



Santa Fe MPO Transportation Policy Board

SPECIAL MEETING Thursday, March. 18th, 2021 6:00 P.M.

AGENDA

SPECIAL PROCEDURES FOR VIRTUAL ATTENDANCE AND PUBLIC COMMENT:

In response to the State's declaration of a Public Health Emergency, the Mayor's Proclamation of Emergency, and the ban on public gatherings of more than five (5) people, this meeting will be conducted virtually using Zoom.

Attending on Zoom: Members of the public may attend the Zoom meeting on a computer, mobile device, or phone. The video conference link and teleconference number will be posted on the City of Santa Fe's Calendar of Events website at least seventy-two (72) hours before the meeting: <https://www.santafenm.gov/events>. The direct Zoom link is:

Please click the link below to join the webinar:

<https://santafenm-gov.zoom.us/j/94380581012>

Meeting ID: 943 8058 1012

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(Houston)
+16699006833,,94380581012# US (San
Jose)**Passcode: 546440**

Public Comment:

- **By video:** A person attending the Zoom meeting by video conference (using a computer, mobile device, or smart phone) may provide public comment during the meeting. Attendees should use the "Raise Hand" function to be recognized by the chair to speak at the appropriate time.
- **By phone:** A person attending the Zoom meeting by phone may provide public comment during the meeting but **must** provide advance notice to MPO staff. Please contact Erick Aune (505-955-6664) ejaune@santafenm.gov no later than Thurs., March. 18th, 2021, and provide

your **full name, address, and the phone number** you will be using to call in to the teleconference. Without your phone number, the chair will not be able to recognize you to speak at the meeting.

- **In writing:** A person may submit written public comments in advance of the meeting by email (ejaune@santafenm.gov), by U.S. Postal Service (City of Santa Fe, ATTN: Erick Aune/MPO Officer, PO Box 909, Santa Fe, NM 87504-0909), or by dropping off a comment at the physical drop box which will be located outside City Hall at the entrance to Land Use Lobby facing Marcy Street. Please include your full name and address, and identify the specific agenda item you are commenting on. To be included in the official record and considered at the hearing, written public comment **must** be received no later than Thursday. March 18th, 2021.

Call to Order:

Approval of Agenda:

1. Items for Discussion and Possible Action:

- a. **Formal Support of "Comments" to be submitted to the Office of Management and Budget/White House Regarding the Federal Register Notice that solicits public comment on the 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**

Persons with disabilities in need of accommodations, contact the City Clerk's office at 955-6520, five (5) working days prior to the meeting date. The Santa Fe MPO is committed to compliance with Title VI of the Civil Rights Act of 1964, 49 CFR, part 2, and all related regulations and directives. The Santa Fe MPO assures that no person shall on the grounds of race, color, national origin, gender, age, or disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity under any Santa Fe MPO program, activity or service.

This Santa Fe MPO's Public Participation Process satisfies the Public Participation Process Plan for Santa Fe MPO and the Santa Fe Trails' Program of Projects



Santa Fe Metropolitan Planning Organization



Santa Fe MPO Staff Report Transportation Policy Board Special Meeting: March 18, 2021

Matter of Approval: Approval of Self-Certificate to submit comment letter to the Office of Management and Budget regarding Recommendations from the Metropolitan and Micropolitan Statistical Area Standards Review Committee to the Office of Management and Budget Regarding Changes to the 2010 Standards for Delineating Metropolitan and Micropolitan Statistical Areas

Background:

In January of 2021, the Office of Management and Budget (OMB) released the public comment process regarding recommendations it has received from the Metropolitan and Micropolitan Statistical Area Standards Review Committee for changes to OMB's metropolitan and micropolitan statistical area standards. These standards determine the procedures for delineating and updating the statistical areas as new data become available, and responses to this request will be carefully considered by OMB in establishing revised standards.

The metropolitan area program has provided standard statistical area delineations for approximately 70 years. In the 1940s, it became clear that the value of statistics produced by Federal agencies would be greatly enhanced if agencies used a single set of geographic delineations for the Nation's largest centers of population and activity. OMB's predecessor, the Bureau of the Budget, led the effort to develop what were then called "standard metropolitan areas" in time for their use in 1950 census publications. Since then, comparable data products for metropolitan areas have been available.

