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November 6, 2006

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Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, SW
Nassif Building PL-401
Washington, DC 20590-0001

RE: DOT DMS Docket Number FTA 2006-24037, Proposed JARC, Elderly
Individuals and Persons with Disabilities, and New Freedom Circulars

To Whom It May Concern:

The Metropolitan Transportation Commission (MTC) is the metropolitan planning organization (MPO) for the nine-county San Francisco Bay Area. MTC serves as the designated recipient for the FTA formula funds for the Bay Area and is responsible for preparing the region's Transportation Improvement Program (TIP) and adopting the Regional Transportation Plan (RTP). MTC appreciates the opportunity to comment on the Federal Transit Administration's (FTA) Proposed Circulars pertaining to the Job Access and Reverse Commute, Elderly Individuals and Persons with Disabilities, and New Freedom Programs.

**Job Access and Reverse Commute, Elderly Individuals and Persons with
Disabilities, and New Freedom Programs**

Chapter II, Program Overview, Section 6: Coordination with Other Federal Programs

As MTC has previously commented, coordination is a two-way street, requiring the active participation of transportation and other agencies, such as Health and Human Services, the Administration on Aging, etc., in planning *and funding* the unique types of transportation projects eligible for these three programs. Often, there is no incentive on the part of non-transportation agencies to engage in planning efforts or to provide necessary data about funding transportation elements within their programs that could help facilitate coordination efforts. We urge the FTA-- and other federal agencies-- to actively seek opportunities to include similar coordination requirements in the authorizing legislation for all federal programs receiving federal dollars to provide transportation for their clients (e.g. Medicare, Older Americans Act, Vocational Rehabilitation Programs, etc.). At a minimum, guidance should be provided to those programs to authorize and encourage the use of their funds to serve as match to federal transportation programs subject to SAFETEA.

Job Access and Reverse Commute Program

Chapter III, General Program Information, Section 11: Eligible Activities

MTC supports the use of user-side subsidies, such as vouchers and transit passes, for eligible individuals on all services for an existing system. Transportation affordability is frequently raised by residents of the Bay Area's low-income communities participating in MTC's Community-based Transportation Planning Program, and has been cited as a transportation barrier by welfare recipients who have participated in MTC-sponsored welfare-to-work transportation planning.

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Affordability of transportation is particularly an issue when the use of multiple transportation systems is necessary to access jobs and schools. The cost of transportation may serve as a barrier to accepting or retaining employment. Subsidized transportation passes may reduce or eliminate this barrier. While subsidizing transit passes may not directly address the program goal of removing transportation *service* gaps, it may allow individuals and families to access additional jobs or training opportunities that they are unable to afford without the subsidies.

Thank you for the opportunity to submit comments on FTA program changes. If you have any questions about these comments, please feel free to contact Alix Bockelman, Director of MTC's Programming and Allocations Section at (510) 817-5850, or via email at abockelman@mtc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Therese McMillan", with a long horizontal flourish extending to the right.

Therese McMillan

Deputy Executive Director, Policy