

Transportation Management Area (TMA) Certification Review

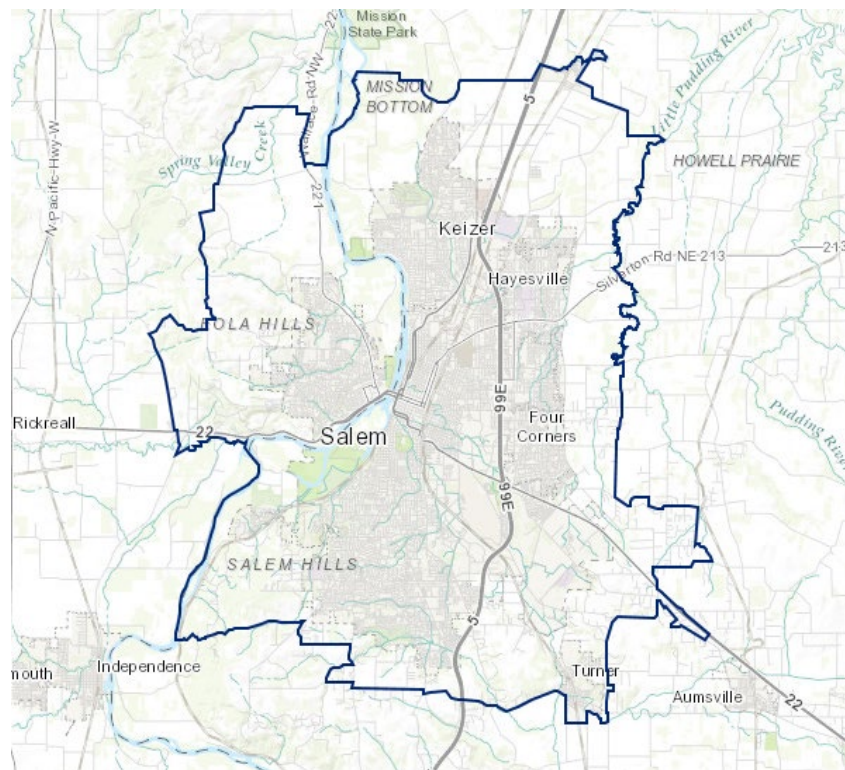


U.S. Department
of Transportation

**Federal Highway
Administration**

**Federal Transit
Administration**

Salem – Keizer Area Transportation Study (SKATS)



**Certification & Report Issued:
February 8, 2021**

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Executive Summary

As required in 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted a certification review of the Salem-Keizer Area Transportation Study (SKATS) transportation planning process for the Salem-Keizer urbanized area. Every four years, FHWA and FTA are required to jointly review and evaluate the SKATS transportation planning process, to ensure federal regulations are being implemented. Consistent with Federal regulations, the primary purpose of the Certification Review is:

- To formalize the continuing oversight and day-to-day evaluation of the planning process and document the findings and identify federal actions as needed,
- To ensure that the planning requirements of 23 U.S.C. 134 and 49 U.S.C. 5303 are being satisfactorily implemented, and
- To provide a valuable opportunity to provide advice and guidance to the planning partners in a TMA for enhancing the planning process and improving the quality of transportation investment decisions.

The Certification Review Team reviewed and evaluated the following topic areas to determine the scope of the certification review:

- Metropolitan Transportation Plan (MTP), including associated Performance-Based Planning and Programming (PBPP) requirements
- Congestion Management Process (CMP)
- Metropolitan Transportation Improvement Program (TIP), including associated Performance-Based Planning and Programming (PBPP) requirements
- Consultation Process

Based on the review and evaluation of the SKATS transportation planning process, the Certification Review Team finds the metropolitan planning process substantially meets the Federal transportation planning requirements per 23 U.S.C. 134 and 49 U.S.C. 5303. Therefore, FHWA and FTA jointly certify the regional transportation planning process to be compliant with the above-mentioned federal requirements for the next four years as of the date of this report, subject to the following corrective actions in Table 1.

The SKATS 2021 certification includes the following Federal findings:

- 6 Corrective actions
- 6 Recommendations
- 3 Commendations

The table below summarizes the Certification Review findings. A more detail discussion of each finding is included in the Federal Certification Review Team Findings section of this report.

Table 1 – Summary of 2021 Certification Review Findings

Planning Topic	SKATS 2021 Certification Findings	Due Date (if applicable)
Metropolitan Transportation Plan (MTP)	Corrective Action 1: By May 31, 2023, SKATS must prepare a system performance report as part of the next MTP update that evaluates the condition and performance of the transportation system with respect to the performance targets described in subsection 450.306(d), including progress achieved in meeting the performance targets, an analysis of how the MTP has improved the conditions and performance of the transportation system, and how changes in local policies and investments have impacted the costs necessary to achieve the identified performance targets, as required in 23 CFR 450.324(f)(4).	May 31, 2023
	Corrective Action 2: By May 31, 2023, SKATS must document the consultation with applicable agencies and officials, including Tribal governments, during the development of the MTP, as required in 23 CFR 450.316(b)-(d), 23 CFR 450.324(f)(10), and 23 CFR 450.324(g).	May 31, 2023
	Recommendation 1: It is recommended SKATS document capital and operational strategies to ensure that the existing and future metropolitan transportation system's infrastructure is maintained and preserved in the long-term.	
	Recommendation 2: It is recommended SKATS address all federal planning factors and document how factors are considered in determining projects and strategies as part of the metropolitan transportation planning process (23 CFR 450.306(c)). Specifically, the plan must address: (9) Improve the resiliency and reliability of the transportation system and reduce or mitigate storm water impacts of surface transportation; and (10) Enhance travel and tourism (23 CFR 450.306(c)(9) and (10)).	
	Recommendation 3: It is recommended SKATS document how the metropolitan transportation planning process is consistent with the development of applicable Regional Intelligent Transportation Systems (ITS) (23 CFR 450.306(g); how the Human Services Transportation Plan was coordinated and consistent with the metropolitan transportation planning process (23 CFR 450.306(h); and identify strategies to preserve the existing and projected future of metropolitan transportation infrastructure (23 CFR 450.324(f)(7)).	

