

February 27, 2023

Senator Christine Cohen, Co-Chair  
Representative Roland Lemar, Co-Chair  
Transportation Committee  
Legislative Office Building, Room 2300  
Hartford, CT 06106

**RE: HB 6670 AN ACT STUDYING THE CONSOLIDATION OF METROPOLITAN PLANNING ORGANIZATIONS**

Dear Co-Chairs Cohen and Lemar, Ranking Members, and Committee Members:

The Executive Directors, representing the state's eight Metropolitan Planning Organizations (MPOs), thank your Committee for the opportunity to provide comments on HB 6670. The bill, whose stated intent is to explore the consolidation of MPOs in the Connecticut, indicates that the current structure is not compatible with an effective or efficient transportation planning process. The bill and accompanying fact sheet imply that increasing the population base of Connecticut's MPO would alleviate perceived inefficiencies and improve performance and consistency in the transportation planning process. It assumes that the number of persons who reside within the boundaries of an MPO is the determining factor for an efficient and effective transportation planning process.

MPOs in Connecticut have been responsible for the federal metropolitan transportation planning process since enactment of Federal-Aid Highway Act of 1973 and have done so in accordance with federal planning regulations and requirements. All MPOs, not just those in Connecticut, are subject to federal oversight and regular, comprehensive reviews that certify each MPO's transportation planning process is conducted in conformance with federal regulations. These certification reviews have not identified any systemic problems with the performance or consistency of the transportation planning process in Connecticut. The MPOs, have been, and are responsible for assessing the transportation deficiencies and issues facing our member municipalities and have been successful in selecting and programming transportation improvement projects that addresses these problems.

The MPO process was created in federal law to ensure the funding programs managed by the U.S. Department of Transportation are administered in cooperation with local, regional, and state partners and address local and regional priorities and needs. The process is explicitly intended to ensure that community stakeholders are engaged, and local governments actively guide the development of transportation projects in their jurisdictions. The process is purposely designed to be partnership between the USDOT, state DOTs, MPOs, local governments, and the public.

It is important to understand that larger MPOs dilute the opportunity of all communities and the public to participate in the planning process, and that this can be detrimental to the functioning of an MPO. Today, MPOs in Connecticut operate by consensus, with few if any disagreements; however, this was not always so. In the 1970s and early 1980s, the Connecticut joined the Tri-State Planning Commission with New York and New Jersey. This structure proved to be unworkably large, breaking down under internal disagreements, and was dissolved and replaced with MPOs that were more responsive to the needs of their respective areas.

Federal regulations recognize this issue and vest the determination of appropriate structure of an MPO with local elected officials. Federal law sets the minimum population of an MPO at 50,000 persons, meaning smaller MPOs are not only permissible but supported by Congress. Efficiency and effectiveness are required elements of the federal transportation planning process. Regardless of resident population, MPOs must be efficient and effective if they are to maintain their federal certification.

Both now and historically, the MPOs in Connecticut work together on all aspects of the transportation planning process. These include extensive formal collaboration on the development of short- and long-term plans, studies, project selection and programming under federal programs, management processes (e.g., congestion, transportation modeling, air quality), as well as frequent informal cooperation. Coordination among MPOs in Connecticut is in many cases superior to that of MPOs in other states.

In addition, Bill 6670 raises several concerns:

