

# MPO Consolidation

## Progress Report to CT General Assembly

& the Commission on Municipal Opportunities Regional Efficiencies

*Final 2014-12-31*

Connecticut's structure for metropolitan planning organizations (MPOs) is based on regional planning organizations (RPOs) that were established in the 1950s and 1960s. While 15 planning regions might have been a suitable framework for regional planning functions of the time, the RPOs are now too small and inefficient to effectively fulfill the important responsibilities and complex transportation planning functions required by federal law. The recently passed federal transportation authorization act (MAP-21 or Moving Ahead for Progress in the 21<sup>st</sup> Century) adds responsibilities, and requires even greater technical capabilities. With one or two exceptions, Connecticut's MPOs are undersized, and lack the staff and technical resources to function as full and strong partners with the Connecticut Department of Transportation (CT DOT) in managing the federal funding programs within their own metropolitan areas.

The primary rationale for consolidating MPOs is to create more effective and efficient organizations that are fully capable of carrying out all the responsibilities of MPOs. The other key objective of consolidation process is to create an MPO structure and/or inter-MPO agreements that ensure transportation planning is not fragmented into small regions. The goals of MPO consolidation are to:

1. create stronger and more capable MPOs that are effective partners with CT DOT to manage our state's transportation system.
2. create a transportation planning process that is comprehensive and cohesive across large metropolitan areas and major travel corridors.

*Purpose of Report.* This report presents a status report on efforts to develop options for consolidating regions for transportation planning purposes. This work follows the prior work by the Office of Policy and Management (OPM) to re-designate the boundaries of planning regions for broader regional planning and service delivery purposes.

The two initiatives are driven by separate purposes and are guided by separate laws and regulations.

1. **OPM re-designation of the boundaries of planning regions (state law).** The OPM initiative was required by state statute that called for a recurring 20-year analysis of the boundaries of logical planning regions and subsequent re-designation of such boundaries. A separate state statute also required that each planning region be re-organized as a council of governments (COG), if they were not already a COG, by January 1, 2015. (see Appendix 1 for more background)

OPM's action to re-designate the boundaries of planning regions was completed by early 2014. The resulting nine regions have since taken the necessary steps to become COGs. Figure 1 is a map that shows the new COG boundaries.

2. **Consolidation of MPOs (federal law).** This effort is in response to MAP21 requirements, and would consolidate regions to improve transportation planning functions. The MPO consolidation initiative is governed by federal laws and regulations that require the establishment of MPOs. Congress authorized MPOs in order to provide local elected officials with a role in transportation planning and decision-making regarding the expenditure of federal transportation funds in their metropolitan area.

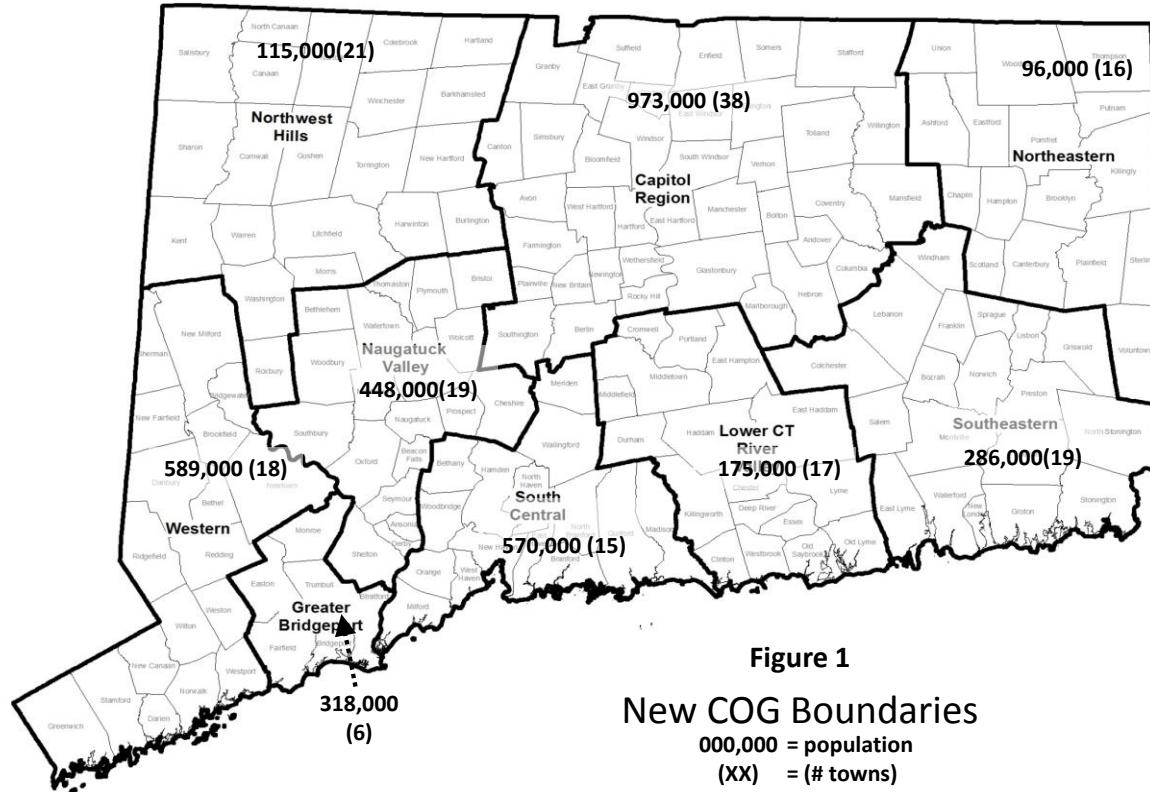


Figure 1

## New COG Boundaries

000,000 = population

(XX) = (# towns)