Planning Topic	SKATS 2021 Certification Findings	Due Date (if applicable)
	Commendation 1: SKATS MPO has made improvements to the adopted MTP since the last certification review, including greater consideration of accessible pedestrian walkways and bicycle transportation facilities, and working with local jurisdictions to complete inventories of ADA curb ramps.	
Congestion Management Process (CMP)	Corrective Action 3: By May 31, 2023, SKATS must implement a congestion management process that provides greater emphasis on multimodal performance measures, includes effective management and operation, and is based on a cooperatively developed and implemented metropolitan-wide strategy as required in 23 CFR 450.322.	May 31, 2023
	Corrective Action 4: By May 31, 2023, SKATS must establish a coordinated program for data collection and system performance monitoring to define the extent and duration of congestion and evaluate the efficiency and effectiveness of implemented actions as required in 23 CFR 450.322(d)(3).	May 31, 2023
	Corrective Action 5: By May 31, 2023, SKATS must document methods to identify an implementation schedule, implementation responsibilities, and assessment of the effectiveness of implemented strategies as required in 23 CFR 450.322(d)(5), 23 CFR 450.322(d)(6).	May 31, 2023
	Recommendation 4: It is recommended SKATS continue to utilize the Regional Operational Characteristic Report (ROCR) or equivalent data source for ongoing system evaluation, monitoring and regularly reporting, specifically how, when, and where the data and analysis applies to the congestion management process.	
Transportation Improvement Program (TIP)	Recommendation 5: It is recommended SKATS identify regionally significant and non-exempt projects for air quality conformity purposes (23 CFR 450.326(f)).	
	Recommendation 6: It is recommended SKATS provide additional documentation to fully meet TIP development requirements, including prioritizing and documenting how SKATS will link investment priorities to targets (23 CFR 450.326(d)).	
	Commendation 2: SKATS is commended for issuing award letter to each project sponsor identifying a list of requirements that will need to be met, including: intergovernmental agreement prior to the year of the first project phase; ODOT	

Planning Topic	SKATS 2021 Certification Findings	Due Date (if applicable)
	Local Agency Liaison Coordination needed to obligate funds in the year programmed; need to notify SKATS staff of any changes to the scope, schedule, or costs that affect project delivery, and opportunity to work with the TIP manager to ensure projects are on time and avoid delays.	
	Commendation 3: SKATS is commended for adopting a virtual approach to public involvement for the recent adoption of the 2021-2026 TIP to address constraints during the COVID-19 pandemic. The virtual open house included an interactive project map that provided an opportunity for the public to comment on a project. As a result, public participation for the 2021-2026 TIP, despite the COVID-19 constraints, was much higher than expected.	
Consultation Process	By May 31, 2022, SKATS must finalize the <i>Consultation Process for use During Development of the SKATS RTSP and TIP</i> , including more explicit information on procedures for Tribal government consultation and correction of editorial errors, to meet all requirements in 23 CFR 450.316(b-e), 23 CFR 450.324(g).	May 31, 2022

Background

Since the enactment of the Intermodal Surface Transportation Efficiency Act of 1991, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) are required to jointly review, evaluate, and certify the transportation planning process in all Transportation Management Areas (TMAs), urbanized areas over 200,000 in population, to determine if the process meets the Federal planning requirements in 23 U.S.C. 134, 49 U.S.C. 5303, and 23 CFR 450. Pursuant to 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), FHWA and FTA must jointly certify the metropolitan transportation planning process in TMAs at least once every four years. Certification of the planning process is a prerequisite to the approval of Federal funding for transportation projects in such areas.

The Certification Review focuses on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the MPO, the State DOT, and public transportation operator(s) in conducting the metropolitan transportation planning process. It also an opportunity to assist on new programs and to enhance the ability of the metropolitan transportation planning process to provide decision makers with the knowledge they need to make well-informed capital and operating investment decisions.

The Certification Review process is one of several methods used to assess the quality of a regional metropolitan transportation planning process, compliance with applicable statutes and regulations, and the level and type of technical assistance needed to enhance the effectiveness of the planning process. The review process is individually tailored to focus on topics of significance in each metropolitan planning area. Federal reviewers prepare Certification Reports to document the results of the review process. The report and final actions are the joint responsibility of the FHWA and FTA field offices, and their content will vary to reflect the planning process reviewed.

Other activities provide opportunities for this type of review and comment on the Unified Planning Work Program (UPWP) (also includes approval), the Metropolitan Transportation Plan (MTP), Metropolitan Transportation Improvement Program (TIP), Statewide Transportation Improvement Program (STIP) findings, air-quality (AQ) conformity determinations (in nonattainment and maintenance areas), as well as a range of other formal and less formal contacts. The results of these other processes are considered in the Certification Review process. While the Certification Review report itself may not fully document these ongoing checkpoints, the findings and federal actions of the Certification Review are based upon the cumulative findings of the entire review effort.

This report documents the major Findings and Federal actions of the 2021 TMA Planning Certification review of SKATS. It also provides a review of the 2016 TMA Planning Certification review and validates corrective actions have been taken and that findings are closed.

Certification Process

Federal Certification Review Team Members

- Jasmine Marie Harris, Transportation Planner, FHWA Oregon Division
- Rachael Tupica, Team Leader / Senior Planner, FHWA Oregon Division
- Theresa Hutchins, Community Planner, FHWA Office of Planning
- Ned Conroy, Transportation Program Specialist, FTA Region 10
- Jeremy Borrego, Transportation Program Specialist, FTA Region 10

Scope of Review

The Federal Certification Review Team determined the scope of the review would be to evaluate compliance of the 2016 SKATS Certification Review Findings which FHWA and FTA had not already considered resolved. Of the five corrective actions issued in 2016, corrective action 4 regarding the Public Participation Plan was resolved and signed off on prior to the certification review. The remaining four corrective actions were reviewed and evaluated during the 2021 certification review.

As part of the Certification Review Team's coordination with the Oregon Department of Transportation (ODOT), ODOT issued a letter on April 17, 2020 to the FHWA and the FTA indicating that they have reviewed SKATS' response to the corrective actions from the 2016 SKATS Certification Review and provided a status update from their perspective. FHWA and FTA considered ODOT's recommendations and included the information as part of the 2021 SKATS Certification Review.

To evaluate the remaining four outstanding corrective actions, the Certification Review Team reviewed the following documents and processes as part of this certification review:

- SKATS 2019-2043 Regional Transportation Systems Plan (RTSP), adopted by the Policy Committee on May 28, 2019
- 2019/2020 Congestion Management Process (CMP), not adopted by the Policy Committee
- SKATS 2021-2026 Metropolitan Transportation Improvement Program (TIP), adopted by the Policy Committee on May 26, 2020
- Consultation Process for use during the development of the SKATS RTSP and TIP (February 2020), not adopted by the Policy Committee.

Onsite Review

On June 17-18, 2020, the Certification Review Team conducted the virtual site review, using Microsoft Teams, with the following participants:

- Mike Jaffe, Transportation Program Director, SKATS
- Karen Odenthal, Senior Planner, SKATS
- Ray Jackson, Senior Planner, SKATS
- Kimberley Sapunar, SKATS

- Erik Havig, Planning Section Manager, ODOT
- Lisa Nell, Region 2, Planning and Development Manager, ODOT
- Dan Fricke, Region 2, Senior Region Planner, ODOT
- Naomi Zwerdling, Crossing-Safety Manager, ODOT
- Arla Miller, Regional Transit Coordinator, ODOT
- Steve Dickey, Director of Transportation Development, Cherriots
- Chris French, Senior Planner, Cherriots

Following the review, the SKATS staff provided PowerPoint presentations summarizing their RTSP, CMP, Consultation Process, and TIP.

