



BONNEVILLE METROPOLITAN PLANNING ORGANIZATION



December 9, 2022

Mr. Bill Moad, Chair, Idaho Transportation Board
Idaho Transportation Department
P.O. Box 7129
Boise, Idaho 83707-1129

RE: IT Board Policy 4028 and 4028S

Dear Chairman Moad,

We, the undersigned Directors of Idaho’s five metropolitan planning organizations, urge the Idaho Transportation Board to reject the proposed changes to Board Policy 4028 and Board Policy 4028S as recommended by the Subcommittee on Policies during the November 17, 2022, Idaho Transportation Board Meeting.

The stated purpose of the Idaho Transportation Board’s directive to staff to review Board Policy 4028 was to realign the policy with its original “spirit” and “intent of an equitable share between Urban areas based on population.”¹ The recommended policy changes presented during the November Board Meeting not only fail to accomplish that goal, but in fact exacerbate the inequities already present under the currently adopted method of distribution to local public agencies.

Board Policy 4028 is woefully outdated, misaligned with federal guidance, and demonstrably deficient at adequately addressing Idaho’s transportation funding needs. The proposed changes make only minor adjustments without fixing the policy’s most fundamental flaws.

Board Policy 4028 was originally created based on data from the 1990 Census. Clearly, Idaho’s demography and transportation system have changed tremendously during the last 32 years. In 1990, the ratio of urban to rural populations was 48% rural and 52% urban. As of 2019, the ratio has changed to 33% rural and 67% urban. As Idaho grows, more and more cities’ populations will exceed 5,000, thus moving from rural to urban, thereby expanding the already inequitable distribution of funds.²

Furthermore, Board Policy 4028 pre-dates the designation of the Boise Urbanized Area as a Transportation Management Area (TMA). Including the Boise TMA under the urban share results in further dilution of distributions made available to other urban areas. Given that the TMA is funded separately and at a level required by federal law,³ we recommend that the TMA’s direct allocation be deducted prior to dividing funds among other urbanized areas.

Taken together, the failures of Board Policy 4028 to account for significant changes in both federal policy and population growth produces a highly inequitable distribution of funds between

¹ November 17, 2022, Idaho Transportation Board Meeting Packet Agenda Item: Policy Change/Update to Board Policy 4028 and Board Policy 4028S, page 83

² Table 1: Comparison of STBG Apportionments to Population Share under Current Board Policy 4028, attached below

³ 23 U.S.C. 133(e)

rural and urban areas, wherein the ratio of rural to urban per capita funding is nearly two-to-one.⁴

The Infrastructure Investment and Jobs Act (IIJA) updated the requirements of the Surface Transportation Block Grant program, including the implementation of the new 2020 Census definitions of urbanized areas, namely the specification of large and small urbanized areas.

To implement the new Census definitions of urbanized areas, the IIJA requires that “[p]rior to obligating funds attributed to an area of this type, the State must consult with the metropolitan planning organizations that represent the areas and describe how funds allocated for the areas will be allocated equitably among the applicable urbanized areas.”⁵ Given the structural inequities described above, the recommended updates to Board Policy 4028 fail to satisfy the spirit of these requirements.⁶ We implore the members of the Idaho Transportation Board to engage in further consultation with Idaho’s metropolitan planning organizations to produce a more equitable allocation among urbanized areas.⁷

To remedy the shortcomings with Board Policy 4028, we request that Board Policy 4028 be updated to conform with federal guidance regarding the distribution of Surface Transportation Block Grant (STBG) program funds. The Federal Highway Administration publishes apportionment tables each fiscal year that specify the distribution of STBG funds and the specific suballocations to areas of the State based on their relative share of the State’s population.⁸ Updating Board Policy 4028 to follow federal guidance will ensure that the distribution formula remains up to date as Idaho continues to grow.

To maintain an equitable split amongst rural and urban areas overall, rural funding could then be matched to the urban amount by using funds available to any area of the state. Given that the current review of Board Policy 4028 began more than a year ago, it’s clear that all stakeholders would benefit greatly from obviating the need to revisit this issue in the future.

