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# Santa Fe Metropolitan Planning Organization

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## 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

Handwritten signature of Anna Hansen in black ink.

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Date

03/18/21

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# 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 17<sup>th</sup> 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 18<sup>th</sup>, 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.

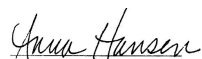
All MPOs play a vital role in developing current and future transportation plans and in determining transportation investments in urbanized areas. Preserving the voice of smaller MPO's is crucial to ensuring that these areas retain some authority over how their communities grow. An urbanized area is 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. Along with myself the members of the Santa Fe MPO Transportation Policy Board voting herein include:

Vice-Chair & City Councilor, Renee Villarreal  
Mayor Allen Webber  
County Commissioner, Hank Hughes  
City Councilor, Jamie Cassut-Sanchez  
County Commissioner, Rudy Garcia  
NMDOT District 5 Engineer, Paul Brasher  
County Commissioner, Henry P. Roybal

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