

March 13, 2008

Gail Achterman, Chair  
Oregon Transportation Commission  
355 Capitol Street NE, Room 135  
Salem, OR 97301

Dear Chair Achterman –

The Central Lane Metropolitan Planning Organization (CLMPO) appreciates this opportunity to comment on the draft Oregon Transportation Commission (OTC) Policy on Project Earmark Requests.

The first concern of note is that nowhere in this proposed policy does the OTC appear to take input from the six federally designated Metropolitan Planning Organizations (MPOs) in Oregon. The MPOs set the transportation agenda for the six largest metropolitan areas in the state, including setting project and planning priorities and approving the Regional Transportation Plans (RTP) and Metropolitan Transportation Improvement Programs (MTIP). It is the MTIP that programs all transportation projects utilizing federal funds within an MPO, which the Statewide Transportation Improvement Program (STIP) must reflect without modification. As such, it only makes sense that the OTC would both request and respect MPO input on major funding strategies like federal earmarking.

The second comment relates to the problematic language that defers to ODOT region management the decision whether or not to count an earmark (local agency or otherwise) as a local contribution to a state system project under the Infrastructure Cost Sharing policy. This appears vague and arbitrary and sets no clear and objective criteria for when, why and how an earmark can be considered as local match.

Local jurisdictions typically expend staff time, political capital and other valuable resources in advocating for an earmark when that earmark is also on the state's list. In fact, local advocacy for an earmark can be the determining factor on whether or not that earmark is authorized in the federal budget. We respectfully submit that any earmark, state system or otherwise, that goes to a project that either is on or benefits the state system must be allowed to count as local match as a matter of course. At a minimum please give due consideration to striking the last paragraph on page 3 of 3 of the Draft Policy. The discussion about whether or not to count earmarks should occur with your local partners under the needed review of the cost sharing policy and its consistent implementation statewide.

The grim reality is that all local governments in Oregon are experiencing financial hardship with respect to making important transportation improvements, as well as maintaining and preserving the existing system. This is why earmarks are considered and pursued. We believe ODOT should be rewarding and leveraging local agency energy in securing federal earmarks and that the Draft Policy should reflect this collaboration.

Sincerely,

Sid Leiken, Chair  
Metropolitan Policy Committee

cc: Sonny Chickering  
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