Public Comments

Pursuant to CFR 450.336(b)(4) the Certification Review requires opportunities for public comments and feedback from the public, committee members, and other stakeholders on how the transportation planning process is conducted in the Salem-Keizer urbanized area.

SKATS agreed to utilize their public involvement process to fulfill this requirement. The Certification Review Team provided a public notice containing review dates, FHWA/FTA contact information, and a SKATS point of contact for individuals with disabilities requiring auxiliary aids for services. The public comment period was open from May 13 through June 18, 2020 and was advertised and conducted online. Below is a summary documenting the public comment opportunities (see Appendix A for comments received).

- May 13, 2020 - Posted on the [Mid-Willamette Valley Council of Governments \(MWVCOG\) Facebook](#).
- May 13, 2020 - Email sent to the SKATS Technical Advisory Committee (TAC) and Policy Committee (PC) Members, and interested parties through a distribution list.
- Need date - Posted Certification Review dates on the MWVCOG Calendar.
- May 18, 2020 - Included Public Notice in the MWVCOG Connection Newsletter
- May 19, 2020 - E-mailed Cherriots to share with their Board and Management members.
- May 26, 2020 – Included Public Notice as part of the PC Meeting Packet.
- May 24, 2020 - Included Public Notice in local blog, “Breakfast on Bikes,” focusing on transportation issues in the Salem area.
- June 15, 2020 - Included Public Notice in the MWVCOG Connection Newsletter.

Certification Report

FHWA and FTA issue a certification report that documents the results of the certification review. The report includes the findings for each topic reviewed.

Findings - are statements of fact that define the conditions found during the data-gathering phase of the review. These statements provide the primary basis for determining the Federal actions contained in the Certification Report. Certification reviews can result in Federal actions that include Corrective Actions, Recommendations, and Commendations.

Based on the findings of each topic, FHWA and FTA may issue corrective actions, recommendations, and/or commendations.

Corrective Actions – are Federal planning regulation deficiencies that could, if not adequately addressed, impact USDOT certification and provide tasks for the TMA to undertake to rectify these conditions in a prescribed timeframe.

Recommendations – are proposals to enhance existing compliant processes.

Commendations – are observations of best practices or exemplary work that is accomplished by the MPO.

Follow-up to the Final Certification Report

SKATS is responsible for addressing all corrective actions by the due date in this certification report. ODOT, as an oversight agency for SKATS, is responsible for ensuring corrective actions are being sufficiently addressed by the identified deadline. FHWA and FTA are committed to working closely with SKATS and ODOT to ensure expectations are understood, provide stewardship and technical assistance, and to establish a framework for the resolution of corrective actions and recommendations resulting from this certification review.

FHWA and FTA will use the following process to present the findings and monitor and ensure corrective actions are resolved by the due date identified in this certification report.

1. FHWA and FTA jointly present the findings in the final report to the SKATS, ODOT, and Cherriots (the public transportation provider in the Salem Metropolitan Area) to ensure understanding of the findings and federal actions, deadlines, and expectations. FHWA and FTA will also present the findings to the SKATS Policy Board.

2. SKATS develops a plan of action, to be included in the Unified Planning Work Program (UPWP), that demonstrates how the MPO can resolve corrective actions by the due dates specified in this report. Although not a current compliance issue, SKATS is encouraged to implement recommendations as they are often made to support the MPO in undertaking foundational planning and programming practices. SKATS should indicate how recommendations will be implemented.

A plan of action in the UPWP will be used as a tool for interagency coordination and communication, ensuring the MPO allocates sufficient funding and resources to resolve findings, and accountability to ensure performance goals are met by established deadlines.

The plan of action should include the following elements:

- Target Date specified in the corrective action(s).
- Quarterly reporting on progress.
- Task(s) needed to resolve corrective action(s) with the lead person/agency identified.
- Deliverable(s) and dates of products/processes.
- Timeline of expected completion date of tasks.

- Training/Technical Assistance Needs.
- List of any resources needed, such as additional staff or consultant assistance.

3. SKATS is encouraged to form a certification action team composed of local, state, and Federal partners to assist in the successful and timely resolution of findings. The certification action team should meet on a routine basis to ensure timely progress on findings.

4. ODOT, as the pass-through and oversight agency for the SKATS, is responsible for ensuring compliance of the processes with applicable Federal requirements, monitoring the achievement of performance goals, and ensuring SKATS sufficiently addresses compliance issues by the identified deadline. After the SKATS Policy Board and ODOT have determined that corrective actions have been sufficiently addressed, SKATS should formally request ODOT review updated processes and related documents.

5. Upon ODOT's review and determination that SKATS processes and documents comply with the Federal requirements and sufficiently address the corrective actions identified in this report, ODOT should send a letter to FHWA and FTA with a recommendation to close out the corrective action(s).

6. FHWA and FTA review ODOT's request to close out the corrective action(s) and supporting documentation and issue a letter with a determination that:

- The corrective action(s) has been sufficiently addressed, or
- The corrective action(s) has not been sufficiently addressed and documents outstanding compliance issues.

Findings

Metropolitan Transportation Plan (MTP)

Regulatory Basis

23 U.S.C. 134(c), (h) & (i) and 23 CFR 450.324 set forth requirements for the development and content of the Metropolitan Transportation Plan (MTP). Among the requirements are that the MTP address at least a 20-year planning horizon and that it includes both long and short range strategies that lead to the development of an integrated and multi-modal system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.

The MTP is required to provide a continuing, cooperative, and comprehensive multimodal transportation planning process. The plan needs to consider all applicable issues related to the transportation systems development, land use, employment, economic development, natural environment, and housing and community development. 23 CFR 450.324(c) requires the MPO to review and update the MTP at least every four years in air quality nonattainment and maintenance areas and at least every 5 years in attainment areas to reflect current and forecasted transportation, population, land use, employment, congestion, and economic conditions and trends.