The general concept of a metropolitan statistical area is that of an area containing a large population nucleus and adjacent communities that have a high degree of integration with that nucleus. The concept of a micropolitan statistical area closely parallels that of the metropolitan statistical area, but a micropolitan statistical area features a smaller nucleus.

As currently operationalized, a metropolitan statistical area must contain a Census Bureau-delineated urban area with a population of 50,000 or more, while a micropolitan statistical area must contain a Census Bureau-delineated urban area with a population of 10,000 to 49,999. (Areas delineated in annual updates based on Census Bureau place population estimates are exempted from this requirement until the following decade.)

Both metropolitan and micropolitan statistical areas are composed of entire counties. "Central counties" are those that have substantial population residing in the largest urban area of the metropolitan or micropolitan statistical area. "Outlying counties" qualify based on having sufficient commuting with the central county or counties of the area. Counties that do not fall within metropolitan or micropolitan statistical areas are termed "outside core based statistical area."



Santa Fe Metropolitan Planning Organization



The committee made the following recommendation in their report to OMB:

The minimum urban area population to qualify a metropolitan statistical area should be increased from 50,000 to 100,000 (Release Date June 2023)

Please note that though the entire County of Santa Fe is delineated as a Metropolitan Statistical Area it is the Census Bureau-delineated urban area that would impact both Farmington and Santa Fe MPOs in New Mexico, two of 144 impacted across 45 states and Puerto Rico.

The Census Bureau identifies two types of urban areas: Urbanized Areas (UAs) of 50,000 or more people; Urban Clusters (UCs) of at least 2,500 and less than 50,000 people. New Mexico has 4 metropolitan statistical areas, 15 micropolitan statistical areas, and 2 combined statistical areas. New Mexico has 46 urban areas; 6 urbanized areas and 40 urban clusters.

Santa Fe is one of the six “urbanized” areas and ours with a population less than 100K, hence the impact.

In a letter dated March 16th 2021, 53 Members of Congress submitted a letter opposing the recommendation with this compelling statement:

“The Committee’s recommendation to increase the minimum threshold to 100,000 persons is based on one factor only; that the minimum population required for an urban area to qualify as an MSA has not kept pace with population growth of the U.S. Because the U.S. population has more than doubled since 1950, the Committee therefore believes the minimum MSA population standard should double as well. That rationale is devoid of any cogent, scientific, or statistically relevant standard.”

As of 10AM on March 18th the number of submissions to the OMB has gone from 137 yesterday to now 284. The deadline is March 19th.

Santa Fe MPO staff have conferred with dozens of fellow MPOs impacted as well as the NMDOT, all of which are submitting letters opposing the recommendation. The common themes include:

- Arbitrary and capricious reasoning for said recommendation
- Lack of attention to the potential impacts to affected metropolitan areas
- A decision of this magnitude ought not rest with a committee and within an administrative procedural process and should be carefully analyzed for greater impacts
- Lack of clarity on just how this decision makes data analysis significantly more statistically insightful or useful.
- The potential for the loss of federal funding under multiple programs including the loss of MPO funding/operations.



Santa Fe Metropolitan Planning Organization



MPO SELF-CERTIFICATION

**Approval of the Santa Fe MPO Board Formal Comments Letter As To:
Recommendations from the Metropolitan and Micropolitan Statistical
Area Standards Review Committee to the Office of Management and
Budget Regarding Changes to the 2010 Standards for Delineating
Metropolitan and Micropolitan Statistical Areas**

**Approved on March 18th, 2021 by the Santa Fe MPO Transportation
Policy Board**

Per the attached letter the Santa Fe MPO opposes the recommendations to change the standard to which delineate "Metropolitan and Micropolitan Statistical Areas".

