



To: Brendan Sharkey, Chair, Advisory Commission on Intergovernmental Relations (ACIR)  
John Filchak, Vice-Chair, ACIR  
ACIR Commission Members

From: Betsy Gara, Executive Director, Connecticut Council of Small Towns

Date: November 30, 2023

Re: ACIR Study – Metropolitan Planning Organizations

The Connecticut Council of Small Towns (COST), which represents 115 municipalities from throughout Connecticut, respectfully submits the following comments relative to the study of issues relating to the consolidation of Metropolitan Planning Organizations (MPOs) undertaken by ACIR pursuant to Special Act 23-13.

Although COST supports efforts to improve the efficiency of transportation planning processes, previous efforts to consolidate MPOs would have negatively impacted the state's smaller communities. As such, COST has a tremendous stake in ensuring that the study fully considers the impact of any recommendations on transportation planning in the state's small towns.

Unfortunately, however, two of COST's appointments to ACIR have been awaiting approval for several months. This undermines our ability to provide input on issues relating to the consolidation of MPOs and its impact on transportation planning in small towns.

COST is very concerned that efforts to consolidate MPOs to serve larger populations will undermine the opportunity of municipalities, particularly small towns and their residents, to participate in the planning process and reach consensus on critical transportation policies. This would fundamentally undermine the current MPO structure, which is working well and is responsive to the needs of the communities served.

In addition, COST respectfully requests ACIR to consider the following points:

■ **Consolidation would usurp local authority over MPO structures.**

COST is concerned that MPO consolidation would usurp the authority of Connecticut's local elected officials to determine how planning regions should be configured to best align with state, regional and local planning goals. This contradicts the stated goal in creating MPOs in the first place - to ensure *local* input in transportation planning.



■ **Consolidation would undermine transportation planning for rural and suburban towns.**

Consolidating MPOs to serve larger population thresholds would severely undermine the ability of COGs serving predominantly rural and suburban areas to provide transportation planning services to these communities. This would result in significantly larger planning regions, leaving small towns without a voice in the process.

■ **Consolidation would impose unnecessary costs on the Councils of Government.**

Requiring MPOs to merge and reorganize would involve significant costs and resources. This would undermine transportation planning as well as other regional programs administered by the COGs.

COST also concurs with several of the points made in the memo submitted to ACIR from the four ACIR members who also serve as executive directors of the five of the state's MPOs, as follows:

- 1) The establishment of population thresholds for MPOs is governed by federal law and states do not have the authority to establish different population thresholds. Moreover, Connecticut's MPO population thresholds are considered typical in relation to other states, as indicated in the presentations provided at the November 14 meeting.
- 2) Mergers or consolidations of MPOs would prove counterproductive at this time, particularly in the absence of any compelling reason for such consolidation.
- 3) Connecticut's existing structure in which MPOs are hosted by the Councils of Government provides a comprehensive and beneficial framework for approaching issues relating to transportation planning, land use, economic development, housing, environmental, and community planning.

Thank you for the opportunity to comment on issues relating to the consolidation of MPOs.

Sincerely,

*Betsy Gara*

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