The effort to consolidate MPOs was started after the completion of OPM's re-designation of the boundaries of planning regions. The MPO consolidation initiative is still underway. Unlike the OPM action in which state statutes mandated the re-designation process, the MPO consolidation effort must be based on voluntary consolidation. Federal laws require that the chief elected officials representing 75% of the population in an MPO approve any re-designation of MPO boundaries. The 75% must include the largest city. (See Appendix 2 for federal requirements regarding MPO consolidation & Appendix 3 for related state legislative directives.)

Report Organization. The report is organized into four sections plus an appendix.

- A. Approach to MPO Consolidation
- B. Status & Outcomes of Consultations
- C. Funding for MPOs
- D. MPO Staffing Needs: Providing Adequate Staff Size & Expertise

### Appendices:

1. State Legislative Background on "Planning Region" (COG) Consolidation
2. Federal Requirements & Process for MPO Redesignation & Consolidation
3. State Legislative Background on "MPO" Consolidation
4. General Process & Timeline for MPO Consolidation

## ***A. Approach to MPO Consolidation***

The nine new planning regions established by OPM through the authority of Public Act 13-247 could provide the framework and basis for a reduction in the number of MPOs. The approach to achieving MPO consolidation is based the following goals and principles.

- 1. Consolidate MPOs to meet key mandates of MAP21.**
- 2. Respect the new COG organizations.**
- 3. Consult directly with existing MPOs & seek solutions acceptable to the COGs.**
  - The voluntary approach is consistent with federal laws that require any redesignation of an MPO to be approved by chief elected officials representing at least 75% of the *existing* MPO's population. The chief elected official of the MPO largest city must be one of those who support redesignation.
  - The Governor must also approve redesignation, but he cannot unilaterally take action, and must have the support of the *existing* MPO as described above.

A diagram illustrating general steps and timelines for the consultation process is provided in Appendix 4.

**Consultations with MPOs & COGs.** A series of meetings and consultations were held with each existing MPO to gather their thoughts and opinions on possible MPO redesignation. The initial meetings occurred with individual MPOs or groupings of MPOs. Participants included the executive directors and staff for the respective MPOs, CTDOT staff, and representatives from the Federal Highway Administration (FHWA). In some cases, the meetings included MPO board members as well.

Each *initial* meeting included an overview of the federal MPO redesignation process (see Appendix 4 for more information), an overview of expectations for the process (including long-term consolidation goals and short-term transition steps required), and the federal redesignation process was explained by FHWA.

**Short-term transition is priority.** All parties agreed that the redesignation of MPOs will not occur as quickly as the formation of new COGs. This creates a need to provide for interim measures to maintain key MPO functions during the transition period. Providing for continuity of MPO business during the transition is a high priority that must be resolved quickly. Failure to do so can jeopardize federal funding and adversely impact project schedules and cost. For some MPOs, implementing the appropriate transition measures is requiring substantial time and effort of MPO staff and CT DOT staff.

**Continuing discussions.** Beyond the initial meetings with MPOs, CT DOT held many follow-up meetings and phone conversations to explore options in more detail. Those discussions are continuing.

## ***B. Status of Consultations with COGs***

Many MPO officials recognize the merits of consolidation. However, there are concerns that attempting to implement changes to MPO structures while some COGs are still in the process of re-organizing their administrative functions could complicate both efforts.

Provided below is a summary of the status of COG and MPO consolidation.

### **Disbanded Regions: Windham COG & Central CT RPA**

As a result of OPM's re-designation of planning regions, the Windham and Central Connecticut regions were disbanded, with the member municipalities being re-designated to neighboring planning regions.

**Windham COG.** Windham COG officially disbanded effective July 1, 2014, and each of its 9 former member towns were eligible to join one of the following COGs: Capitol Region COG, Southeastern CT COG, or Northeastern CT COG. Since Windham COG was considered a rural COG, it did not qualify as an MPO. As such, there is no need to make special arrangements to continue MPO functions during the interim or transition period.

**Central CT RPA.** Central CT RPA officially disbanded effective December 31, 2014. Each of the 7 former member towns were eligible to join one of the following COGs: Capitol Region COG, Naugatuck Valley COG, or Northwest Hills COG. CCRPA is an MPO so there was a need to make special arrangements to continue MPO functions during the interim or transition period. CT DOT met several times with CCRPA and adjoining COGs to make suitable arrangements to continue MPO functions. Those functions will be continued through the Capitol Region COG acting as 'host' for the MPO until such time as the MPO consolidation process is completed, and new MPO boundaries are defined and approved.