Anna Hansen, Chair- Santa Fe MPO TPB

Date



Santa Fe Metropolitan Planning Organization



Anna Hansen, MPO Chair
Santa Fe MPO Transportation Policy Board
PO Box 909
Santa Fe, NM

March 18, 2021

Mr. Dominic J. Mancini
Deputy Administrator
U.S. Office of Management and Budget
725 17th St NW
Washington, DC 20503

RE: Recommendations from the Metropolitan and Micropolitan Statistical Area Standards Review Committee to the Office of Management and Budget Regarding Changes to the 2010 Standards for Delineating Metropolitan and Micropolitan Statistical Areas

Dear Mr. Mancini and Mr. Fitzsimmons,

The Santa Fe Metropolitan Planning Organization (MPO) Transportation Policy Board formally met on March 18th, 2021 and voted unanimously to memorialize these comments. Until the full range of consequences for federal funding is identified and analyzed, The Santa Fe MPO respectfully but strongly opposes OMB's proposal to raise the population threshold to qualify as a Metropolitan Statistical Area (MSA) from 50,000 to 100,000.

The Santa Fe MPO has been providing transportation planning services to the City of Santa Fe, Santa Fe County, the New Mexico Department of Transportation, and the Pueblo of Tesuque for 39 years. The Santa Fe OMB-designated MSA includes Santa Fe County, home of the state capitol. Its major industries are state government and arts and entertainment. Changing what counts as an MSA may have a negative, unintended consequence for smaller MPOs throughout most of the United States. This change impacts 45 states as well as Puerto Rico.

As an example of unintended consequences, Santa Fe is the 4th largest city in the state of New Mexico. Whereas it may be statistically advantageous in more densely urbanized areas to change the threshold, Santa Fe enjoys approximately 3.8% of New Mexico's population, one can compare this to the idealized MPO size of 100,000 in a state such as Connecticut with a population of 3,656,000 to find that a smaller

percent of that state is represented by the example MPO (2.8%). By population percentage, we are technically larger than the comparison scenario, yet likely we have to plan for a larger geographical area as well. This is arguably more difficult than planning for smaller, denser areas.

The Santa Fe MPO provides critical support for transportation planning and improvements in Santa Fe and FTA funds about 30-50% of the City of Santa Fe's transit services. Proposed changes would go beyond the "statistical" benefits detailed by the committee. Federal programs including FTA and FHWA use the OMB standards to inform definitions of "rural" and "urban" that impacts allocation formulas and eligibility requirements.

All MPOs play a vital role in developing current and future transportation plans and in determining transportation investments in urbanized areas. Preserving the voice of smaller MPO's is crucial to ensuring that these areas retain some authority over how their communities grow. An urbanized area is an incorporated area with a population of 50,000 or more that is designated as such by the U.S. Department of Commerce, Bureau of the Census. This funding is largely utilized by minority, low income, elderly and disabled individuals as their only means of transportation to employment, medical facilities and grocery stores. This is evidenced by the planning services dedicated to supporting federal funding projects that serve all members of the community with a focus on equity and environmental justice.

The City of Santa Fe also enjoys Community Development Block Grant Funding (CDBG) – providing annual grants on a formula basis then enables Santa Fe to address a critical housing affordability and availability issues while expanding economic opportunities.

For these reasons, we strongly urge the Metropolitan and Micropolitan Statistical Area Standards Review Committee to abandon the current proposal to raise the minimum urban area population.

Respectfully Submitted,

Anna Hansen, Chair

CC:

Office of the Senator Martin Heinrich

Office of the Senator Ben Ray Lujan

Office of the Representative Teresa Leger Fernandez



City of Santa Fe, New Mexico

200 Lincoln Avenue, P.O. Box 909, Santa Fe, N.M. 87504-0909
www.santafenm.gov

Alan Webber, Mayor

Councilors:

Signe I. Lindell, Mayor Pro Tem, District 1
Renee Villarreal, District 1
Michael J. Garcia, District 2
Carol Romero-Wirth, District 2
Roman "Tiger" Abeyta, District 3
Chris Rivera, District 3
Jamie Cassutt-Sanchez, District 4
JoAnne Vigil Coppler, District 4

Mr. Dominic J. Mancini
Deputy Administrator
U.S. Office of Management and Budget
725 17th St NW
Washington, DC 20503

Dear Mr. Mancini,

This letter responds to the report "Recommendations from the Metropolitan and Micropolitan Statistical Area Standards Review Committee to the Office of Management and Budget: Changes to the 2010 Standards for Delineating Metropolitan and Micropolitan Statistical Areas."

