

August 26, 2016

Gregory G. Nadeau  
Administrator, FHWA

and

Carolyn Flowers  
Acting Administrator, FTA

RE: Metropolitan Planning Organization Coordination and Planning Area Reform Notice of Proposed Rulemaking  
[Docket No. FHWA-2016-0016; FHWA RIN 2125-AF68; FTA RIN 2132-AB28]

Dear Administrator Nadeau and Acting Administrator Flowers:

The Georgia Association of Metropolitan Planning Organizations (GAMPO) is supportive of the overall goal of promoting more effective regional planning and better coordination among metropolitan planning organizations, as outlined in the proposed rulemaking. However, GAMPO foresees some unintended consequences to the proposed rules in Georgia as listed below:

- The MPOs in Georgia already have a good working relationship with each other. They coordinate and cooperate with neighboring MPOs on regional planning. The proposed rules will stretch regional cooperation on planning to mandating jointly developed transportation plans and transportation improvement programs. GAMPO believes this requirement exceeds congressional intent.
- Per the 2000 U.S. Census, the Atlanta and Gainesville urbanized areas were separate and not contiguous. While the 2010 Census indicates that these two urbanized areas touch each other due to population growth, they continue to maintain their separate identity. For example, the majority of the people in the Gainesville urbanized area live and work in Hall County. Similarly, the majority of the people who reside in the Atlanta urbanized area work in Atlanta and not commute to Gainesville. The rule encourages MPOs to merge in situations like this, which would not respect the identity of each urbanized area and commute patterns.
- The Atlanta Regional Commission (ARC), the MPO for the Atlanta urbanized area, already consists of 20 counties. Merging the Cartersville-Bartow MPO and the Gainesville-Hall MPO into ARC will result in a 23-county Metropolitan Planning Area which will be too large and complex to manage under a single MPO. While the rule would allow the MPOs to remain distinct, the requirement to prepare joint planning documents is also unworkable for such a large and diverse area.
- Merging the Macon and the Warner Robins MPOs will result in crossing the 200,000 population threshold for Transportation Management Area (TMA). The Macon MPO lacks the staff and the capability to handle the additional administrative responsibilities of a TMA.
- The Dalton MPO and the Chattanooga MPO have distinctly separate identities and represent planning areas that are growing in different directions. Dalton's growth is northeast and east. Chattanooga's is mainly north and northeast. Merging these two MPOs will not produce a more effective planning organization, but a less effective one for both areas. In addition, Chattanooga is a non-attainment area and Dalton is not.
- If individual counties are required to join multiple MPOs for each different urbanized area, it will be cumbersome and create confusion. For example, Jackson County contains portions of the Athens, Atlanta, and Gainesville urbanized areas, which would require them to participate in three separate MPO processes. This is not an efficient and productive way for elected officials and the public to provide their input on transportation issues.

- The primary role of smaller MPOs is to provide local input into regional transportation decisions. These decisions are often complex, cross political boundaries, and dictate future economic vitality of our regions. Each of our MPO Policy Boards is comprised of local elected leaders and key local transportation stakeholders who are familiar with local conditions and have direct accountability to voters in our region. If the smaller MPOs are required to merge with their larger adjacent MPOs, it will diminish the voice of local governments and their citizens.

Thank you for the opportunity to provide input and comments. We look forward to working with FHWA and FTA as you move forward with finalizing these rules. Should you have any questions or seek further input, please contact me at 229-333-5277.

Sincerely,

Corey Hull, AICP  
Chairman  
Georgia Association of MPOs

**GAMPO**  
Georgia Association of MPOs

cc: Kerrie Davis, Albany MPO  
Brad Griffin, Athens-Clarke County MPO  
John Orr, Atlanta Regional Commission  
George Patty, Augusta MPO  
David Hainley, Brunswick MPO  
Lamont Kiser, Cartersville-Bartow MPO  
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