### **Rural COGs: Northwest Hills COG & Northeastern CT COG**

These two regions are considered rural by state and federal standards. Discussions were held with officials from the rural COGs regarding the advantages and disadvantages of a rural COG becoming part of an adjoining MPO.

Based on the discussions and CT DOT's assessment of the level of technical support each rural COG requires from CT DOT, it was decided that the two rural COGs should remain separate from any MPO. The federal transportation planning requirements for rural areas are much less demanding than they are for metropolitan areas or MPOs. As a result, rural COGs do not need a large transportation staff with specialized skills. Likewise, the rural COGs do not need a lot of administrative and technical support from CT DOT. For these reasons, the two rural regions do not need to be incorporated into an MPO.

**Northwest Hills COG.** Upon re-designation of their planning regions by OPM through the voluntary merger provision of state statutes, the Litchfield Hills CEO and the Northwestern CT COG formed a single COG now called Northwest Hills COG. The consolidated COG is still classified as rural, and will function as the responsible rural transportation planning agency for this part of the state. It has added one additional town as the town of Burlington requested to join Northwest Hills when the Central CT RPA disbanded.

**Northeastern CT COG.** The Northeastern CT COG will remain as a separate COG and will continue to function as the responsible rural transportation planning agency for this part of the state. It has added three new towns from the Windham COG that has disbanded. It has also added one town from Southeastern CT COG that requested to change its regional affiliation.

### **Southeastern CT Council of Governments**

*(19 municipalities; 286,000 population)*

The Southeastern CT COG already exists and functions as the MPO. The new regional boundaries defined by OPM resulted in only minor changes to this planning region. The towns of Windham and Lebanon were re-designated by OPM from the Windham planning region to the Southeastern CT

planning region, while the town of Voluntown asked to be re-designated from the Southeastern CT planning region to the Northeastern CT planning region. These changes were approved by OPM and more recently by the policy board of the Southeastern CT COG.

Two primary options were discussed with Southeastern CT officials: (1) the option of having Southeastern CT COG become part of a larger consolidated MPO, and (2) the option of Southeastern CT COG remaining an independent MPO. Regional officials expressed a preference for remaining an independent MPO. However, the disadvantage of Southeastern COG functioning as an independent MPO is that its urban population is relatively small, which means that it receives relatively few MPO planning funds. Limited planning funds will restrict the ability of Southeastern COG to fully develop the staff resources it might need.

### **Capitol Region Council of Governments**

*(38 municipalities; 973,000 population)*

The Capitol Region COG serves as the MPO for its member communities. It is currently the largest COG & MPO in the state, and will expand moderately with the new regional planning boundaries defined by OPM. Eight municipalities have been added to the existing 30 CRCOG members. The eight new members are: Mansfield, Willington, Coventry and Columbia from the Windham COG; and New Britain, Berlin, Southington and Plainville from the Central CT Regional Planning Agency. Both Windham COG and CCRPA are disbanded as a result of OPM's re-designation of the boundaries of planning regions.

The expanded CRCOG includes 38 municipalities and a population of 973,000. The size and scale of CRCOG give it the resources and geographic scale to function as an MPO. Further consolidation might yield additional benefits.

### **South Central Regional COG (SCRCOG) & Lower CT River Valley COG (River COG)**

*(15 municipalities, 570,000 population)      (17 municipalities, 175,000 population)*

South Central COG and River COG are both part of the New Haven urbanized area. Both currently function in the dual roles of COGs and MPOs for their respective regions.

Neither South Central COG nor River COG was affected by OPM's re-designation of the boundaries of planning regions. River COG was exempt from COG consolidation since they recently completed a merger of two smaller regions (Midstate RPA & Connecticut River Estuary RPA) into a new 17-member region with a population of 175,000. SCRCOG was already relatively large with 15 member municipalities and a population of 570,000.

CT DOT met with both South Central COG and River COG to discuss options for consolidation.

During discussions with the two regions, staff of both agencies expressed reservations about consolidation. Concern was expressed that MPO consolidation at this time would cause even more disruption following their recently completed merger of Midstate RPA and Connecticut River Estuary RPA.

No consolidation option was identified that is currently acceptable to the two COGs. Since no conclusion was reached, evaluation of consolidation options needs to continue and expand to include additional options.

**Naugatuck Valley COG:** merger of [COG of Central Naugatuck Valley \(COGCNV\)](#) & [Valley COG](#)  
(19 municipalities, 448,000 population)

COGCNV and Valley COG jointly requested a voluntary merger of their respective planning regions and, after re-designation by OPM, took the necessary steps to create the new Naugatuck Valley COG. Additionally, two municipalities from the disbanded Central CT RPA (Bristol and Plymouth) were re-designated by OPM and have joined the Naugatuck Valley COG. The new COG includes 19 municipalities with a total population of 448,000. The largest city is Waterbury (pop = 110,400). The COG also includes the city of Bristol (pop = 60,500)

With 19 municipalities and population of 448,000 Naugatuck Valley could gain some advantages by affiliating with other adjacent COGs to organize a larger MPO. Creating a larger MPO could achieve more cohesive transportation planning within the larger economic region and key travel corridors. Discussions on the most effective MPO structure for Naugatuck Valley COG and neighboring COGs need to continue.