As Mayor of one of the two communities in New Mexico that would lose its metropolitan status through the proposed change to the regulation, I respectfully oppose the proposal to increase the minimum urban population needed to qualify as a Metropolitan Statistical Area to 100,000 from 50,000. The depth of the consequences of the proposed change are unclear. What does seem clear is the consideration that the City of Santa Fe could lose access to critical Federal funding needed to support low-income residents and improve and maintain our local infrastructure. Federal programs are informed by the OMB standards to support definitions of "rural" and "urban" that influence allocation formulas, eligibility requirements, scoring criteria, and other elements of program administration. Retaining consistency in the MSA program is also helpful for local governments and businesses that depend on long-term trend data to better understand the economies in their areas.

A determining factor within formulas used by the Department of Housing and Urban Development and the Federal Highway Administration is an area's urban, non-urban or rural status. The City of Santa Fe relies on funding made available in part because of its urban status. For example, in the area of transit services, the City of Santa Fe relies on between 30% and 50% of Federal funds to provide critical mobility needs for our underserved populations. In the area of affordable housing, the City uses HUD's Community Development Block Grant funds to support critically needed housing programs.

The City of Santa Fe has enjoyed the transportation planning services and the resulting infrastructure investments delivered by the Santa Fe Metropolitan Planning Organization (MPO) for 39 years. Again, the reliance on the OMB's standards to inform funding for MPOs is of critical concern given the level of support provided by the MPO.

The justification offered for the proposal notes that the population of the United States has doubled since 1950, when the MSA was established. That change in national population has no impact on the funding needs that urban areas over 50,000 in population continue to have. Since the 1990 census, the population of the City of Santa Fe has grown from 55,859 residents to more than 83,922 as of 2019, making it the 4th largest city in the state.

When it comes to issues of urbanization, including mobility, housing, infrastructure, integrated response to climate change, social policy, and more, the City of Santa Fe is, in every respect and by any reasonable definition, a metropolitan area and a metropolitan entity.

For these reasons, I respectfully oppose this revision to Federal regulation. Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alan Webber', with a stylized flourish at the end.

Alan Webber
Mayor

Congress of the United States
House of Representatives
Washington, DC 20515

March 16, 2021

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

Dear Acting Director Fairweather:

We write today to express our concern about the recommendations from the Metropolitan and Micropolitan Statistical Area Standards Review Committee (Committee) published in the Federal Register on January 19, 2021 (Federal Register Number 2021-00988). Specifically, we are opposed to the reclassification of a Metropolitan Statistical Area (MSA) as an area with a population of at least 100,000. This change will result in 144 areas in 45 states and Puerto Rico losing their MSA designation.

As you know, when the original MSA designation was made just prior to the 1950 Census, a population of 50,000 persons was set as the minimum population level necessary for an urban area to be considered an MSA. The Committee's recommendation to increase the minimum threshold to 100,000 persons is based on one factor only; that the minimum population required for an urban area to qualify as an MSA has not kept pace with population growth of the U.S. Because the U.S. population has more than doubled since 1950, the Committee therefore believes the minimum MSA population standard should double as well. That rationale is devoid of any cogent, scientific, or statistically relevant standard.

In the Committee's report to the Office of Management and Budget, dated August 1, 2019, the Committee makes no argument detailing the statistical need for changing the minimum MSA population threshold. Without clearly explaining the statistical drawbacks of adhering to the current population threshold and the statistical advantages of moving to the proposed new threshold, the change is based solely on the feelings of the Committee members and not on evidentiary proof or any scientific basis. Doubling the population threshold for an MSA merely because it sounds fair to the Committee is not an appropriate standard for changing U.S. Government policy.

Currently, roughly 86 percent of the U.S. population is designated as living within an MSA. Should the proposed change be adopted, that figure would fall to roughly 80 percent. Again, the Committee provides no discussion of whether this change makes MSA data significantly more statistically insightful or useful. Since the Committee ignores the argument altogether, we can

only assume that the Committee did not do its due diligence and made an arbitrary recommendation.

Additionally, the Committee evidently ignored how this population threshold change might affect broader statistical analysis. Since this threshold has been consistently in use for over 70 years, it is reasonable to assume that changing it now would create crucial data inconsistencies, especially for any longitudinal statistical studies in process from the federal government, state and local governments, academic institutions, or independent policy groups.

