

CHAPTER 7 Certification of the MPO Planning Process

2. Metropolitan Planning Organization Apportionment and Redesignation

Key Chapter Changes

The Metropolitan Planning Organization (MPO) Apportionment and Redesignation chapter was updated to streamline content and focus on the roles and responsibilities of District MPO Liaisons in the metropolitan transportation planning process. (April 3, 2026)

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2.1 Introduction

This chapter outlines the role of Florida Department of Transportation (FDOT) District Metropolitan Planning Organization (MPO) Liaisons in the MPO apportionment and redesignation process that follows each decennial census. MPO apportionment refers to the process for establishing how voting representation on an MPO's Governing Board is allocated among participating local governments. MPO redesignation is the formal process for restructuring and/or reapproving an MPO due to substantial changes to the MPO's voting membership or decision-making authority.

Effective July 1, 2025, Florida Statutes prohibit the designation of new MPOs in Florida, except within urban areas defined by the United States Census Bureau that are not contiguous to an urban area designated before the 2020 census. As urban areas expand, growing areas will instead be incorporated into existing Florida MPOs. As such, this chapter focuses on the federal and state requirements related to updating MPO membership, metropolitan planning area (MPA) boundaries, and MPO agreements following a census, as well as what constitutes a formal redesignation of an MPO.

District MPO Liaison responsibilities during the apportionment and redesignation processes include:

- ❖ Assisting MPOs in reviewing their MPA boundaries after each decennial census to determine if adjustments are needed,
- ❖ Providing support to MPOs during the development of their Apportionment Plans and reviewing the plans for compliance and completeness,
- ❖ Helping MPOs determine if new census data necessitates changes to existing MPO structure, and
- ❖ Coordinating the development, review, and submission of each of the MPO's standard agreements.

Table 2.1 Legal References for Redesignation and Apportionment

Citation	Description
<u>23 USC 134(d)</u>	Designation of metropolitan planning organizations
<u>23 CFR 450.310</u>	Metropolitan planning organization designation and redesignation
<u>s. 339.175(2), FS</u>	Metropolitan planning organization designation

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2.2 Census Designation of Urban Areas

Every 10 years, the United States Census Bureau conducts a census to determine the population of the United States. Approximately two years after the census is completed, the Census Bureau designates urban areas throughout the United States. For the 2020 census, an urban area is defined as areas comprising a densely settled core of census blocks encompassing at least 2,000 housing units or having at least 5,000 people. It is important to note that prior to the 2020 census, the Census Bureau distinguished between urbanized areas (areas with populations of 50,000 or more) and urban clusters (areas with populations between 2,500 and 50,000). As of the 2020 census, this distinction is no longer made. All qualifying areas are designated as urban areas. For more information, see the [Urban Area Criteria for the 2020 Census](#).

Urban area designations are critical to the administration of federal surface transportation programs. Key Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) planning programs impacted by urban area designations include:

- ❖ MPO redesignation,
- ❖ Application of metropolitan transportation planning requirements,
- ❖ FHWA and FTA funding availability and eligibility, and
- ❖ Application of air quality conformity requirements.

More information can be found on FHWA's [Census Urbanized Area and MPO/TMA Designation](#) website.

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2.3 MPO Redesignation

Federal law and regulations require the designation of an MPO in each urban area with a population of **50,000 or greater**. MPO **designation** is the initial agreement to establish an MPO made between the Governor and local governments representing at least **75 percent** of the urban area's population, including the largest incorporated city. This agreement formally recognizes the MPO as the policy board responsible for carrying out the metropolitan transportation planning process in the urban area. **Redesignation** occurs when an existing MPO proposes significant changes to its voting membership or decision-making authority. Redesignation ensures that the MPO's governing structure remains consistent with federal requirements and accurately reflects changes in population, representation, or organizational structure. Redesignation must also be approved by agreement between the Governor and local governments. Because the merging or consolidation of existing MPOs results in substantial changes to voting membership and decision-making authority, it is considered a redesignation based on federal regulations.

As described in **2.1 Introduction**, Florida law prohibits the designation of new MPOs in the state. Currently, Florida's 27 MPOs encompass all urban areas with populations over 50,000.

District MPO Liaison responsibilities regarding MPO redesignation include:

- ❖ Helping determine if proposed changes to the MPO will require redesignation,
- ❖ Facilitating the development, review, and execution of required redesignation agreements (described in more detail in **2.5 MPO Execution of Required Agreements**), and
- ❖ Maintaining communication between FDOT and the MPO and providing technical support to the MPO throughout the redesignation process.