**Greater Bridgeport COG**  
(6 municipalities, 318,000 population)

The Greater Bridgeport COG was not affected by OPM's re-designation of the boundaries of planning regions and includes only 6 municipalities: the city of Bridgeport and five surrounding towns. Although Bridgeport is the state's largest city, the Greater Bridgeport Regional Council is the smallest COG in terms of geographic size and number of member communities. It is also relatively small in terms of population with only 318,000 residents.

To achieve meaningful and cohesive transportation planning, this COG needs to be integrated with a larger region that encompasses the sections of Connecticut that have strong economic and transportation ties to New York. Various options were explored during discussions with regional officials, and also among regional officials themselves.

No conclusions have been reached regarding the most appropriate MPO boundaries. Evaluation of options needs to continue.

**Western CT COG:** merger of [South Western RPA](#) & [Housatonic Valley Council of Elected Officials](#)  
(18 municipalities, 589,000 population)

The Southwestern RPA and the Housatonic Valley CEO jointly requested a voluntary merger of their respective planning regions and, after re-designation by OPM, took the necessary steps to create the new Western CT Council of Governments.

In discussions with officials of the two agencies, they originally expressed a preference that the Western CT COG also be designated as the new consolidated MPO. More recently, the City of Stamford expressed a desire to see the MPO boundaries expanded and oriented along the main New Haven Rail Line and I-95 corridor. The rationale for the eastward extension is to create an MPO that is aligned with the major east-west travel corridor that includes the New Haven Line, I-95, and the Merritt Parkway. No conclusions have been reached regarding the most appropriate MPO consolidation. Since no conclusion was reached, evaluation of consolidation options needs to continue.

### ***C. Funding for MPOs***

Funding resources for MPOs consist of two general types: (1) Planning Funds: funding that the MPO needs to operate its own organization and conduct transportation planning activities, and (2) Project Funds: funding for transportation capital improvement projects that the MPO allocates, prioritizes, and programs for transportation improvements within its own region. Each category is explained below.

#### **1. Planning Funds:**

The federal government makes special funding available specifically for metropolitan transportation planning purposes. These funds are intended to support the planning functions of MPOs and are directed to the MPOs. They are the primary funds used by MPOs to fund staff salaries and conduct virtually all transportation planning functions.

The transportation planning funds available to each of the new COGs are shown in Table 1 below. The amounts shown in Table 1 combine planning funds from two federal agencies: the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA). Highway planning funds from FHWA are referred to as FHWA PL funds, while the transit planning funds from FTA are referred to as FTA 5307 funds. Since CTDOT administers both funding programs funds under a single contract with each MPO, only the combined amounts of FHWA PL and FTA 5307 funds are shown in Table 1. For purposes of the financial section of this report, it was assumed that each COG would function as an independent MPO or be the host of multiple MPOs so the funding estimates are subject to change as MPO consolidation continues to be evaluated. Changes also might occur if allocation formulas are adjusted.

The amounts in Table 1 include the federal funds (80%) plus the non-federal match (20%). Typically, the CT DOT provides a 10% match and the MPO provides the final 10% match. The funds flow through CT DOT, which is responsible for administering the funding contracts and processing invoices for reimbursement of MPO expenses. The current formula used for this financial section is being reviewed and evaluated by the CT DOT, FHWA, FTA and the MPOs and may change after this report is finalized.

Planning Funds for Rural COGs. The two rural COGs are not eligible for MPO planning funds. However, CT DOT makes other federal funding available to support small transportation planning programs at each rural COG. Those amounts are shown at the bottom of Table 1. As with the MPO planning funds, the amounts shown in Table 1 are the combined totals of federal funds (80%) plus state match (10%) and local match (10%).

OPM's SGIA Funds. The amount of State Grant In Aid (SGIA) funds available to each COG is also provided in Table 1. These funds are not for transportation planning, but they do support all the other planning and service functions that a COG might perform for their member communities.

Table 1

COG	POP-ULATION	# OF TOWNS	PLANNING AND OPERATIONS		PROJECT	
			TRANSPORT. PLANNING	OPM (SGIA)	LOTCIP	
<b><i>Urban</i></b>						
Capitol Region	973,959	38	\$1,978,990	\$611,980	\$12,577,050	
Western	589,135	18	\$1,197,216	\$544,568	\$7,829,100	
South Central	570,001	15	\$1,174,349	\$410,001	\$7,938,000	
Naugatuck Valley	448,738	19	\$923,215	\$474,369	\$6,005,250	
Greater Bridgeport	318,004	6	\$661,893	\$284,002	\$4,449,600	
Southeastern	286,711	19	\$575,345	\$268,356	\$3,159,900	
Lower CT River	175,685	17	\$354,995	\$337,843	\$1,833,750	
<b><i>Rural</i></b>						
Northwest Hills	115,247	21	\$176,250	\$307,624	\$680,850	
Northeastern	96,617	16	\$176,250	\$173,309	\$526,500	
State Totals	3,574,097	169	7,218,503	3,412,052	\$45,000,000	

## 2. Project Funds: LOTCIP & various federal programs

Project funding refers to federal and state programs that provide funds to design and construct transportation projects. Only the state funded LOTCIP program (Local Transportation Capital Improvement Program) is shown in Table 1, but relevant federal programs are described below as is the LOTCIP program.