Finally, though we realize that the Committee does not take policy outcomes into consideration when offering its recommendations for the MSA threshold change, and we know that the U.S. Census Bureau and OMB routinely advise federal agencies that the MSA designation should not be used as a basis for implementing policy, it is well-known that federal agencies have long ignored that advice. As such, we would be remiss if we did not highlight how this proposed change could negatively impact our local communities. Many federal programs incorporate the MSA designation into the decision-making structure of how federal dollars are spent. From the Department of Housing and Urban Development's Community Development Block Grant (CDBG), to the Office of Personnel Management's Locality Pay Program for General Schedule Employees, to the Department of Health and Human Service's Medicare payment system for hospital inpatients, and the Ryan White HIV/AIDS program, to name a few, the definition of what constitutes an MSA is critically important to communities across America. Losing an MSA designation could mean tens or hundreds of millions of dollars in lost federal grant money to communities already struggling to rebuild economic engines that have been damaged by our current Covid-19 crisis.

The American taxpayer deserves to know that this proposed change was made using data-driven evidence and that all reasonably foreseeable effects from the change were carefully evaluated. While we appreciate the Committee's work, given the arguments made above, we believe the proposed change to be arbitrary and capricious and urge the Office of Management and Budget to reject the proposal.

Sincerely,



Bruce Westerman
Member of Congress



Susan Wild
Member of Congress



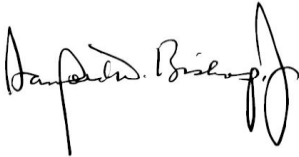
Robert B. Aderholt
Member of Congress



Mark Amodei
Member of Congress



Cliff Bentz
Member of Congress



Sanford Bishop
Member of Congress



Mike Bost
Member of Congress



Mo Brooks
Member of Congress



Salud Carbajal
Member of Congress



Jerry Carl
Member of Congress



Earl L. "Buddy" Carter
Member of Congress



Matt Cartwright
Member of Congress



Ben Cline
Member of Congress



Michael Cloud
Member of Congress



Jim Costa
Member of Congress



Rick Crawford
Member of Congress



Rodney Davis
Member of Congress



Suzan DelBene
Member of Congress



Antonio Delgado
Member of Congress



Randy Feenstra
Member of Congress



Russ Fulcher
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Member of Congress



Sam Graves
Member of Congress



Glenn Grothman
Member of Congress



Jim Hagedorn
Member of Congress



Ashley Hinson
Member of Congress



Fred Keller
Member of Congress



Daniel T. Kildee
Member of Congress



Anne Kirkpatrick
Member of Congress



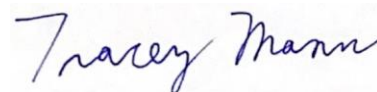
Ronny Jackson
Member of Congress



Teresa Leger Fernández
Member of Congress



Frank D. Lucas
Member of Congress



Tracey Mann
Member of Congress



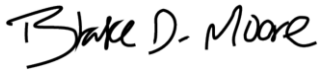
Peter Meijer
Member of Congress



Dan Meuser
Member of Congress



Barry Moore
Member of Congress



Blake Moore
Member of Congress



Frank Mrvan
Member of Congress



Richard Neal
Member of Congress



Tom O'Halleran
Member of Congress



Greg Pence
Member of Congress



August Pfluger
Member of Congress



Mike Rogers
Member of Congress



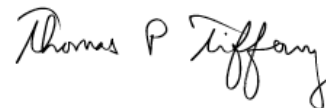
Austin Scott
Member of Congress



Jason Smith
Member of Congress



Bryan Steil
Member of Congress



Thomas P. Tiffany
Member of Congress



Dina Titus
Member of Congress



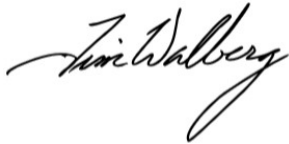
Glenn "GT" Thompson
Member of Congress



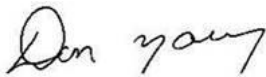
David Trone
Member of Congress



David G. Valadao
Member of Congress



Tim Walberg
Member of Congress



Don Young
Member of Congress