Under 23 CFR 450.324(f), the MTP is required, at a minimum, to consider the following:

- Projected transportation demand
- Existing and proposed transportation facilities
- Operational and management strategies
- Congestion management process
- Capital investment and strategies to preserve transportation infrastructure and provide for multimodal capacity
- Design concept and design scope descriptions of proposed transportation facilities
- Potential environmental mitigation activities
- Pedestrian walkway and bicycle transportation facilities
- Transportation and transit enhancements
- A fiscally constrained financial plan

Current Status

The 2019-2043 Regional Transportation System Plan (RTSP), including conformity determination analysis, was adopted by the SKATS Policy Committee (PC) on May 28, 2019. The RTSP was developed to meet both state and federal planning requirements and hereafter is referred to as the Metropolitan Transportation Plan (MTP). Significant improvements were made toward addressing the corrective action identified in 2016, listed below, including expanding regional goals, objectives, and performance measures; identifying deficiencies in safety, system preservation, and non-motorized transportation; and improving the financial

constraint analysis. As part of the current review, the Federal Review Team found that the MTP did not adequately address several topics.

2016 Corrective Action 1 – Metropolitan Transportation Plan: *By May 31, 2019, with the update of the MTP, SKATS must clearly document an integrated, regional transportation planning process, including all supporting analysis, to meet the requirements of 23 CFR 450.324. The MTP should include documentation on: the clear integration of Federal planning factors; the use of the plan’s vision, goals, objectives, and indicators in the decision-making process; and consultation processes. The plan should also include a more fully developed financial plan and further discussion of the linkage between the CMP and RTSP.*

Findings

- SKATS determines conformity of the Metropolitan Transportation Plan (MTP) every four years as required in 40 CFR 93.104(b)(3) and 23 CFR 450.324(c). The area is currently designated as attainment for carbon monoxide (CO) with an approved Limited Maintenance Plan. Based on EPA requirements, SKATS prepared a Limited Maintenance Plan which does not require the conformity analysis to include a regional emissions analysis. FHWA and FTA issued a joint conformity determination for the 2019-2043 MTP on March 2, 2020.
- SKATS worked closely with ODOT and local transportation planning agencies to develop the 2019-2043 MTP through active participation of Technical Advisory Committee (TAC) and Policy Committee (PC) meetings. A working group was formed to update population, employment and land use forecasts through 2043.
- SKATS held a public hearing for the 2019-2043 MTP on May 28, 2019 and the public comment period was open between April 23, 2019 and May 28, 2019 (35 days), receiving 104 comments. The MTP outreach plan outlines details of public involvement activities, events, meetings, dates, number of public comments broken down by week, outreach status updates and public comments received.
- The MTP includes data to support an environmental justice analysis, identifying the benefits and/or burdens of projects/programs selected for funding.
- The MTP addresses Performance-Based Planning and Programing (PBPP) requirements by referencing and describing USDOT national goals, performance measures and regional targets, and developed a project selection framework to demonstrate how SKATS will make progress on the performance measure targets.
- The MTP did not include a system performance report evaluating the condition and performance of the transportation system or analyze progress achieved by the metropolitan planning organization in meeting the performance targets.
- The MTP does not fully address the following federal planning factors: (9) Improve the resiliency and reliability of the transportation system and reduce or mitigate storm water impacts of surface transportation; and (10) Enhance travel and tourism.
- The MTP references the 2005 Salem-Keizer Metropolitan Area Intelligent Transportation System (ITS) Plan and indicates an ITS project list was updated in a separate document in 2017. However, the MTP does not sufficiently document how the metropolitan

transportation planning process is consistent with the development of applicable Regional Intelligent transportation systems (ITS) Architectures.

- The MTP utilizes the most recent available forecasts for population, employment, land use, and economic activity, and documents existing and proposed transportation facilities that would support an integrated metropolitan transportation system.
- The MTP includes a financial assessment of proposed capital investment but lacks strategies to preserve the existing and projected future of metropolitan transportation infrastructure.
- The MTP includes funding forecasts of FHWA, FTA, ODOT, and local funding covering the time of the plan as well as cost estimates / expected expenditures by year of expenditure (YOE).
- The MTP includes both short- and long-range strategies that provide for the integration of accessible pedestrian walkways and bicycle transportation facilities to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.
- The MTP includes locations of ADA curb ramp and bike and pedestrian facilities as part of the current system and future needs for pedestrian/ADA infrastructure and bicycle transportation facilities, but lacks documentation of analysis for the purposes of planning and project decision-making.
- The MTP doesn't include documentation of the required formal consultation process.

Corrective Action 1:

By May 31, 2023, SKATS must prepare a system performance report as part of the next MTP update that evaluates the condition and performance of the transportation system with respect to the performance targets described in subsection 450.306(d), including progress achieved in meeting the performance targets, an analysis of how the MTP has improved the conditions and performance of the transportation system, and how changes in local policies and investments have impacted the costs necessary to achieve the identified performance targets, as required in 23 CFR 450.324(f)(4).

Corrective Action 2:

By May 31, 2023, SKATS must document the consultation with applicable agencies and officials, including Tribal governments, during the development of the MTP, as required in 23 CFR 450.316(b)-(d), 23 CFR 450.324(f)(10), and 23 CFR 450.324(g).

Recommendation 1:

It is recommended SKATS document capital and operational strategies to ensure that the existing and future metropolitan transportation system's infrastructure is maintained and preserved in the long-term.

Recommendation 2:

It is recommended SKATS address all federal planning factors and document how factors are considered in determining projects and strategies as part of the metropolitan transportation planning process (23 CFR 450.306(c)). Specifically, the plan must address: (9) Improve the resiliency and reliability of the transportation system and reduce or mitigate storm water impacts of surface transportation; and (10) Enhance travel and tourism (23 CFR 450.306(c)(9) and (10)).

Recommendation 3:

It is recommended SKATS document how the metropolitan transportation planning process is consistent with the development of applicable Regional Intelligent Transportation Systems (ITS) (23 CFR 450.306(g); how the Human Services Transportation Plan was coordinated and consistent with the metropolitan transportation planning process (23 CFR 450.306(h); and identify strategies to preserve the existing and projected future of metropolitan transportation infrastructure (23 CFR 450.324(f)(7)).

Commendation 1:

SKATS MPO has made improvements to the adopted MTP since the last certification review, including greater consideration of accessible pedestrian walkways and bicycle transportation facilities, and working with local jurisdictions to complete inventories of ADA curb ramps.

Congestion Management Process (CMP)

Regulatory Basis

23 U.S.C. 134(k)(3) and 23 CFR 450.322 set forth requirements for the congestion management process (CMP) in TMAs. The CMP is a systematic approach for managing congestion through a process that provides for a safe and effective integrated management and operation of the multimodal transportation system. TMAs designated as non-attainment for ozone or carbon monoxide must also provide an analysis of the need for additional capacity for a proposed improvement over travel demand reduction, and operational management strategies.

23 CFR 450.324(f)(5) requires the MTP include Management and Operations (M&O) of the transportation network as an integrated, multimodal approach to optimize the performance of the existing transportation infrastructure. Effective M&O strategies include measurable regional operations goals and objectives and specific performance measures to optimize system performance.