**State LOTCIP.** The Local Transportation Capital Improvement Program (LOTCIP) is 100 percent state-funded. It was developed to provide state monies for municipal roadway projects ***in lieu of federal STP Urban funds.*** This program is established with substantially fewer constraints and requirements that currently exist when using federal STP Urban funds. Approximately **\$45 million dollars** is allocated for this program on an annual basis.

Funds are distributed to each COG based on the urban population in that COG, and the COG is fully responsible for project selection and program management. The COG and/or municipality is responsible for project delivery, which includes project design, cost control, and construction. The LOTCIP program is a ‘capital improvement’ program, and is not intended for maintenance-type roadway work.

**Federal STP Urban.** The STP Urban program is a federal program that provides funding for roadway improvement projects in urban areas. The funds can be used on either state or municipal roads that are designated as part of the federal-aid eligible network. The statewide total for this program is about **\$53 million** (federal). Under federal law, these funds are allocated to metropolitan areas based on urban population, and MPOs play an important role in project selection.

Historically, MPOs were responsible for project selection, but the responsibility for designing and delivering the projects most often fell to CT DOT because the MPOs did not have the staff resources and capabilities to manage federal projects. Recently, Connecticut’s STP Urban program was largely replaced by the state-funded LOTCIP program (see section above). Now the STP Urban program is largely restricted to state roadways, and the LOTCIP funds are used to finance projects on municipal roadways. MPOs still have a role in STP Urban funding decisions, but it is done as part of the annual development of CT DOT’s 5-year capital plan.

The replacement of the STP Urban program with the LOTCIP program gives MPOs/COGs full control over a new major funding program that is unencumbered by strict federal and state requirements regarding project design, construction, and reporting. It is expected that the LOTCIP program will reduce both the time and cost of doing projects as compared to the STP Urban program.

**Federal Transportation Alternatives.** This is a smaller program. About **\$3.8 million** (federal) is made available every year to MPOs statewide. It is intended for projects that support alternative modes of transportation – primarily walking and bicycling. CT DOT typically supplements the \$3.8 million of Transportation alternatives funds to ensure each region has sufficient funding to implement projects that are large enough to achieve a meaningful result.

**Federal CMAQ.** The Congestion Mitigation and Air Quality (CMAQ) program is a federal program that funds projects that reduce vehicle exhaust emissions and improve air quality. CT DOT allocates up to **\$10 million** per year (federal) from the CMAQ program to MPOs for projects proposed by the MPOs. The program is competitive and projects are selected based on the predetermined project rating criteria. Cost effectiveness is the primary measure that is used in these criteria and is assessed on the basis of annualized project cost/annual emission benefits.

#### ***D. MPO Staffing Needs: Providing Adequate Staff Size & Expertise***

Each MPO should have a staff capable of performing the complex and technically challenging responsibilities that federal programs demand. It should be large enough and diverse enough to support basic planning and administration functions as well as more specialized functions. Ideally, each MPO staff should include persons with expertise in the areas listed below.

- a. **Basic Planning & Support Functions.** In order to fulfill their MPO role effectively, all MPOs need basic transportation planning skills as well as key support services like GIS analysis, regional data center support, program administration and management.

**Basic transportation planning:** Examples of basic transportation planning activities that MPO must be capable of performing are listed below.

- i. Preparing regional transportation plans
- ii. Programming projects in the transportation improvement program (TIP)
- iii. Bike & pedestrian planning
- iv. Transit planning
- v. Freight planning

**Support functions:** Examples of support services that MPOs require are listed below.

- vi. Community outreach & involvement
- vii. GIS analysis
- viii. Regional data center
- ix. Program administration & management

- b. **Traffic Engineering.** Engineering skills are required for many of the traffic studies conducted by MPOs. They are also essential if MPOs are to serve a role in assuring federally-funded traffic signal systems are properly maintained and operated. FHWA has asked that regional or state monitoring programs be put in place to assure municipalities maintain signal systems in good condition and regularly adjust signal timing for efficient traffic operations.

