

August 5, 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,

I 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.

The City of Merced joins Merced County Association of Governments (MCAG) in strong opposition to the proposed rule as it will undoubtedly disrupt the many years of coordination and collaboration that has developed and flourished in our region over the last decade.

MCAG is one of only two Metropolitan Planning Organizations (MPOs) in California that will be affected by this proposed rule as it shares the Turlock urbanized area (UZA) with Stanislaus Council of Governments (StanCOG). 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 arguably work against the existing collaborative structure that has proven to be successful and has produced many great benefits across the region. The proposed changes would artificially create the types 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.

I 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 conflict in a region that has enjoyed the many benefits of regional cooperation and coordination for many years. I formally request that the Administration withdraw the jointly proposed rulemaking from further consideration. Thank you for your time and attention to these concerns.

Sincerely,

Stanley P. Thurston Mayor City of Merced, CA