance Notice").

The Sustainable Communities Planning Grant Program seeks to support "cooperative regional planning efforts that integrate housing, transportation, environmental impact, and economic development." HUD is seeking input regarding "how the Program should be structured in order to have the most meaningful impact on regional planning for sustainable development." In short, MPOs should be essential and required participants in regional sustainable planning.

MPOs are uniquely positioned to participate in, and contribute to achieving the goals of, cooperative regional planning. As practitioners of transportation planning, MPOs have the responsibility and in many instances are required under federal law to conduct coordinated planning with our partners at the state and local levels of government, as well as the general public. Additionally, our members routinely work with representatives and officials responsible for other planning activities including land use, economic development, environmental protection, other modes of transportation, and freight movement. Many of our members go beyond the planning requirements of federal law and work with state and local housing agencies, education officials, and many other affected entities. The grants being proposed under this program could provide the necessary resources and incentives to broaden MPO planning capabilities and produce more coordinated and comprehensive plans.

AMPO would like to comment in response to several of the issues raised in the Advance Notice.

**A. Funding Should Be Directed at Enhanced MPO Planning as Well as Funding Implementation Actions**

AMPO fully agrees with the agencies' fundamental premise that regional planning ought to be coordinated across the various disciplines, including transportation, housing, social equity, economic development, and environmental protection, in order to achieve a more holistic and sustainable vision for urban communities. However, the type of planning envisioned by the Advance Notice is already being undertaken in many areas. Most frequently, the bottleneck that thwarts regional sustainable planning is not a lack of support for integrated planning or coordination among agencies, but rather a lack of adequate planning funding. Given the perennial erosion of funding to the Highway Trust Fund and recent Congressional budget rescissions, MPOs are experiencing widespread budget shortfalls and layoffs, and often have barely enough resources to complete required federal transportation planning functions -- even though, with expanded funding, MPOs could easily provide the broader planning support needed for successful regional sustainability planning and sustainable development. Accordingly, AMPO recommends that the agencies carefully consider the institutional planning capacity that currently exists within MPOs, and prioritize funding where existing capacity can be efficiently expanded, rather than creating redundant structures or bureaucracies.

Even in areas where MPOs and others have been able to obtain planning funds to support sustainability planning, a continuing impediment is the absence of adequate resources to implement sustainable strategies; therefore, AMPO recommends that a certain portion of Sustainable Communities Grants should be made available to carry out on-the-ground projects, particularly demonstration projects and those that have a catalytic effect on private sector and municipal investment.



## **B. Cost Share Requirements Should Be Sensitive to Local Financial Pressure and Should Recognize MPO Contributions**

With regard to the proposed 80:20 federal-local contribution, AMPO suggests that with the current financial crisis and widespread local and regional budget deficits, many regions may be unable to raise significant funding for coordination of regional planning activities; accordingly, we suggest any mandatory contribution be limited to an absolute minimum, and under no circumstances more than 10%. AMPO does agree with the suggestion in the Advance Notice that in-kind contributions should be recognized. Among other possibilities, the value of planning and modeling services provided by MPOs should be allowed to serve as in-kind contributions.

## **C. Relationship of Sustainable Grant Activities to Existing Planning Authorities**

The Advance Notice indicates that “the final product of a Sustainable Communities Planning Grant will be a Regional Plan for Sustainable Development and/or implementation strategy the meet the requirements of existing HUD, DOT, and EPA programs, such as Consolidated Plans, Long Range Transportation Plans and Stormwater Master Plans.” AMPO recommends that this language be modified to reflect that the Regional Plan for Sustainable Development be “consistent with” (rather than “meet the requirements of”) other planning documents. There are several important policy reasons for this small, but crucial, clarification.

First, the development of long range transportation plans (“LRPs”) is required as a condition of federal transportation funding under title 23 and title 49 U.S.C. In urban areas, this function is delegated exclusively to federally designated MPOs, under which decisionmaking is ultimately vested in local elected officials. A Regional Plan for Sustainable Development and/or implementation strategy funded by a Sustainable Communities Planning Grant would ideally influence the development and adoption of the relevant LRP in a particular urban area, but as a matter of existing federal law, could not substitute for the Congressionally mandated MPO planning process. The power of the Sustainable Development Plan would be to provide aspirational direction for the development of the LRP in order to guide the LRP toward more integrated, coordinated and sustainable regional planning. Requiring the Sustainable Development Plan to simply “meet” the LRP would undermine that guiding purpose. Conversely, if the grant program were to require LRPs to be conformed to the sustainability plan, a tension would arise vis-à-vis federally mandated decisionmaking processes that govern transportation planning.

Similarly, transportation plans, under Section 134(i) of title 23 U.S.C. must be fiscally constrained based on anticipated funding resources. As provided in federal transportation regulations, LRPs must include a “financial plan that demonstrates how the adopted transportation plan can be implemented, indicates resources from public and private sources that are reasonably expected to be made available to carry out the plan, and recommends any additional financing strategies for needed projects and programs.” 23 U.S.C. 134(i); 23 C.F.R. Part 450; 49 U.S.C. 5303(i); 49 C.F.R. Part 613. Requiring the final product of sustainability grants to “meet” this financial requirement under transportation law may not be achievable, particularly if full funding for on-the-ground implementation is not part of the Sustainable Communities Planning Grant. The fiscal constraint requirement is further complicated where the Sustainable Development Plan is made applicable to housing and stormwater plans, with the vast majority of housing decisions made by the private sector and dependent on consumer demand and access to available credit markets.

#### **D. MPOs Should Be Required Partners and Can Serve As the Lead Coordinating Body for Sustainability Planning**

Because of the central role of MPOs in metropolitan planning, MPOs can serve as a natural coordinator and eligible recipient of Sustainable Communities Planning Grants. Among other functions, MPOs are required by federal planning statutes to coordinate and/or consult with a wide range of stakeholders and government entities, and employ professional planners with the necessary training and skills to undertake and guide the Sustainable Development planning process contemplated by the HUD grant program. See, e.g., 40 C.F.R. 450.322 (“The MPO shall consult, as appropriate, with State and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning the development of the transportation plan.”). MPOs are staffed by professional planners and modelers that will be essential to developing and implementing sustainable communities plans. MPOs also have the institutional experience with administering planning funds and coordinating regional planning activities that will be needed for any sustainable planning efforts. Although MPOs are not typically responsible for stormwater plans, housing programs, or economic development, MPOs do offer the ability to coordinate these functions within a regional partnership.

Because of the expertise and functionality that MPOs offer, and in light of the federal authorities discussed above, AMPO strongly believes that MPOs must be required partners in any regional planning consortium, particularly where sustainable planning activities will affect and/or overlap with regional transportation planning. Indeed, it would be appropriate for MPOs to serve in a “lead agency” capacity with regard to convening, coordinating, and administering regional coalitions. Given appropriate channeling of funding through MPOs, MPOs offer the technical and organizational capacity, as well as the professional



and institutional experience, to overcome what HUD observes are too often “disjointed” and “fragmented” decisionmaking. Capacity should be built with a central coordinating function with requisite experience and training, rather than attempting to replicate such functions in a different body, thus avoiding duplication of costs and further fragmentation of planning efforts. Moreover, MPOs should themselves be eligible grant recipients given their multi-jurisdictional constitution and broad stakeholder relationships.

A handwritten signature in black ink, appearing to read "DeLania Hardy". The signature is fluid and cursive, with a large initial "D" and "H".

DeLania Hardy, Executive Director  
Association of Metropolitan Planning Organizations