- c. Travel Demand Modeling. Federal programs require that MPOs base their plans and project recommendations on traffic and ridership forecasts developed from travel demand models that are complex and require highly skilled staff.
- d. Transportation Performance Measurement. With the recent passage of a new transportation authorization act (**MAP-21**), Congress established a **new federal requirement** that MPOs monitor transportation system performance and integrate performance goals into their planning process. These are new skill sets that MPOs will have to develop.
- e. Rail Planning. Rail planning skills might be required in those regions in which commuter rail plays a significant role in serving regional travel needs. MPO staff members do not need to be versed in the detailed aspects of rail operations and planning, but they need to understand basic rail planning functions and be able to communicate with officials who finance, manage, and operate rail systems in their region.
- f. Project Design & Delivery. Consolidation will help MPOs develop the capacity needed to design and deliver municipal road projects funded through various federal and state programs. Federal programs, such as the STP Urban program, have very stringent design and delivery requirements that MPOs are not currently capable of meeting. There are two options for addressing this problem: (1) MPOs can hire and train engineering staff in federal project management requirements, or (2) CT DOT can replace each MPO's federal STP Urban funds with state funds that are not subject to the stringent federal requirements. Both options are explained below, but CT DOT is in the process of implementing option 2. If option 2 is successful, option 1 will no longer be relevant within a few years.
  - a. OPTION 1: Federal Project Design & Delivery. Consolidation would help MPOs develop the capacity needed to design and deliver municipal road projects in the federal STP Urban program and possibly the CMAQ and Transportation Alternatives programs. Responsibility for this currently rests with CT DOT, but federal regulations allow state DOTs to delegate this authority to MPOs that have the requisite training and capability. Delegation of authority will benefit both the MPOs and CT DOT.

Skills needed for federal project design & delivery include

- Roadway design & engineering
- Project management
- Cost estimating
- Federal requirements and procedures

- b. OPTION 2: LOTCIP Project Design & Delivery. CT DOT is implementing an alternate approach to solving the challenge of having MPOs develop the special staff resources needed for federal project design and delivery. The alternate approach is to replace federal funds designated for MPOs with state funds that require less specialized skills and less oversight by CT DOT. The new state program is referred to as LOTCIP or the Local Transportation Capital Improvement Program.

The LOTCIP funds are not subject to stringent federal and state procurement, design, construction requirements. They still require each MPO to manage a process of selecting, developing, and delivering roadway improvement projects. However, since state funds are being used rather than federal funds, the regions can apply project design and delivery requirements that are more appropriate to small municipal projects. In most cases, a LOTCIP project is subject to the municipal design, procurement, and construction standards already used by the respective municipality.

MPOs might still need to hire an engineer to work with municipalities to design and deliver projects, but the engineer need not be experienced in federal project delivery.

*Benefits of Project Design & Delivery through MPOs.*

- *MPO Benefits from MPO Project Delivery.* The MPOs will gain full control over the management of a program and its funding.<sup>1</sup> This will allow them to manage their own project schedules and costs rather than relying on CT DOT staff who often have limited time and competing priorities. They can also develop streamlined design and delivery processes rather than using DOT's procedures that are more appropriate for large state projects.
- *CT DOT Benefits from MPO Project Delivery.* With MPOs managing their own projects, DOT staff resources can be reallocated to support state programs that are in need of additional staff. This will help ensure that state projects are delivered on time and on schedule even as the number of projects programmed is increasing.

---

<sup>1</sup> MPOs are responsible for project selection in the STP Urban program, but rely on CT DOT staff to design and deliver projects. Most of projects selected by MPOs in this program are on municipal roads rather than state roads. DOT staff is responsible for project design and delivery of these projects regardless of what roads the projects are on.

## Appendix 1

### State Legislative Background on “*Planning Region*” (COG) Consolidation

Section 16a-4c of the Connecticut General Statutes (CGS), as amended by Section 249 of Public Act 13-247, required the Office of Policy and Management (OPM) to conduct an analysis of the boundaries of logical planning regions by January 1, 2014, and at least every twenty years thereafter. A provision of the statute allows any two or more contiguous planning regions that agree to voluntarily consolidate and begin the process of forming a single council of governments to be exempt from OPM’s analysis (provided the Secretary formally redesignates the consolidated region prior to January 1, 2014). OPM conducted outreach to each regional planning organization (RPO) and consulted with all of the entities prescribed by statute.

Upon completion of OPM’s analysis, the Secretary notified the chief executive officer (CEO) of each municipality located in a planning region in which the boundaries are proposed for redesignation. The CEO of each municipality was allowed to appeal the proposed redesignation by petitioning the Secretary. OPM received three appeals from municipalities on their analysis. These appeals were reviewed and OPM granted each municipality’s request to join a different planning region.

The boundaries of planning regions resulting from OPM’s analysis and subsequent municipal appeals process took effect January 1, 2015. In addition, CGS Section 8-31b of the 2014 Supplemental (PA 13-247, Sec. 250) requires that any regional planning agency or regional council of elected officials be reconstructed to form a regional council of governments (COG) by January 1, 2015. The following map shows the new COG boundaries. The final designations resulted in nine COGs.

