



Florida Department of Transportation

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ANANTH PRASAD, P.E.
SECRETARY

January 17, 2014

Docket Operations
U.S. Department of Transportation
West Building, Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590-0001

Re: Docket No. FTA-2013-0043

To the Federal Transit Administration:

The Florida Department of Transportation (FDOT) is pleased to offer comments on the Notice of Request for Revision of a Currently Approved Information Collection issued by the Federal Transit Administration (FTA) in the November 22, 2013 Federal Register. FDOT and the metropolitan planning organizations (MPOs) within Florida invest considerable time and resources in transportation planning, so this is a topic of significant importance to us.

As the fourth most populous state (soon to become the third) with more than 90 million visitors annually, the mobility needs for people and goods within Florida are extensive. Florida has 26 MPOs, more than any state. Fifteen of these MPOs qualify as Transportation Management Areas. Our 19 million people, 67 counties, 411 municipalities, 11 regional planning councils, 35 fixed-route transit systems, 15 seaports, 15 railroads and 779 airports comprise a vast and complex system of planning partnerships and transportation facility and service provision. Clearly, this requires a robust planning process.

We believe the estimated annual burden hours of the transportation planning programs on respondents as contained in the Notice is understated and misleading for Florida. Certainly, the collective burden hours in a state like Florida far exceeds that of most states given our population, extensive transportation planning partnerships and our complex intermodal transportation system.

One of our MPOs provided an estimate of 15,608 hours for their area, nearly double the estimate provided in the Notice. Moreover, that estimate did not even include required

interagency consultation and involvement of federally specified stakeholder groups—each of which takes considerable time. Indeed, even the task of estimating the total annual burden hours within Florida would be a burden for FDOT and the MPOS with little benefit in relation to the effort.

In light of the above, we request that the Federal Transit Administration acknowledge that the total annual burden hours in states like Florida is far more significant than conveyed by the estimate of 8017 hours per respondent. Such an acknowledgement would be a meaningful recognition of the great demands on state and regional transportation organizations—which is one reason why state flexibility in the implementation of federal policy is so vitally important and compelling.

Of even greater concern to us is that the information from this sample is to be used as the basis for estimating the annual compliance burden for the forthcoming Notice of Proposed Rulemaking that the Federal Transit Administration and the Federal Highway Administration will be issuing next month. That NPRM will be used to implement changes in the metropolitan and statewide and nonmetropolitan transportation planning programs as a result of the Moving Ahead for Progress in the 21st Century Act (MAP-21). The new performance management requirements of MAP-21 will impact transportation planning for states and MPOs, but MAP-21's promise of greater flexibility and improved project delivery should be kept in order that any new requirements are balanced.

We remain hopeful that the regulations that do emerge will add value, empower and reflect partnership rather than regulatory burden and cost with limited value-adding benefit. Thank you for the opportunity to comment.

Sincerely,



Ananth Prasad, P.E.
Secretary

AP/dl