Current Status

Following the 2016 SKATS TMA Certification Review, the FHWA coordinated a two-day SKATS Congestion Management Process (CMP) Peer Exchange including participation from SKATS, ODOT, and three other MPOs on November 28 and 29, 2018. At the time of the certification review, the current draft CMP was updated in 2019 and 2020 but has not been adopted by the Policy Committee. The Draft CMP document addresses many of the issues raised in 2016 including identifying objectives related to the MTP goals, determining strategies for regional or corridor-level implementation, and developing a process to evaluate the efficiency and effectiveness of implemented actions. However, the CMP has not been fully developed, nor vetted or approved by the SKATS Policy Committee and, as a result, has not been implemented.

2016 Corrective Action 3 – Congestion Management Process (CMP): By May 31, 2019, with the update of the MTP, SKATS must make the following improvements to the congestion management process to meet the requirements of 23 CFR 450.322:

- *Congestion management objectives,*
- *Evaluation of alternative strategies,*

- *Evaluation of the effectiveness of congestion reduction strategies with established performance measures, and*
- *Evaluation of the efficiency and effectiveness of implemented actions*

Findings

- Following the 2016 SKATS TMA Certification Review, the FHWA coordinated a two-day SKATS Congestion Management Process (CMP) Peer Exchange including participation from SKATS, ODOT, and three other MPOs on November 28 and 29, 2018.
- The current CMP Plan was updated in 2019/2020, is incomplete, and has not been adopted by the Policy Committee or implemented by the MPO. A CMP Plan is a good way to document the congestion management process.
- The CMP Plan does not address how the process is integrated into the long-range planning and short-range programming system analysis and decision-making processes.
- Previous CMP documentation was reflected in the Regional Operational Characteristic Report (ROCR) as a source of ongoing regional congestion data and analysis. The ROCR has not been updated since 2012, using data from 2007-2010, and is not currently used. It is unclear how CMP progress will be documented moving forward.
- The CMP documentation lacks methods to evaluate alternative strategies and does not evaluate the effectiveness of implemented actions based on established performance measures.
- The congestion management process does not identify an implementation schedule and responsibilities, and does not include an assessment of the effectiveness of implemented strategies.
- The CMP Plan documents two performance measures Travel time index and Planning Time Index and states there's a potential for additional measures as underlying data becomes available. Additional measures could fall into the following categories: transit ridership, sidewalk and bicycle facilities, congestion, and some of the Federal performance measures.
- The CMP Plan lacks an established coordinated program for data collection to fully implement a systematic, multimodal congestion management approach based on a cooperatively developed and implemented metropolitan-wide strategy. The Plan mentions new measures and analysis that could be put in place if additional data were available.

Corrective Action 3:

By May 31, 2023, SKATS must implement a congestion management process that provides greater emphasis on multimodal performance measures, includes effective management and operation, and is based on a cooperatively developed and implemented metropolitan-wide strategy as required in 23 CFR 450.322.

Corrective Action 4:

By May 31, 2023, SKATS must establish a coordinated program for data collection and system performance monitoring to define the extent and duration of congestion and evaluate the efficiency and effectiveness of implemented actions as required in 23 CFR 450.322(d)(3).

Corrective Action 5:

By May 31, 2023, SKATS must document methods to identify an implementation schedule, implementation responsibilities, and assessment of the effectiveness of implemented strategies as required in 23 CFR 450.322(d)(5), 23 CFR 450.322(d)(6).

Recommendation 4:

It is recommended SKATS continue to utilize the Regional Operational Characteristic Report (ROCR) or equivalent data source for ongoing system evaluation, monitoring and regularly reporting, specifically how, when, and where the data and analysis applies to the congestion management process.

Transportation Improvement Program (TIP)

Regulatory Basis

The MPO is required, under 23 CFR 450.326, to develop a Transportation Improvement Program (TIP) in cooperation with the State and public transit operators. 23 U.S.C. 134(c), (h) & (j) set forth requirements for the MPO to cooperatively develop a Transportation Improvement Program (TIP). Under 23 CFR 450.326, the TIP must meet the following requirements:

- Must cover at least a four-year horizon and be updated at least every four years;
- Include surface transportation projects funded under Title 23 U.S.C. or Title 49 U.S.C., except as noted in the regulations, are required to be included in the TIP;
- List project description, total project cost, funding source(s), and identification of the agency responsible for carrying out each project;
- Projects need to be consistent with the adopted MTP;
- Must be fiscally constrained by year; and
- The MPO must provide all interested parties with a reasonable opportunity to comment on the proposed TIP.

Current Status

The 2021-2026 Transportation Improvement Program (TIP) was adopted by the SKATS Policy Committee on May 26, 2020. FHWA and FTA reviewed the conformity determination documentation included in the TIP in advance of issuing a joint conformity determination for the 2021-2026 TIP. Substantial revisions were made to the updated TIP to address the 2016 corrective action, listed below, including providing documentation that adequate funding is available by year to operate and maintain the system, and establishing a process to deliver projects on the schedule proposed in the TIP to meet financial planning requirements identified in 23 CFR 450.326.

***2016 Corrective Action 2 – Transportation Improvement Program:** By July 1, 2020, with the update of the next TIP, SKATS must provide clear documentation that adequate funding is available by year to operate and maintain the system and to deliver projects on the schedule proposed in the TIP to meet all financial planning and fiscal constraint requirements identified in 23 CFR 450.326.*

Findings

- The 2021-2026 TIP, including conformity determination analysis, was adopted by the SKATS Policy Committee (PC) on May 26, 2020. Signed resolutions 20-13, and 20-14 were included in the final TIP, and posted on the website. FHWA and FTA reviewed the conformity determination documentation included in the TIP in advance of issuing a joint conformity determination for the 2021-2026 TIP.
- Public participation documentation includes public comments received and responded to, and reports a virtual open house to complete planned public outreach activities in response to COVID-19. A public hearing via phone was held on May 26, 2020 and the public comment period was open between March 24, 2020 and May 17, 2020 (65 days).
- As part of the TIP's public involvement process, SKATS received 7 emails, two letters (one from a public citizen and the other from Safer Routes Partnership), 58 comments from the online Open House, 56 comments from the interactive map, and 42 "Likes" from the online interactive map.
- The SKATS TIP includes a detailed project list of capital and non-capital transportation projects by phase, type of work, estimated total project cost, identification of the agencies responsible for carrying out the project, and amount of Federal and non-federal funds proposed to be obligated during each program year.
- Documentation includes the criteria and process for prioritizing projects for inclusion in the 2021-2026 TIP and a list of 2018-2024 major projects from the previous TIP. Also, includes a description and matrix to establish TIP management process which captures procedures for TIP Amendments, Adjustment and Administrative Modifications.
- The 2021-2026 TIP addresses PBPP requirements by listing FHWA and FTA performance measures and targets, provides a description how TIP projects will help achieve safety, system reliability, CMAQ emissions, and asset management.
- Includes high level descriptions as to how projects in the TIP will help achieve Safety, Pavement, and Bridge Condition, System Reliability, CMAQ Emissions, and Transit Asset Management (TAM) Targets by capturing available funding to SKATS for each of these areas, generally addressing how SKATS will link investment priorities to established performance targets.
- The TIP does not identify projects that are regionally significant or non-exempt in terms of air quality conformity. Since SKATS is a Limited Maintenance area, it is not required to do regional air quality modeling or analysis.
- The TIP includes an analysis addressing TIP and MTP consistency and TIP project applications includes an eligibility question regarding TIP and MTP consistency.