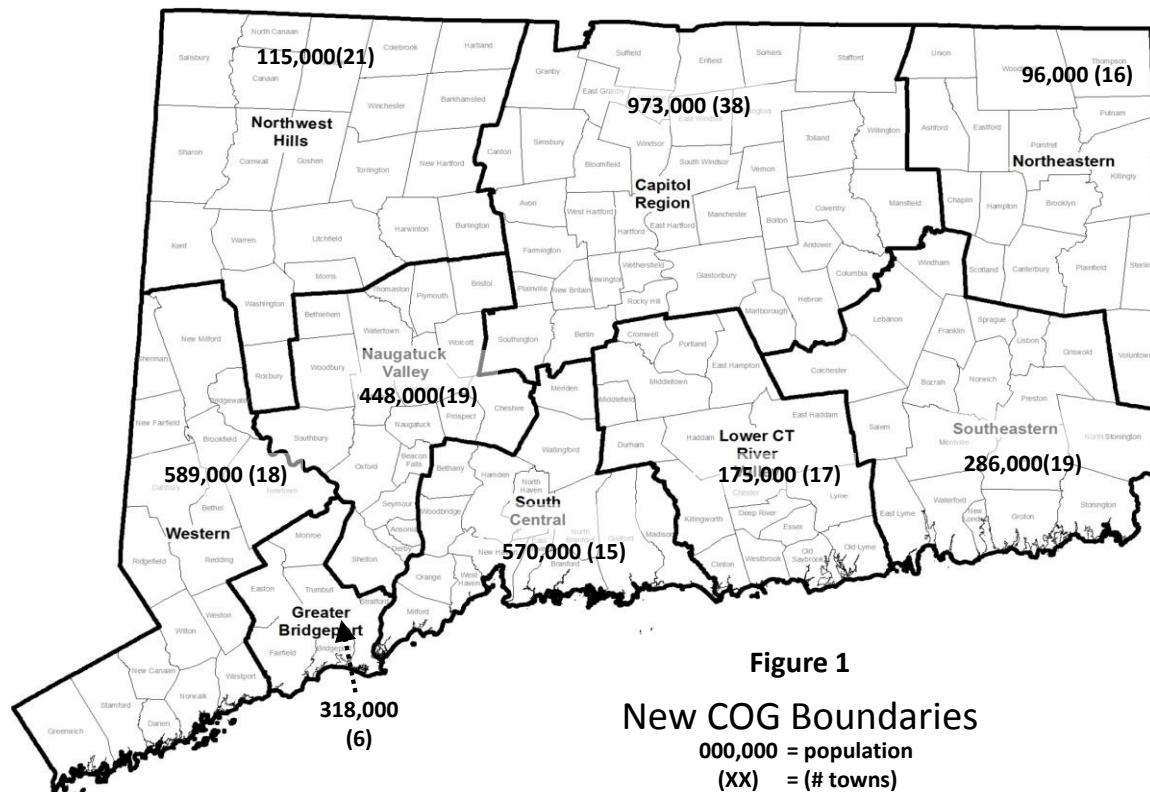


Figure 1

New COG Boundaries

000,000 = population

(XX) = (# towns)

## Appendix 2

### Federal Requirements & Process for MPO Redesignation & Consolidation

The role of an MPO in the transportation process is outlined in federal regulations. An MPO must be designated for each urbanized area with a population of more than 50,000 people. MPOs were created to give local elected officials a voice in decisions regarding the use of federal transportation funds in their region. MPOs must follow a planning process that ensures expenditures of transportation funds are based on a continuing, cooperative, and comprehensive planning process.

**MPO Policy Boards.** U.S. Code Chapter 23 § 134(D)2 requires that all MPOs operating in a TMA or Transportation Management Area (urban population over 200,000) to be governed by a board consisting of local elected officials, representatives of agencies that operate alternative modes of transportation, and relevant state officials.

Actual board composition is not set by federal law or regulation and MPO governing boards adopt bylaws regulating how they will operate. The number of seats on each MPO governing board is established during the designation of a newly-formed MPO. After the initial designation, each MPO will adopt bylaws that dictate the number of seats and voting rights on the governing board and determine if non-voting members will be added.

**MPO Redesignation.** Once an MPO is designated, it stays as such until the MPO is redesignated. An MPO may be redesignated by agreement between the governor and units of general purpose local government that together represent at least 75% of the existing planning area population, including the largest city.

Federal MPO redesignation rules pertaining to this exercise are outlined below, and a process diagram is provided in the flow diagram that follows.