1. Preemption of federal law. Creation or modification of an MPO is governed by federal law, which reserves to local chief elected officials the power to structure or restructure an MPO.
2. Inconsistency with Congressional intent. Federal law guarantees self-determination of MPOs and protects MPO functions with respect to oversight of state Departments of Transportation and the MPO role in providing full community representation and equity in the transportation planning process.
3. Misunderstanding the purpose and function of MPOs. A principal function of MPOs is to act as a check and balance on state actions. The MPO process has been effective in preventing the types of adverse community impacts that defined many transportation projects in the pre-MPO era. MPOs, which are federally mandated to carry out extensive public involvement, exist to ensure that every person and every community has a voice in the transportation planning process.
4. Misunderstanding about Connecticut's MPOs relative to other states throughout the country. With respect to population, MPOs in Connecticut are typical by national standards. The average number of MPOs in a state is eight. Connecticut has eight MPOs designated. The average population served by an MPO is about 230,000 persons. The average size of Connecticut MPOs is about 424,800 in population, almost double of the national average.
5. An idea that transportation planning in Connecticut is inefficient and not effective. MPOs in Connecticut conduct transportation planning in accordance with federal regulations and must adhere to planning requirements that may lengthen the process but are necessary to inform the public and ensure transparency. The MPOs also work closely with each other as well as with state and federal partners. This coordination is essential in advancing transportation actions as quickly as possible. Connecticut has been aggressive in advancing transportation projects and fully obligating available federal transportation funds. This success would not have been possible without the active participation of the MPOs and continual collaboration with CT DOT. In addition, the MPOs have been successful in securing discretionary federal funding for member municipalities as well as the CTDOT under the Infrastructure Investment and Jobs Act.

Given our proximity to the New York City metropolitan area, Connecticut MPOs also coordinate transportation planning with the New York Metropolitan Transportation Council (NYMTC) and

North Jersey Transportation Planning Authority (NJTPA) through the Metropolitan Area Planning (MAP) Forum, which brings together MPOs in the four-state New York City metropolitan area.

6. Lack of consideration of existing initiatives. In 2022, Connecticut COGs/MPOs and CTDOT jointly launched a LEAN partnership to identify and take advantage of opportunities to enhance transportation planning, programming, and project delivery. This process was highly productive and resulted in positive changes in the way we advance plans and projects. This is a continuing effort and would be a more appropriate forum to discuss the feasibility and effectiveness of MPO structure than through a legislative mandate that excludes MPO participation.
7. Adverse impacts on planning. MPOs by definition are transportation planning organizations, but most MPOs nationwide are not freestanding entities with a single focus but are hosted by a multifunctional planning agency such as a Council of Governments or county. This allows planners to consider critical linkages between transportation and land use, the environment, the economy, and housing. This interdisciplinary approach improves the effectiveness of planning and is vital to projects that involve multiple disciplines (e.g., transit-oriented development, which melds transportation with land use, economic development, and housing). Interdisciplinary planning works best when boundaries for various planning disciplines align and, ideally, are vested in the same agency. In recent years, the General Assembly, Governor's office, OPM, and the COGs have transformed the state's planning agencies into interdisciplinary organizations that synergistically integrate land use planning (COG), transportation planning (USDOT-designated MPO), economic development planning (EDA-designated EDD), and data (Census-recognized county equivalent).

For these reasons it is unclear why legislation is required to address the perceived issues expressed in Bill 6670. If there is a need or desire to evaluate consistency and efficiency in transportation planning, the lean process launched by the Connecticut Department of Transportation and the MPOs last summer provides an ideal framework to raise and address such issues, and the Executive Directors would be happy to include such an evaluation to the agenda for a future meeting.

Should your Committee wish to direct the Advisory Commission on Intergovernmental Relations to undertake a study, the Executive Directors would suggest that you consider the funding, rather than the planning, of transportation and, in general, infrastructure projects. The limiting factor for the improvement of transportation and infrastructure in Connecticut is not a lack of plans at the state, regional, or local level, but rather the ability or inability to obtain funding to implement any of those plans. While state agencies, the COGs, and local governments are aggressively pursuing new funding under the Infrastructure Investment and Jobs Act and Inflation Reduction Act, grants under these programs may not change the state's longstanding balance of payments position, where it has the lowest per capita return on its federal tax dollars of any state. As an intergovernmental question between Connecticut and the federal government, it may be a good subject for closer study by ACIR. The Executive Directors have researched this matter in the past and would be able to make themselves available to ACIR for such an inquiry.

Should you have questions, please do not hesitate to contact us.

Thank you for your consideration.

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