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Marc Boldt, Ghair • Jeanne E. Stewart • Julie Olson • David Madore • Tom Mielke

August 24, 2016

Secretary Anthony Foxx
United States Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Federal Docket No. FHWA-2016-0016

Dear Secretary Foxx:

Thank you for this opportunity to comment on the draft regulation for promoting efficient and effective regional transportation planning and the review of the benefits of unified regional transportation planning.

The MPO for Clark County Washington is the Southwest Washington Regional Transportation Council. Our partners in the urbanized area in the Portland, Oregon region have a separate MPO that falls under the authority and direction of the Metro Council. Due to the separation caused by the Columbia River, state boundaries, and different governments, there exist two coordinated MPAs.

The current draft rule for our region would require merger of our two MPOs and MPAs, crossing state boundaries with different laws, different standards and regulations and different legislative bodies.

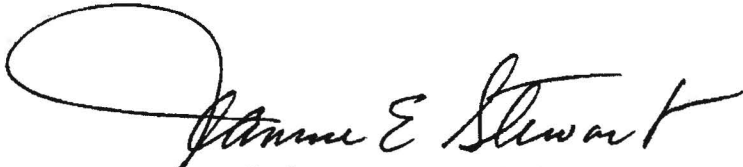
Long ago we saw the need for bi-state cooperation in transportation planning with Clark County representing more than 22% of the population in the combined region.

To accommodate those needs, a series of bi-state transportation policy advisory committees have been formulated and are secured by both bylaws and assigned bi-state representation. Those include JPACT (Joint Policy Advisory Committee on Transportation).

As a region with an established formalized, functional and operational partnership, we join with our partners in the Portland Metro Region and request that our region have an exception to this (draft) rule regarding merged MPO's. While our interstate

partnership may be enhanced by incorporating components from the draft rule, the existing system represents a better model for our local region than a single MPO would provide.

A similar issue is presented by the consolidation of MPA's; different counties from different states subject to very different laws, across a major river, involving multiple ports and cities would be required to generate a single plan. A more realistic alternative is the creation of two coordinated MPAs. We urge you to support this exception. In the alternative, if a single MPA will be required, it is critical that MPA priorities be allocated to the MPO's in relation to their pro rata population utilizing a process for dispute resolution.



Jeanne E. Stewart, Vice Chair
Clark County Washington