



ASSOCIATION OF  
METROPOLITAN  
PLANNING  
ORGANIZATIONS

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Office of Management and Budget

Comment: Doc. 2021-00988  
Recommendations from the Metropolitan and Micropolitan Statistical Area Standards Review Committee to the Office of Management and Budget Concerning Changes to the 2010 Standards for Delineating Metropolitan and Micropolitan Statistical Areas

Acting Director Rob Fairweather  
Office of Management and Budget  
725 17th Street NW  
Washington, D.C. 20503

Dear Acting Director Fairweather:

The Association of Metropolitan Planning Organizations (AMPO) is pleased to submit these comments to the Office of Management and Budget (OMB) as it reviews comments to the recommendations received from the Metropolitan and Micropolitan Statistical Area Standards Review Committee for changes to OMB's metropolitan and micropolitan statistical area standards.

AMPO is a nonprofit, membership organization established in 1994 to serve the needs and interests of metropolitan planning organizations (MPOs) nationwide. Federal highway and transit statutes require, as a condition for spending federal highway or transit funds in urbanized areas, the designation of MPOs, which have responsibility for planning, programming, and coordination of federal highway and transit investments. Under federal law MPOs are designated for each urbanized area with a population of more than 50,000 individuals.

Our first comment focuses on the review committee's first recommendation in their report to OMB, "(1) *The minimum urban area population to qualify a metropolitan statistical area should be increased from 50,000 to 100,000.*" AMPO received inquiries from many its members asking if this recommendation would impact the future designation of MPOs or if it would cause existing MPOs under 100,000 in population to be de-designated. After communication with the review committee

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as well as with the Bureau of the Census we were informed that increasing the minimum urban area population to qualify as an MSA to 100,000 would not impact existing or future designations of MPOs. AMPO recommends that the review committee, OMB, and the Bureau of the Census confirm that recommendation (1) will not reduce the number of existing MPOs and will not impact future MPO designations that are consistent with 23USC Section 134.

AMPO is concerned the justification for the proposed MSA population threshold change lacks a sound reason other than – *“In reviewing the 2010 standards, the committee noted that the minimum population required for an urban area to qualify a metropolitan statistical area had not kept pace with population growth of the United States. They observed that the population of the United States had more than doubled since the 1950 census (the population in 2019 is about 2.2 times larger than in 1950), while the standards have maintained the same minimum population. Thus, the committee recommends doubling the minimum required population of an urban area to qualify a metropolitan statistical area from 50,000 to 100,000.”* This does not appear to be a scientific methodology for making such a significant change. Is there further information or committee discussion of whether this change makes MSA data more statistically useful?

As you may know, through the planning process, MPOs play a significant role in how transportation investments and improvements affect the population and businesses in metropolitan planning areas. Additionally, some MPOs are responsible for providing transportation services funded by other federal agencies. For instance, Community Development Block Grants (CDBG) provided by the US Department of Housing and Urban Development (HUD) fund transportation services that comply with the regulations and statutes. Several of our members are at risk of losing these entitlement funds if the MSA population threshold is increased to 100,000 from 50,000. The loss of these funds could jeopardize essential transportation services for some of the most vulnerable and historically marginalized sectors of the population and we would recommend that OMB take this into consideration when reviewing these recommendations.

AMPO appreciates the opportunity to provide comments on the Metropolitan and Micropolitan Statistical Area Standards Review Committee proposal for changes to OMB’s metropolitan and micropolitan statistical area standards. Without a more detailed explanation for why this change is needed and given the potential harm that this change could cause to these communities, especially those that are disproportionately underserved, AMPO would *recommend that OMB not accept the recommendation of the review committee on increasing the population threshold from 50,000 to 100,000*. If you have any questions or would like to further discuss AMPO’s comments, please contact Caitlin Cook, AMPO Technical Programs Director or Bill Keyrouze, AMPO Executive Director at 202-624-3680.

Sincerely,



William Keyrouze  
Executive Director

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