



**NARC**

Building Regional Communities

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**Comments to FTA Docket Number FTA-2006-24037**

Elderly Individuals and Individuals With Disabilities, Job Access and Reverse Commute, New Freedom Programs and Coordinated Public Transit-Human Services Transportation Plans: Notice of Public Meeting, Interim Guidance for FY06 Implementation, and Propose

Coordinated Human Services Public Transit Coordination Plans- The draft guidance is clear on the intent of Coordinated Human Service Public Transit Service Delivery Plans. However, the guidance does not specify how these plans should relate to an MPO's long range Metropolitan Transportation Plan. It is the opinion of NARC that Coordinated Service Delivery Plans should expressly refer to the goals and objectives of the MPO long range plan. By connecting these plans in writing, we help to unify planning and promote a balanced transportation system.

MPO Monetary Assistance for Planning- If an MPOs is required by their state to perform planning for Coordinated Service Delivery, it should be provided with funding to complete this task. The guidance should state this requirement. Funding to support the planning process could come from the state DOT (example- Washington State DOT) or from the designated recipient of funds.

Large Urban Areas and JARC- The guidance should clarify which agency is responsible for planning for JARC funds in areas with a population of 200,000 or more. By statute, JARC funds will go to the recipient of Section 5307 (Urban Area Formula) funds. Frequently, this will be the public transit provider. The agency responsible for drafting Coordinated Service Delivery plans may not be the transit provider. In this case, how should planning should be done for JARC funds? The guidance should clarify this situation.

Consultation with Councils of Government- The guidance should add Councils of Government to the list of agencies that should be afforded consultation and participation privileges. COGs may have important information to contribute to the planning process.

Consultation with Metropolitan Planning Organizations- The guidance should add Metropolitan Planning Organizations to the list of agencies that should be afforded consultation and participation privileges. In many cases, MPOs will be performing planning for Coordinated Service Delivery. However, in the cases where another agency is doing the planning, it should be a requirement to consult with MPOs.

Coordination with Rural Planning Organizations- In some states, Rural Planning Organizations are established by state law. In others, RPOs are voluntary associations of units of local government. The guidance should add Rural Planning Organizations to its list of agencies that should be afforded consultation privileges. In some cases, RPOs will be performing planning for Coordinated Service Delivery. In the cases where another agency is doing the planning, it should be a requirement to consult with RPOs.

Existing JARC Plans- JARC plans can be an excellent starting point for building Coordinated Human Services Public Transit Service Delivery Plans. JARC plans were adopted under TEA-21 with emphasis on providing mobility options for those without an automobile. The framework for analyzing transportation-disadvantaged populations can be transformed to include New Freedom and Elderly/Disabled programs. The guidance should expressly state that existing JARC plans for FY2006 can be expanded to include other programs in FY2007 and beyond.

Requirement that New Freedom be target mobility options “beyond that which is required by the ADA”- Clarification is needed to differentiate between the levels of service expected by ADA. Further, guidance should clarify whether the intent was to refer to the ADA in full or only the transit element of the act (known as the Complimentary Paratransit provision).