Recommendation 5:

It is recommended SKATS identify regionally significant and non-exempt projects for air quality conformity purposes (23 CFR 450.326(f)).

Recommendation 6:

It is recommended SKATS provide additional documentation to fully meet TIP development requirements, including prioritizing and documenting how SKATS will link investment priorities to targets (23 CFR 450.326(d)).

Commendation 2:

SKATS is commended for issuing award letter to each project sponsor identifying a list of requirements that will need to be met, including: intergovernmental agreement prior to the year of the first project phase; ODOT Local Agency Liaison Coordination needed to obligate funds in the year programmed; need to notify SKATs staff of any changes to the scope, schedule, or costs that affect project delivery, and opportunity to work with the TIP manager to ensure projects are on time and avoid delays.

Commendation 3:

SKATS is commended for adopting a virtual approach to public involvement for the recent adoption of the 2021-2026 TIP to address constraints during the COVID-19 pandemic. The virtual open house included an interactive project map that provided an opportunity for the public to comment on a project. As a result, public participation for the 2021-2026 TIP, despite the COVID-19 constraints, was much higher than expected.

Consultation

Regulatory Basis

The requirements for consultation are set forth primarily in 23 CFR 450.316(b-e) which calls for consultation in developing the MTP and TIP. Consultation is also addressed specifically in connection with the MTP in 23 CFR 450.324(g) and (f)(10) related to environmental mitigation. 23 U.S.C. 134(g) & (i)(5)-(6) and 23 CFR 450.316(b-e) set forth requirements for consultation in developing the MTP and TIP. Consultation is also addressed specifically in connection with the MTP in 23 CFR 450.324(h) and in 23 CFR 450.324(g)(10) related to environmental mitigation. In developing the MTP and TIP, the MPO shall, to the extent practicable, develop a documented process that outlines roles, responsibilities, and key decision points for consulting with other governments and agencies as described below:

- Agencies and officials responsible for other planning activities (State, local, economic development, environmental protection, airport operations, or freight);
- Indian Tribal Governments;
- Federal land management agencies; and
- Other providers of transportation services.

Current Status

A draft consultation document was written to address the 2016 corrective action, listed below, entitled *Consultation Process for Use during Development of the SKATS RTSP and TIP*. The document identifies several applicable agencies in which consultation is required. While the consultation process includes many required components, the document lacks specific steps and actions the SKATS MPO will take to reach out to all applicable agency stakeholders as part of the development of the MTP and TIP.

2016 Corrective Action 5 - Consultation: *By December 31, 2017, SKATS shall develop and document a formal consultation process for the MPO to meet all requirements in 23 CFR 450.316(b-e), 23 CFR 450.324(g)(10), and in 23 CFR 450.324(h).*

Findings

- In response to the 2016 SKATS TMA Certification Review, SKATS drafted a formal consultation process and is captured in the document titled *Consultation Process for use During Development of the SKATS RTSP and TIP (last updated in February 2020)*. Although SKATS has made significant progress, documentation of the process has not been completed and was not adopted by the Policy Committee.
- The *Consultation Process for use During Development of the SKATS RTSP and TIP* document generally identifies a list of applicable required agencies by group: Tribal Government, General Transportation, Environmental Mitigation, Air Quality Conformity Determination, and Cultural, Historical, and Environmental Consultation.
- The definition of consultation used in the *Consultation Process for use During Development of the SKATS RTSP and TIP* is not the correct definition.
- The *Consultation Process for use During Development of the SKATS RTSP and TIP* document indicates SKATS received 8 responses to their survey as to a preferred method of consultation for the development of the MTP and 5 responses for the development of the TIP.
- The 2021-2026 TIP documents how the consultation process was implemented by describing their method utilized to consult with applicable agencies and indicated the U.S. Army Corps of Engineers provided updated contact information and the Oregon Department of Fish and Wildlife responded with “no comment.”
- The 2019-2043 MTP indicates an e-mail was sent out to the consultation and Tribal Government contact list and one comment was received from the Department of State Lands.
- During the certification review, MPO staff noted having a separate consultation process document they use from what was shared for the certification review.
- In Table 5 “Consults With” column included many incorrect references to other tables, which could impact the consultation process significantly.
- The *Consultation Process for use During Development of the SKATS RTSP and TIP* doesn’t include the points of contact SKATS consults with at the consultation agencies.

Corrective Action 6:

By May 31, 2022, SKATS must finalize the *Consultation Process for use During Development of the SKATS RTSP and TIP*, including more explicit information on procedures for Tribal government consultation and correction of editorial errors, to meet all requirements in 23 CFR 450.316(b-e), 23 CFR 450.324(g).

Appendix A – Public Comments

From: [Kathryn Lincoln](#)
To: [Harris, Jasmine \(FHWA\)](#); [Borrego, Jeremy \(FTA\)](#)
Subject: FHWA and FTA Directives on public participation
Date: Wednesday, June 3, 2020 12:43:48 PM

Dear Ms. Harris and Mr. Borrego - I am interested to see if FHWA and/or FTA have guidance on how local jurisdictions should respond to public comments on transportation plans. I know for some NEPA documents, the decision-maker needs to address, in writing, each and all public comments, to show that they have been heard considered. Is there similar guidance or requirements from FHWA or FTA when jurisdictions are making plans for federally aided projects? Can you point me to any particular regulations or guidance? Thank you.

Kathy Lincoln
Keizer, OR.

From: [EVAN WHITE](#)
To: [Harris, Jasmine \(FHWA\)](#); [Borrego, Jeremy \(FTA\)](#)
Subject: Comments on Salem-Keizer Transportation Planning
Date: Saturday, May 16, 2020 6:16:26 PM

My understanding is that you have asked for comments about the transportation planning process in the Salem-Keizer area. I do not have access to a paper copy of the draft EIS, and so I will work from memory, and make just four points.