Table 2.2 Legal References for MPO Designation and Redesignation

Citation	Description
<u>23 CFR 450.310</u>	Metropolitan planning organization designation and redesignation
<u>23 CFR 450.312</u>	Metropolitan Planning Area boundaries
<u>s. 339.175(2), FS</u>	Metropolitan planning organization designation

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2.4 Apportionment Plans

Federal law and regulations allow the state and local governments broad discretion to determine the composition of MPOs, subject to agreement between the Governor and affected local governments. Florida Statutes refer to this process as **apportionment**. Each MPO must review the composition of its membership in conjunction with the decennial census and develop and submit an Apportionment Plan that meets applicable federal and state requirements.

Table 2.3 Legal References for Membership Apportionment Plans

Citation	Description
<u>23 CFR 450.310</u>	Metropolitan planning organization designation and redesignation
<u>23 USC 134(d)</u>	Metropolitan transportation planning
<u>s. 339.175(3), FS</u>	Metropolitan planning organization voting membership
<u>s. 339.175(4), FS</u>	Metropolitan planning organization apportionment

After the completion of the decennial census, FDOT's Office of Policy Planning (OPP) will distribute the new urban area data to the MPOs, beginning a **180-day** process of preparing and submitting Apportionment Plans to FDOT. During this development process, District MPO Liaisons are responsible for:

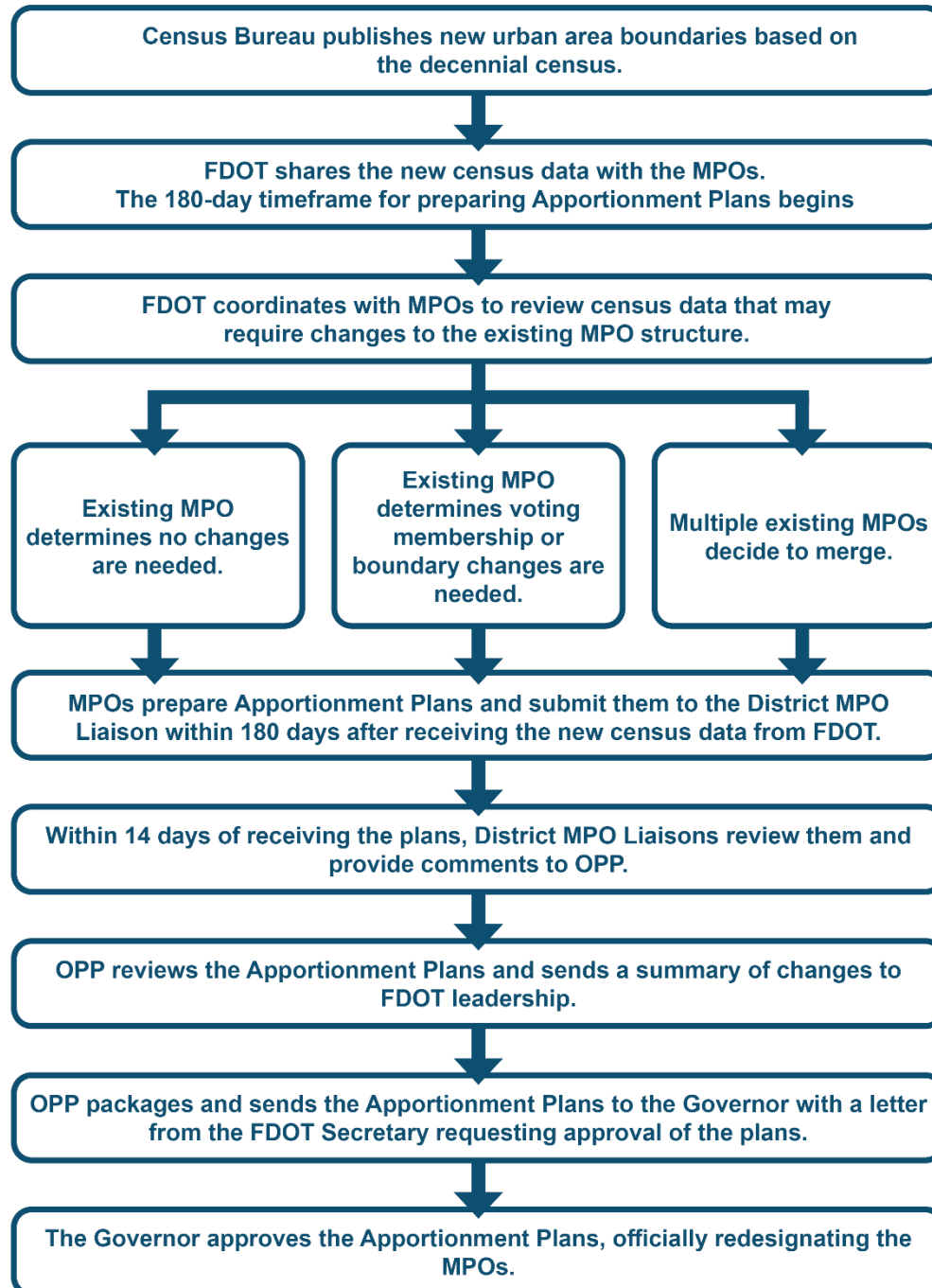
- ❖ Ensuring MPOs receive the new census data,
- ❖ Helping MPOs determine if the new data necessitates changes to existing MPO structure,
- ❖ Providing technical support as MPOs develop their Apportionment Plans, and
- ❖ Reviewing final Apportionment Plans and providing comments to OPP.

