

**Congress of the United States**  
**Washington, DC 20515**

August 25, 2016

Gregory G. Nadeau  
Administrator, Federal Highway Administration  
United States Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Carolyn Flowers  
Acting Administrator, Federal Transit Administration  
United States Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

RE: Metropolitan Planning Organization Coordination and Planning Area Reform Proposed Rulemaking -  
Docket No. FHWA-2016-0016

Dear Administrator Nadeau and Acting Administrator Flowers,

As the elected representatives for Merced and Stanislaus counties, we write in strong objection to the Metropolitan Planning Organization Coordination and Planning Area Reform Proposed Rulemaking (FHWA-20167-0016) as jointly released by the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) on June 27, 2016. We join Merced County Association of Governments (MCAG) and Stanislaus Council of Governments (StanCOG) in strong opposition to the proposed rule as it will undoubtedly disrupt the many years of successful and productive coordination and collaboration that has developed and flourished in our region over the last decade.

MCAG and StanCOG are among the Metropolitan Planning Organizations (MPOs) in California that will be affected by this proposed rule as the two agencies share the Turlock urbanized area (UZA). The two MPOs have a long-standing, efficient and productive relationship regarding the Turlock UZA. Changing this dynamic by implementing this proposed rule would not only fail to better serve the shared urbanized area, but would work against the existing collaborative structure that has proven to be successful and has produced great benefits across the region. The proposed changes would artificially create the type of conflict and issues that the proposed rulemaking is attempting to address but simply do not exist in our region under the current collaborative structure.

For the last decade, the eight MPOs in the San Joaquin Valley region including MCAG and StanCOG, have worked hard to form a regional structure for collaboration across the eight counties. Through this effort, the valley MPOs have successfully tackled regional issues making it a strong collaborative partner, not only within the region but also for California Department of Transportation (Caltrans), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA). With ten years of partnership history, the valley MPOs can boast an impressive number of planning, funding and policy achievements for itself and partner agencies in the areas of air quality, goods movement, regional rail, legislative advocacy and many others. The eight valley MPO executive directors meet monthly to share

information and coordinate regional activities, and several staff committees involving the eight MPOs meet regularly to discuss regional challenges and opportunities around modeling, federal and state legislation, air quality conformity, greenhouse gas emissions reduction target setting and the alignment of schedules for Regional Transportation Plans and other key planning documents. Our region is benefiting greatly from an open, voluntary structure for collaboration that is grounded in the motivation to achieve more for everyone by working together. This model has brought the valley MPOs lasting success and has greatly benefited the San Joaquin Valley's communities both large and small.

More specifically, and beyond the broader regional collaboration that exists across the eight valley MPOs, MCAG and StanCOG enjoy a productive relationship involving a number of key issues including how to best serve the Turlock UZA. A small portion of rural northern Merced County was included in the Turlock UZA for the first time in 2000. Following that action, MCAG and StanCOG entered into a memorandum of understanding regarding the coordination of ongoing transit planning and programming of federal transit funds for the Turlock UZA. This agreement established a cooperative relationship that has fostered comprehensive regional transit planning including open and productive communication over the last 16 years.

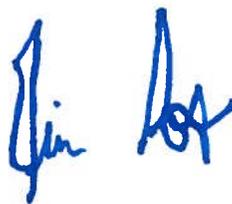
We recognize that there are many MPOs across the country that do not enjoy the cooperative spirit and commitment to collaboration that we have in the San Joaquin Valley. Our region has demonstrated how effective communication between MPOs can improve collaboration, policy implementation, technology use, and performance management across regional partners. As a result, we have benefited greatly from the improved decision-making and time and money savings through shared resources that comes with voluntary regional collaboration. However, this proposed rulemaking aimed at improving MPO coordination through forced collaboration would radically change the nature of the relationship between MCAG and StanCOG and would threaten to destroy and reverse the long history of coordination efforts in the region. The two MPOs have an efficient and productive relationship regarding the Turlock UZA and enjoy a regional partnership with the other six MPOs in the valley.

We urge FHWA and FTA to consider how this rule will impact existing regional planning efforts and partnerships that have a strong history of success and productivity. If universally applied as proposed, this rule would undoubtedly create challenges and political conflict in a region that has enjoyed the many benefits of regional cooperation and coordination for many years. We formally request that the Administration withdraw the jointly proposed rulemaking from further consideration.

Sincerely,



Jeff Denham  
MEMBER OF CONGRESS



Jim Costa  
MEMBER OF CONGRESS