1) Alternative 4D with its flyover concrete ramps was a monstrosity, and it was not clear why that alternative was ever adopted. Nor was it clear why Salem City Council adopted a "son-of-4D" alternative --- for which traffic time improvements were never calculated.

2) When the traffic time savings were calculated, comparing "no build" to 4D, you have to question whether the time savings would be worth the massive public investment of \$500 to \$800 million or more.

3) It was a major mistake not to have discussed the cost and "who pays" up front with the public. I get it that people like road improvements for which someone else pays. As I recall much of the morning and peak usage of the bridges were caused by people who choose to live in West Salem and then commute to work on the other side of the river. It is ironic that the two principal drumbeaters for the "Salem Bridge Solutions" group are realtors whose office is just off the west side of one of the existing bridges, and who no doubt salivate at the thought of building more and more subdivisions in West Salem.

4) Another major mistake was to not have leveled with the public about the one possible way of financing another bridge -- congestion pricing. There is a great deal of literature on this, and I mentioned several times, in public testimony, as just one example among many, [Congestion Pricing A Primer: Overview](#) , Published by the U.S. Department of Transportation.

Salem Public Works Director Peter Fernandez, as I recall, once said that Oregon law does not allow tolling. If that is the case, then let us learn what the law is and how it might be changed. And then find out if the public is really willing to bear the cost.

Thank you for requesting public comment.

Evan White
4553 Brock Loop S.
Salem, OR 97302
epwhitehouse@comcast.net

file: bridge comments



Public Works Department

555 Liberty Street SE / Room 325 • Salem OR 97301-3513 • Phone 503-588-6211 • Fax 503-588-6025

June 9, 2020

Jasmine Marie Harris, Transportation Planner
Federal Highway Administration, Oregon Division
530 Center Street NE, Suite 420
Salem OR 97301

SUBJECT: SKATS Certification Review

Dear Ms. Harris:

I am writing to share input pertaining to the transportation planning process conducted by the Salem-Keizer Area Transportation Study (SKATS). SKATS works closely with City staff in developing and adopting the various transportation planning products required of them as the MPO for our area. City staff has a strong working relationship with our colleagues at SKATS.

In late 2018, we participated in the MPO Peer Review of the SKATS Congestion Management Process. Subsequently, we worked closely with SKATS staff in their update of the Congestion Management Process. In addition to myself, the City Traffic Engineer and one of the City Signal Engineers participated in several meetings to develop a process that will work best for our area.

I appreciate the work that SKATS does to support transportation planning in our region. Thank you for taking the time to consider this input.

Sincerely,

Julie Warncke
Transportation Planning Manager

JP:\fileshare2\PWGroup\director\Judy\2020 Corresp\SKATSTMA Certification June 2020.docx

RECEIVED
JUN 10 2020
FHWA
OREGON DIVISION

**Transportation and Utility
Operations**

1410 20th Street SE / Building 2
Salem OR 97302-1209
Phone 503-588-6063
Fax 503-588-6480

Parks Operations

1460 20th Street SE / Building 14
Salem OR 97302-1209
Phone 503-588-6336
Fax 503-588-6305

**Willow Lake Water Pollution
Control Facility**

5915 Windsor Island Road N
Keizer OR 97303-6179
Phone 503-588-6380
Fax 503-588-6387

◆ ADA Accommodations Will Be Provided Upon Request ◆
Servicios razonables de accesibilidad se facilitarán por petición

Appendix B – Agenda

2020 SKATS TMA Certification Review Agenda

Date of Meeting: June 17-18, 2020

Time: 9:00 AM

Location: Microsoft Teams

Participants:

SKATS - Mike Jaffe, Ray Jackson, Kimberley Sapunar and Karen Odenthal

ODOT - Erik Havig, Dan Fricke, Lisa Nell, Arla Miller, and Naomi Zwerdling

Cherriots - Steve Dickey, and Chris French

Federal Review Team:

FHWA - Jasmine Harris, Rachael Tupica, and Theresa Hutchins,

FTA - Ned Conroy and Jeremy Borrego

Wednesday, June 17, 2020	
Microsoft Teams All Day	
Topic	Time
Introductions	9:00 AM
Purpose of Review	9:03 AM
Scope and Methodology	9:06 AM
Review Schedule	9:10 AM
Metropolitan Transportation Plan (MTP) / PBPP <ul style="list-style-type: none">- Overview, SKATS Staff- Discussion, All	9:15 AM
Break at 10:30 AM	
Metropolitan Transportation Plan (MTP) / PBPP <ul style="list-style-type: none">- Discussion, All	11:00 AM
Lunch at 12:00 PM	
Draft Congestion Management Process (CMP) <ul style="list-style-type: none">- Overview, SKATS Staff- Discussion, All	1:00 PM
Break at 2:30 PM	
Wrap-up and Questions	3:00 PM
Adjourn	3:15 PM

Thursday, June 18, 2020	
Microsoft Teams All Day (except Policy Board Meeting)	
Topic	Time
Transportation Improvement Program (TIP) / PBPP <ul style="list-style-type: none">- Overview, SKATS Staff- Discussion, All	9:00 AM

Break at 10:30 AM	
SKATS Policy Committee (PC) Teleconference: Phone: 503-540-4421, 4-digit # 8121 <ul style="list-style-type: none"> - Introductions - Purpose of the Review - Scope and Methodology: RTP, CMP, TIP, PBPP and Consultation - Review Schedule - Q & A 	11:00 AM
Lunch at 12:00 PM	
Consultation Processes <ul style="list-style-type: none"> - Overview, SKATS Staff - Discussion, All 	1:00 PM
Break at 2:30 PM	
Wrap-up and Questions	3:00 PM
Adjourn	3:15 PM

Appendix C – 2016 Certification Findings

SKATS 2016 certification findings include:

- 5 Corrective actions
- 11 Recommendations
- 1 Commendation

SKATS 2016 Certification Findings
<p>Recommendation 1 – Certification Action Team: The Federal review team recommends SKATS staff, SKATS members, FHWA, FTA, ODOT, and SAMTD create a certification review action team which would be responsible for ensuring the successful resolution of corrective actions. Participants would be responsible for:</p> <ul style="list-style-type: none">• Creating an action plan for addressing corrective actions and recommendations (FHWA can provide a template)• Participate in periodic status update meetings• Provide/receive technical assistance• Review draft processes and documents prior to meetings• Setting other ground rules for the team
<p>Recommendation 2 –UPWP: The Federal review team recommends SKATS make the following improvements to the UPWP:</p> <ul style="list-style-type: none">• A summary table that details schedule of all work tasks, including key milestones, and scheduled completion dates for the UPWP.• Documentation of the regional transportation issues facing the metropolitan planning area, as identified in the 2015-2035 RTSP, and how the tasks funded in the UPWP address those issues.• A table that identifies the status of all Federally required MPO documents, including:<ul style="list-style-type: none">○ Current MPO adoption date,○ Federal approvals/determinations, when appropriate, and○ Scheduled timeframe/deadline for updates which may extend past the timeframe of the UPWP.
<p>Recommendation 3 – UPWP: The Federal review team recommends SKATS more consistently and sufficiently document for each UPWP work task:</p> <ul style="list-style-type: none">• Description of the work to be performed and who will perform the work, as leads or support.• The schedule for completion of the work tasks, including dates of key milestones.• The intended products for discrete work tasks.

