



January 27, 2012

Thank you for your continued efforts to enact a multi-year surface transportation authorization bill. The surface transportation authorization bill is a top priority for the United States in order to both rebuild and improve the nation's crumbling infrastructure, and to revitalize a stagnant economy. With unemployment remaining high, dedicated and certain funding of surface transportation is critical to addressing these needs.

The Association of Metropolitan Planning Organizations (AMPO) writes regarding our serious concern about the future of smaller metropolitan planning organizations (MPOs). AMPO represents MPOs across the United States, of which there are 383 ranging in population size of 50,000 to several million as designated under U.S. Code Title 23, Chapter 1, Section 134. The American Public Transportation Association (APTA) joins AMPO in these concerns regarding the future of small MPOs. APTA's membership includes numerous transit agencies serving communities in small urbanized areas. The nation's small public transportation agencies value and rely on their relationship with their local/regional MPOs.

With the release of Moving Ahead for Progress in the 21st Century (MAP-21) and other upcoming surface transportation legislation, we would like to emphasize our joint recommendation to **retain all existing MPOs under 200,000 in population**, regardless of any new MPO threshold designation changes that may be included. While we agree that certain changes in law may be needed to improve the planning process, all existing small MPOs must remain in operation to continue their critical roles in decision-making.

- **Local elected officials are the MPO.** Removing the decision-making authority from the local level will reduce the voice of the local government, transit agencies, its citizens, and people in the region. Citizens elect their local public officials to reflect the unique nature of their region, and removing the MPO will only increase the distance between the average citizen and the policy-maker.
- **MAP-21 raises the designation for MPOs from 50,000 to 200,000 in population.** Instead of preserving the existence of long-established smaller MPOs, MAP-21 requires they receive approval from the Secretary that they possess the technical capacity to complete the planning requirements. With the possible elimination of MPOs in areas with populations lower than 200,000, 8 states potentially *will not have a MPO*. In all, the 200,000 threshold would endanger approximately 230 of the 383 MPOs, some of which have existed since 1962. Decades of an open table for the operators, public transit agencies, state officials, local electeds, and citizens will disappear.

- With current economic realities, **transportation decisions that MPOs make are critical to economic growth**, our citizens, and the nation's financial engines, which are tied to metropolitan regions of *all sizes*. Given the importance of transportation infrastructure to economic growth, security, and sustainability, MPOs are an inextricable part of the U.S. economy.
- For small to mid-sized transit agencies, the current role of small MPOs has made a significant difference in representing transit services and investment needs in the planning process.

MPOs contain policy boards comprised of local elected officials, representatives of public agencies that administer or operate transportation modes, and state officials. The boards are responsible for carrying out federally required transportation planning activities that include, but are not limited to, development of long-term multimodal transportation plans, coordinated selection of transportation improvements in a fiscally constrained manner, public outreach, and coordination with states, public transit agencies, and numerous public and citizen interests.

AMPO provided Congress with legislative language that would grandfather existing MPOs from designation changes. APTA and its small operators support AMPO's legislative goal of grandfathering existing MPOs from these changes. If you would like to receive a copy of this draft legislative provision, please feel free to contact DeLania Hardy, Executive Director, Association of Metropolitan Planning Organizations at 202-296-7051, or [dhardy@ampo.org](mailto:dhardy@ampo.org). Questions regarding APTA's views on this matter can be directed to Brian Tynan, APTA Government Affairs, at 202-496-4897 or [btynan@apta.com](mailto:btynan@apta.com). Thank you for your time and consideration of this important issue.

The following signatories support AMPO's position on grandfathering existing MPOs:

Sincerely,



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Updated 3/8/12

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