Figure 2.2 provides an overview of the timeline for Apportionment Plan development and approval following the 2020 census. These dates are subject to change for the 2030 census. **Figure 2.3** shows the general process for developing Apportionment Plans.

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Figure 2.1 Developing the MPO Membership Apportionment Plans



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2.4.1 Apportionment Plan Content

District MPO Liaisons are responsible for reviewing Apportionment Plans to ensure they include all required content. An Apportionment Plan review form and checklist are available on the [PATH website](#) to guide reviews of the plans. Generally, Apportionment Plans should include the following information:

- ❖ Population data for the MPO area from the previous two censuses,
- ❖ Current MPO Board membership,
- ❖ Proposed MPO Board membership,
- ❖ The methodology used to determine any proposed MPO Board membership changes (if there were proposed changes),
- ❖ MPA boundary map, and
- ❖ MPO Board resolution adopting the Apportionment Plan.

2.4.2 Metropolitan Planning Area Boundaries

Each MPO carries out the metropolitan transportation planning process within a defined MPA. The MPA must encompass the entire urban area plus the contiguous area expected to become urban within a **20-year horizon**. An MPA boundary may encompass more than one urban area. When the Census Bureau releases urban area designations after each decennial census, OPP will review and transmit the information to the MPOs. District MPO Liaisons should assist MPOs in reviewing their existing MPA boundaries to determine if they meet the minimum statutory requirements for new and updated urban areas. The boundaries should be adjusted as necessary.

Table 2.4 Legal References for MPA Boundaries

Citation	Description
23 CFR 450.312	Metropolitan planning area boundaries
23 USC 134(g)(4-5)	Coordination between MPOs

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The FDOT Transportation Data Analytics Office (TDA) has developed a statewide, web-based GIS application that provides the 2020 census urban area boundaries and population data for MPOs to update their existing MPA boundaries. This data can be found on the [Urban Area Boundary and Functional Classification Data Hub](#).

District MPO Liaisons should review MPA boundary maps as part of the Apportionment Plan review process. District MPO Liaisons should ensure that MPA boundary maps include relevant information, such as the MPA boundary, urban area boundaries, major city and county roads, interstates, and state highways. District MPO Liaisons should use the Apportionment Plan review form and checklist, available on the [PATH website](#), to guide reviews of MPA boundary maps. In accordance with federal regulations, OPP will provide copies of the maps to FHWA and FTA after the MPO and the Governor approve them.

2.4.2.1 Modification of MPO Boundary Maps

The MPO may initiate requests to modify the MPA boundary. OPP periodically releases population information from the [Bureau of Economic and Business Research Department at the University of Florida](#) that may be used to modify transportation planning boundaries.

District MPO Liaisons should note that any changes to the MPA boundaries may require the MPO to review and/or revise its voting apportionment, Long-Range Transportation Plan (LRTP), Transportation Improvement Program (TIP), Unified Planning Work Program (UPWP), and existing agreements and documents.

2.4.3 Membership Apportionment Plan Review

District MPO Liaisons should ensure that MPOs submit their final Apportionment Plans and MPA boundary maps to the District. District MPO Liaisons will have 14 days to review the plans and maps before submitting them to OPP for review. OPP will summarize voting membership or MPA boundary changes and report the information to FDOT Central Office leadership. Central Office leadership will then brief FHWA and FTA, confirm the point of contact for the Executive Office of the Governor (EOG), and provide a recommendation to approve the Apportionment Plans and maps to the EOG. If the Governor disapproves of any Apportionment Plans, the District shall assist in addressing any issues identified by the Governor.

