



HOW ARE REGIONAL BOUNDARIES ESTABLISHED UNDER THE SUSTAINABLE COMMUNITIES REGIONAL PLANNING GRANT PROGRAM NOFA?

OVERVIEW:

In areas where there is at least one city, town, or urban cluster with a population exceeding 10,000, an applicant consortium must use either Office of Management and Budget-delineated (OMB) geographic areas to set the boundaries of its region, or the boundaries of a Metropolitan Planning Organization (MPO), if one exists in its area. In most areas of the country, these are the only options for establishing regional boundaries. OMB-delineated geographic areas are either “Metropolitan Statistical Areas” or “Micropolitan Statistical Areas.” Definitions of these terms, as well as a definition of “Metropolitan Planning Organization,” may be found on page 12 of the NOFA.

GENERAL RULE:

The general rule under the NOFA is that whatever regional geography a consortium chooses to use, whether it is the jurisdiction of a single MPO or multiple MPOs, or an OMB-delineated area or areas, the “building block” or “building blocks” of the region (the MPO or MPO jurisdictional boundaries, or the OMB-delineated boundaries) **may not be subdivided**. The only exception to this rule is if OMB-delineated areas are used, and if the region is within a Combined Statistical Area with a population exceeding 7 million, Metropolitan Divisions may be used to establish regional boundaries. A definition of “Metropolitan Division” may be found on pages 11 and 12 of the NOFA. See below for a list of the six Combined Statistical Areas where Metropolitan Divisions may be used. However, if a Metropolitan Division (or Divisions) is used to establish the geographic area of a region, the Division (or Divisions) may not be subdivided and must be included in its entirety. Combined Statistical Areas and Metropolitan Divisions are discussed in more detail below.

NON-DEFINED AREAS:

Many rural areas lie outside of the boundaries of Metropolitan Statistical Areas, Micropolitan Statistical Areas, and MPOs. The NOFA designates such areas “non-defined areas.” A consortium in a non-defined area may designate its own regional boundaries. ***This is the only exception to the general rule discussed above.***

MPOs:

A Metropolitan Statistical Area always has at least one MPO within its boundaries, although the MPO’s jurisdiction may not include the entire Metropolitan Statistical Area. MPO jurisdictional boundaries rarely extend into Micropolitan Statistical Areas or non-defined areas, although there may be a few such instances. All MPOs within a region must be members of a consortium that submits an application on behalf of the region. Here is a link to a list of MPOs:

http://www.bts.gov/external_links/government/metropolitan_planning_organizations.html

A NOTE ON THE REQUIRED INCLUSION OF MPOS WITHIN CONSORTIA:

The NOFA requires that whatever geographic option is used to establish the boundaries of a region, all MPOs that have jurisdiction within any portion of the region must be represented in the consortium submitting an application on behalf of the region. This requirement should not be confused with the NOFA's geographic requirements. If an MPO's geographic jurisdiction is used to establish the boundaries of a region, that MPO would, of course, be required to be a member of a consortium representing the region. If OMB-delineated boundaries are used, then every MPO that has jurisdiction within those boundaries must be included in the consortium.

COMBINED STATISTICAL AREAS WITH POPULATIONS EXCEEDING SEVEN MILLION:

The Combined Statistical Areas where Metropolitan Divisions may be used to establish a geographic region are: Boston-Worcester-Manchester; Chicago-Naperville-Michigan City; Los Angeles-Long Beach-Riverside; New York-Newark-Bridgeport; San Jose-San Francisco-Oakland; and Washington-Baltimore-Northern Virginia.

METROPOLITAN DIVISION EXAMPLE:

The San Francisco Bay Area is an example of a Combined Statistical Area that includes Metropolitan Divisions which may be used to establish separate regions within a Metropolitan Statistical Area. On the western side of the San Francisco Bay, the counties of Marin, San Francisco, and San Mateo are included in the San Francisco-San Mateo-Redwood City Metropolitan Division. On the eastern side of the San Francisco Bay, the counties of Alameda and Contra Costa constitute the Oakland-Fremont-Hayward Metropolitan Division.