SKATS 2016 Certification Findings
<ul style="list-style-type: none"> • Cost estimates provided for each work element, including the source of funding and funding program.
<p>Corrective Action 1 – Metropolitan Transportation Plan: By May 31, 2019, with the update of the MTP, SKATS must clearly document an integrated, regional transportation planning process, including all supporting analysis, to meet the requirements of 23 CFR 450.324. The MTP should include documentation on: the clear integration of Federal planning factors; the use of the plan’s vision, goals, objectives, and indicators in the decision-making process; and consultation processes. The plan should also include a more fully developed financial plan and further discussion of the linkage between the CMP and RTSP.</p>
<p>Corrective Action 2 – TIP: By July 1, 2020, with the update of the next TIP, SKATS must provide clear documentation that adequate funding is available by year to operate and maintain the system and to deliver projects on the schedule proposed in the TIP to meet all financial planning and fiscal constraint requirements identified in 23 CFR 450.326.</p>
<p>Recommendation 4 – TIP: The Federal review team recommends SKATS update TIP amendment procedures to clearly distinguish what constitutes full amendments which requires Federal approval, ensuring all changes that affect financial constraint are an amendment.</p>
<p>Recommendation 5 – TIP: The Federal review team recommends ODOT work with local road agencies to identify causes of project delays, identify solutions, and provide the oversight necessary to ensure project implementation schedules and cost estimates are realistic, projects are delivered on schedule, and the carry-forward culture is eliminated.</p>
<p>Recommendation 6 – TIP: The Federal review team recommends ODOT work with all Oregon MPOs to cooperatively create a consistent statewide TIP financial planning process and format to demonstrate financial constraint by year.</p>
<p>Commendation 1 – TIP: The Federal review team commends SKATS for implementing a TIP project prioritization process that addresses consistency with local transportation systems plans, regional MTP goals and objectives, and begins to address project readiness.</p>
<p>Corrective Action 3 – CMP: By May 31, 2019, with the update of the MTP, SKATS must make the following improvements to the congestion management process to meet the requirements of 23 CFR 450.322:</p> <ul style="list-style-type: none"> • Congestion management objectives, • Evaluation of alternative strategies, • Evaluation of the effectiveness of congestion reduction strategies with established performance measures, and • Evaluation of the efficiency and effectiveness of implemented actions.

SKATS 2016 Certification Findings

Recommendation 7 – CMP: The Federal review team recommends SKATS make the following improvements to the CMP:

- Documentation of the regional and corridor level congestion management processes and analyses.
- More fully develop the multimodal transportation system performance measures so that they include other modes besides transit and automobiles, and that they more fully integrate into the CMP-MTP process.
- Identification of non-recurring congestion and strategies to address, possibly using crash data.
- Identify any additional linkages to ITS technologies as related to the regional ITS Architecture.
- Further develop the identified transportation projects section for each corridor into an implementation activity list with a complementary schedule.
- Enhance the documentation of the feasibility and effectiveness of alternative strategies (i.e., TDM, operations, bike/pedestrian, etc.) selected for implementation in major corridors where significant capacity additions are planned or programmed.

Recommendation 8 – CMP: The federal review team recommends SKATS continue to utilize the ROCR to meet the CMP requirement for system evaluation and monitoring, and document how, when, and where the data and analysis in the ROCR applies to the congestion management process. The Federal review team also recommends SKATS identify reliable data collection and system performance monitoring methods to define the extent and duration of congestion and to help determine the causes of congestion.

Corrective Action 4 – Public Participation: By December 31, 2017, prior to the next MTP update, SKATS shall update the PPP to meet all requirements of 23 CFR 450.316 and 326(b), including:

- Identification of key decision points where the MPO requests public comment and explicit procedures for outreach at these milestones.
- Inclusion of a disposition of comments with major federal planning documents.
- Specific outreach strategies to engage traditionally underserved populations.
- Criteria or process to evaluate the effectiveness of outreach processes.
- In each major planning document, a demonstration of how the explicit processes and procedures identified in the PPP were followed and a summary that characterizes the extent to which public comments influenced MTP and TIP development.

Recommendation 9 – Public Participation Plan: The Federal review team recommends SKATS add instructions to the PPP on how the public can become one of the selected members to sit on the Citizens Advisory Committee if one is established.

Corrective Action 5 – Consultation: By December 31, 2017, SKATS shall develop and document a formal consultation process for the MPO to meet all requirements in 23 CFR 450.316(b-e), 23 CFR 450.324(g)(10), and in 23 CFR 450.324(h).

SKATS 2016 Certification Findings

Recommendation 10 – Environmental Justice: The Federal review team recommends SKATS improve Environmental Justice (EJ) analysis by:

- Collaborating with community groups and agencies that work with EJ populations, including local transit providers, to collect feedback on criteria and threshold for identifying EJ population locations, outreach strategies, and to begin building relationships with EJ populations.
- Providing separate maps of individual EJ minority populations and an aggregated EJ population map, to better demonstrate the make-up of the community, for use in better identifying which community groups and agencies to partner with, and identify specific outreach strategies beneficial to specific EJ populations.
- The MTP and TIP environmental justice analysis should be further developed to identify how projects and programs would benefit and/or burden environmental justice populations compared to non-EJ populations. SKATS should consider using the MTP goals, objectives, and indicators as criteria for this EJ benefits and burden analysis.
- Using the terminology “minority” populations.

Recommendation 11 – PBPP: The Federal review team recommends SKATS continue to work with ODOT and SAMTD to implement new planning requirements for performance-based planning and programming, including:

- Discussing the new requirements, identify which processes need updating to meet new requirements and a plan for updates, data collection and sharing requirements to be ready for PBPP.
- Making necessary connections to other performance-based plans.
- Further developing data needs to ensure that future MTP and TIP updates implement an objective-driven, performance-based planning process.
- Updating Planning Agreements that describes how transportation planning efforts will be coordinated between the agencies and document specific roles and responsibilities each agency has in the performance of transportation planning for the region.
- Reviewing MTP and TIP project prioritization and decision-making processes and how they support a performance-based process.
- Identifying a way to capture safety projects, or safety components on projects, in the MTP and TIP in a way that will assist the MPO in meeting the new performance-based planning and programming requirements.



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