#### Federal Regulations Regarding MPO Redesignation

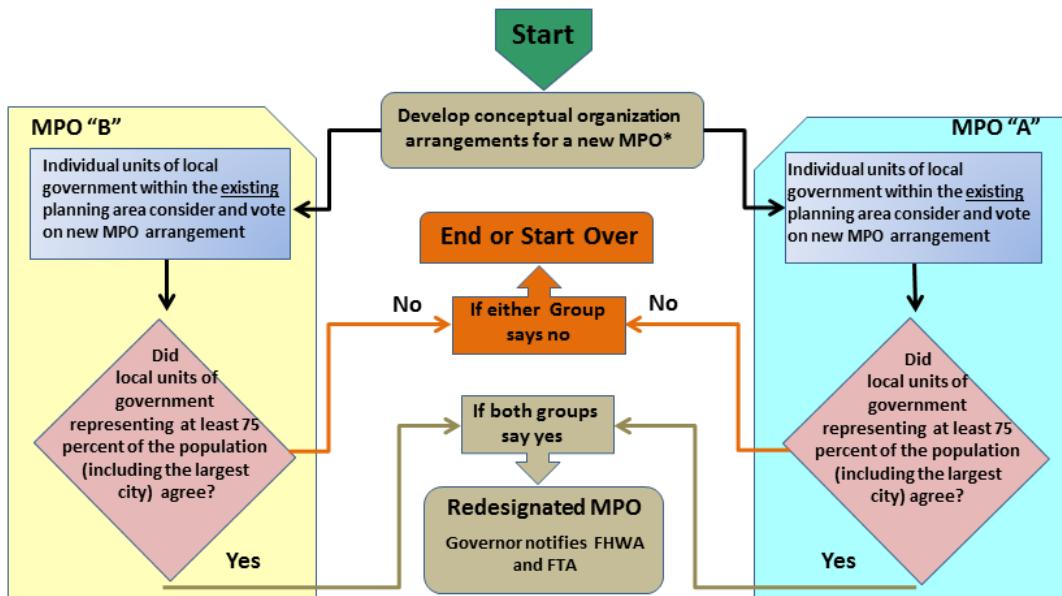
*Excerpts from 23 CFR 450.310*

- g.) An MPO designation shall remain in effect until an official redesignation has been made in accordance with this section.
- h.) An existing MPO may be redesignated only by agreement between the Governor and units of general purpose local government that together represent at least 75 percent of the existing metropolitan planning area population (including the largest incorporated city, based on population, as named by the Bureau of the Census).
- j.) For the purposes of redesignation, units of general purpose local government may be defined as elected officials from each unit of general purpose local government located within the metropolitan planning area served by the existing MPO.
- k.) Redesignation of an MPO (in accordance with the provisions of this section) is required whenever the existing MPO proposes to make:
  - 1) A substantial change in the proportion of voting members on the existing MPO representing the largest incorporated city, other units of general purpose local government served by the MPO, and the State(s); or
  - 2) A substantial change in the decision-making authority or responsibility of the MPO, or in decision-making procedures established under MPO by-laws.

I.) The following changes to an MPO do not require a redesignation (as long as they do not trigger a substantial change as described in paragraph (k) of the section):

- 1) The identification of a new urbanized area (as determined by the Bureau of the Census) within an existing metropolitan planning area;
- 2) Adding members to the MPO that represent new units of general purpose local government resulting from expansion of the metropolitan planning area;
- 3) Adding members to satisfy the specific membership requirements for an MPO that serves a TMA; or
- 4) Periodic rotation of members representing units of general-purpose local government, as established under MPO by-laws.

## MPO Consolidation “General” Process/ Timeline



## Appendix 3

### State Legislative Background on “MPO” Consolidation

Sec. 260 of Public Act 13-247 tasked the Department of Transportation to prepare a report on the consolidation and redesignation of metropolitan planning organizations. The report must:

- 1) Include a suggested process for redesignation
- 2) Provide details on the assistance CT DOT can provide to the MPOs
- 3) Identify structures and resources that would be necessary to meet federal transportation requirements related to planning, capital programming, project selection, asset management, and performance measures as outlined in MAP21.

The MPO consolidation initiative was also guided by some of the recommendations of the Legislature’s M.O.R.E. Commission (Municipal Opportunities & Regional Efficiencies). The final report of the M.O.R.E. Commission (dated May 6, 2013) outlined the mission and recommendations of the MORE Commission’s Transportation Working Group.

“The mission of the Transportation working group was to find efficiencies in regional planning through coordination and implementation by working with the Department of Transportation, the Office of Policy and Management, local elected officials and representatives of the existing Regional Planning Organizations. The transportation proposals are considered extensions of HB 6629, provided in this packet.”

The Transportation Working Group proposals consist of the following:

- 1) **Consolidate MPOs statewide.** The Commission recognized the need for flexibility in defining MPO geographic boundaries, and consideration of important north/south transportation routes, geographic affinities, and municipal preferences.
- 2) **Commission a report by CT DOT** to provide suggested guidelines and process relating to the new MPO structure, including funding (Federal grants; project funds vs. operational funding, source and reliability of state funding streams), staffing (as required to handle delegated responsibilities from DOT), communications, data-collection and sharing, overall process and framework, inter-MPO relations and DOT/MPO relations -- to be delivered by January 1, 2014 so as to coincide with OPM's required recommendations report (Subsequent legislation amended this deadline to July 1, 2014 (PA 13-247)).
- 3) **Create a working group**, to include representatives of DOT, OPM, the MPOs, elected officials and, perhaps, others, to pursue further clarification of all the aforementioned issues during the period between the passage of a bill this session and the January 1, 2014 receipt of the aforementioned reports, so as to inform further legislative, as needed, in the next session.

## Appendix 4

### CT DOT's General Process & Timeline for MPO Consolidation

CT DOT has been holding a series of meetings with each MPO and/or newly designated COG to discuss options. The goal is arrive at an agreement on a framework for possible MPO consolidation and/or coordination. The process is illustrated in the flow diagram below, which also includes a general timeline. Timelines for individual MPOs will vary.

### MPO Consolidation "General" Process/ Timeline

Figure 1