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Table 2.5 Legal References for Membership Apportionment Plan Reviews

Citation	Description
<u>23 USC 134(d)(5)</u>	Metropolitan transportation planning
<u>s. 339.175(3), FS</u>	Metropolitan planning organization voting membership
<u>s. 339.175(4), FS</u>	Metropolitan planning organization apportionment

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2.5 MPO Execution of Required Agreements

Federal and state laws and regulations require MPOs to establish several formal agreements related to redesignation and apportionment. District MPO Liaisons are responsible for working with the MPO to develop each of the standard agreements described in this section. District MPO Liaisons shall coordinate a review of the agreements with District legal staff and FDOT's Comptroller Office (if needed) before transmitting for execution. The District shall request the MPO formally approve and sign each agreement and provide an appropriate number of copies to FDOT. District MPO Liaisons should ensure signed

District MPO Liaisons must ensure that the language contained in all standard agreements is not modified in any manner that impacts FDOT or changes the statutory duties and responsibilities of the MPO.

versions of all agreements are submitted to all relevant parties, including the MPO, FDOT District, OPP, and other signatories, as needed. The District Secretary (or designee) must sign each agreement, thereby executing the agreement for FDOT.

2.5.1 Interlocal Agreement

The Interlocal Agreement (**Form No. 525-010-01**, available in the [FDOT Procedural Document Library](#)), establishes the responsibilities of each agency involved in the metropolitan transportation planning process, pursuant to federal and state regulations. The parties to this agreement are FDOT and the governmental entities designated by the Governor for MPO membership, including non-voting members. This agreement must be updated and executed when an MPO is redesignated, or when an MPO adds or removes voting members from its board.

Table 2.6 Legal References for Interlocal Agreements

Citation	Description
23 CFR 450.314(a)	Metropolitan planning agreements
s. 163.01, FS	Florida Interlocal Cooperation Act of 1969
s. 339.175(2)(b), FS	Metropolitan planning organization designation
s. 339.175(10)(a-b), FS	Metropolitan planning organization agreements; accountability

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The Interlocal Agreement must be reviewed and updated (as necessary) by the parties at least every five years, concurrent with the decennial census and/or with a new federal reauthorization bill. District MPO Liaisons should advise MPOs on when updates to the agreement may be necessary. Changes that may require an MPO to update its Interlocal Agreement include:

- ❖ Adding a new urban area within the existing MPA boundary,
- ❖ Adding voting members to represent new local governments after MPA boundary expansion,
- ❖ Adding members to satisfy TMA membership requirements, and
- ❖ The periodic rotation of voting members representing local governments as established under the MPO's bylaws.

When updates to the Interlocal Agreement are needed, the District MPO Liaison is responsible for:

- ❖ Scheduling a meeting with MPO staff to discuss executing a new Interlocal Agreement after the Governor has approved the MPO's redesignation,
- ❖ Ensuring all local governments that are voting members of the MPO are reflected in the Interlocal Agreement, including any rotating voting memberships,
- ❖ Coordinating review of the Interlocal Agreement by District legal staff,
- ❖ Facilitating the District Secretary's signature of the agreement,
- ❖ Distributing copies to the approved agreement to the MPO, District, OPP, and each signatory to the agreement, and
- ❖ Verifying that the MPO and/or its members file the Interlocal Agreement with the Clerk of the Circuit Court in each county where a party to the agreement is located.

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2.5.2 Intergovernmental Coordination and Review and Public Transportation Coordination Planning Agreement (ICAR)

The Intergovernmental Coordination and Review and Public Transportation Coordination Planning Agreement (ICAR) Agreement ([Form No. 525-010-03](#), available in the [FDOT Procedural Document Library](#)) formalizes cooperation between FDOT, the MPO, regional planning council(s) (RPC), and local government agencies in the development of UPWPs, TIPs, LRTPs, and other applicable corridor or subarea studies. The ICAR Agreement also establishes a process through the RPC(s) for:

- ❖ Review and identification of inconsistencies between proposed MPO plans and local government comprehensive plans and
- ❖ Conflict and dispute resolution.

Table 2-7 Legal References for ICAR Agreements

Citation	Description
Chapter 163, FS	Intergovernmental Programs

ICAR Agreements have a term of five years. At the end of each five-year term, the agreeing parties review the agreement to either reaffirm it or agree to changes to the provisions. If changes are made, the ICAR Agreement will be amended.

2.5.3 Interstate Compact

Where the boundaries of the MPA span multiple states, the Governors of each state, the MPOs, and the public transportation operators must work cooperatively to coordinate transportation planning for the multistate area, including LRTP, TIP, and UPWP development. The states may enter into agreements or compacts for cooperative efforts and mutual assistance to support metropolitan planning activities, and they may establish agencies to implement the compacts or agreements.

Note: Currently, the only Florida MPO that is required to complete an Interstate Compact is the Florida-Alabama Transportation Planning Organization.

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Table 2.8 Legal References for Interstate Compacts

Citation	Description
<u>23 CFR 450.314(f)</u>	Metropolitan planning agreements