If the Idaho Transportation Board or ITD Staff have any questions about our concerns or this request, please contact Glenn Miles, Executive Director of the Kootenai Metropolitan Planning Organization, at 208-930-4164 or gmiles@kmpo.net. We appreciate your consideration of these comments.

Sincerely,



MORI BYINGTON, Director
Bannock Transportation Planning Organization



DARRELL WEST, Director
Bonneville Metropolitan Planning Organization

⁴See Table 2: Comparison of STBG Apportionments to Population Share under Proposed Update to Board Policy 4028 attached below

⁵ 23 U.S.C. 133(d)(3)(A)

⁶ See Table 3: Comparison of LPA Distributions to Population Share under Proposed Update to Board Policy 4028 attached below

⁷ “*Consultation* means that one party confers with another identified party and, prior to taking action(s), considers that party’s views.” 23 CFR 470.103 “*Consultation*”

⁸ Revised Fiscal Year (FY) 2022 Supplementary Tables – Apportionments Pursuant to the Infrastructure investment and Jobs Act https://www.fhwa.dot.gov/legsregs/directives/notices/n4510868/n4510868_t9.cfm



MATTHEW J. STOLL, Executive Director
Community Planning Association of
Southwest Idaho



GLENN MILES, Executive Director
Kootenai Metropolitan Planning Organization



SHANNON GROW, Director
Lewis-Clark Valley Metropolitan Planning
Organization

c: Idaho Transportation Board Members
Idaho MPO Directors

Table 1: Comparison of STBG Apportionments to Population Share under Current Board Policy 4028

Area	Population (2019)	Relative Share of Statewide Population	FY2021 ITD Apportionment (STBG)	Per Capita Spending
Urban + TMA (Total Over 5,000)	1,189,977	66.59%	\$18,174,455	\$15.27
TMA (200,000+)	407,550	22.81%	\$10,020,324*	\$24.58
Urban (5,000-200,000)	782,427	43.78%	\$8,154,131	\$10.42
Rural (Less than 5,000)	597,088	33.41%	\$18,174,455**	\$30.44

*TMA apportionment set by federal law

**Prior to rural exchange of \$5 million federal for \$4 million state

Table 2: Comparison of STBG Apportionments to Population Share under Proposed Update to Board Policy 4028

Area	Population (2019)	Relative Share of Statewide Population	FY2023 ITD Apportionment (STBG) Pre-AUA	FY2023 ITD Apportionment (STBG) Post-AUA	Per Capita Spending Post-AUA
Urban + TMA (Total Over 5,000)	1,189,977	66.59%	\$21,170,000	\$25,170,000	\$21.15
TMA (200,000+)	407,550	22.81%	\$11,100,000*	\$11,100,000*	\$27.24
Large Urban (50,000-200,000)	556,960	31.17%	\$6,400,000	\$9,000,000	\$16.16
Small Urban (5,000-49,999)	225,467	12.62%	\$3,650,000	\$5,050,000	\$22.34
Small Urban + Large Urban (5,000-200,000)	782,427	43.78%	\$10,050,000	\$14,050,000	\$17.96
Rural (Less than 5,000)	597,088	33.41%	\$21,170,00	\$21,170,000	\$35.46

*TMA apportionment set by federal law

Table 3: Comparison of LPA Distributions to Population Share under Proposed Update to Board Policy 4028

Area	Population (2019)	Relative Share of Statewide Population	Relative Share of LPA Distribution Post-AUA	Per Capita Spending Post-AUA
Urban + TMA (Total Over 5,000)	1,189,977	66.59%	55.35%	\$21.15
TMA (200,000+)	407,550	22.81%	23.97%	\$27.24
Large Urban (50,000-200,000)	556,960	31.17%	19.44%	\$16.16
Small Urban (5,000-49,999)	225,467	12.62%	11.94%	\$22.34
Small Urban + Large Urban (5,000-200,000)	782,427	43.78%	31.38%	\$17.96
Rural (Less than 5,000)	597,088	33.41%	45.72%	\$35.46