All of these counties together comprise the San Francisco-Oakland-Fremont Metropolitan Statistical Area. Because the population of the larger San Jose-San Francisco-Oakland Combined Statistical Area exceeds 7 million, the communities within the San Francisco-Oakland-Fremont Metropolitan Statistical Area have the option of forming a consortium to represent the entire Metropolitan Statistical Area, or, alternatively, may form separate consortiums representing two distinct regions on opposite sides of the San Francisco Bay.

The entire San Francisco Bay Area, with the exception of the San Jose area, is served by a single MPO, the Metropolitan Transportation Commission (MTC). Under any of the scenarios discussed above, the MTC would be required to be a member of a consortium that submits an application on behalf of a region, whether for the entire San Francisco-Oakland-Fremont Metropolitan Statistical Area, or for two separate Metropolitan Division-defined regions.

REGIONAL BOUNDARIES THAT DO NOT MEET THRESHOLD REQUIREMENTS:

Because of the geographic requirements HUD established for how a region is to be defined, a portion or subdivision of a Metropolitan Statistical Area, Micropolitan Statistical Area, or of an MPO's area of jurisdiction cannot, in and of itself, constitute a "region" under the Sustainable Communities Regional Planning Grant Program. ***If an application were submitted for such an area, it would not meet the threshold requirements of the NOFA and would not be reviewed by HUD.*** The only situation where a consortium may designate the geographic boundaries of its region

without regard to OMB-delineated or MPO jurisdictional boundaries is if the region is within a non-defined area.

ADDING ADDITIONAL AREAS TO A REGION:

A consortium may always include within its region areas outside of its OMB-delineated or MPO jurisdictional boundaries, so long as all other NOFA requirements are met. With respect to the NOFA's geographic requirements, this means that if the area lies within a Metropolitan Statistical Area, Micropolitan Statistical Area, or an MPO's jurisdiction, the rules discussed above apply to the area the consortium wishes to include. Metropolitan Statistical Areas and Micropolitan Statistical Areas, or Metropolitan Divisions if applicable, must be included in their entirety and may not be subdivided. If MPO jurisdictional boundaries are used instead, the entire jurisdiction of the neighboring MPO must be included within the region. A region may also be formed where one building block is based on an MPO's jurisdiction, and the other building block is an OMB-delineated area, so long as they are contiguous.

EXPANDED REGION EXAMPLE:

Northeast Ohio includes a number of Metropolitan Statistical Areas and Micropolitan Statistical Areas. Among them are the five-county Cleveland-Elyria-Mentor, the two-county Akron, and the single-county Canton-Massillon Metropolitan Statistical Areas. There are also a number of Micropolitan Statistical Areas within this area which, in each case, include a single county within their boundaries. In most of these OMB-delineated areas, the MPOs that serve them have boundaries that are the same as those of the OMB-delineated area.

Under the NOFA, each of these separate areas may form a consortium to represent a region consisting of its OMB-delineated or MPO boundaries. However, a region may also be formed that comprises *more* than one of these areas, so long as they are contiguous. In other words, the separate regions may be used as building blocks to form a larger region.

For example, a region may be established representing both the Cleveland-Elyria-Mentor and Akron Metropolitan Statistical Areas, so long as other requirements of the NOFA are met. Any other contiguous area may be added as well, such as the Canton-Massillon Metropolitan Statistical Area or adjacent Micropolitan Statistical Areas such as Ashtabula or Wooster, again, so long as other NOFA requirements are met as to the composition of the consortium representing the region.

Non-defined areas may also be added to a region where the building blocks are based on MPO jurisdictional boundaries or OMB-delineated boundaries. Unlike other areas, non-defined areas may be subdivided. In the case of Northeast Ohio, there is one such area, Holmes County, which is adjacent to both the Canton-Massillon Metropolitan Statistical Area and the Wooster Micropolitan Statistical Area. Holmes County could be included, in whole or in part, within a region that includes the adjacent Metropolitan and/or Micropolitan Statistical Areas, or, alternatively, it may form a region of its own consisting of all or a portion of its geographic area.