



Transportation Planning Certification Review

Spokane Regional Transportation Council

Federal Highway
Administration,
Washington Division,
Olympia, Washington

&

Federal Transit
Administration
Region 10,
Seattle, Washington

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EXECUTIVE SUMMARY

Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) are required to review, evaluate, and certify—at least every four years—the transportation planning processes for each Transportation Management Area (TMA). This report focuses on the certification review conducted on the Spokane Regional Transportation Council (SRTC).

This certification review determines whether the Spokane Metropolitan Planning Organization (MPO) meets the Federal requirements of Section 23 of the Code of Federal Regulations, Part 450 (23 CFR 450), Subpart C and 49 CFR 613 - Metropolitan Transportation Planning and Programming. The review may also suggest opportunities to enhance the quality of the planning process and ensure that Federal projects can advance without delay.

In addition, as a TMA designated as a “maintenance” area for certain air pollutants, the certification review must evaluate SRTC’s planning processes to ensure it meets the U.S. Environmental Protection Agency’s (EPA’s) air quality conformity requirements contained in 40 CFR 51—Requirements for Preparation, Adoption, and Submittal of Implementation Plans.

The TMA certification review process used by FHWA and FTA includes three parts:

1. conduct a desk review of key documents and materials that demonstrate compliance with Federal planning laws and guidance;
2. conduct a site visit and lead discussions with TMA staff to clarify and understand how the MPO approaches its obligations under 23 U.S.C. and 49 U.S.C.; and,
3. transmit the TMA Certification Review Report.

This report documents the major findings and recommendations of the review. These certification reviews can result in “corrective actions,” “recommendations,” or “comments.” Corrective actions describe conditions that lead to a failure to meet Federal planning regulations and maintain USDOT certification, and provide tasks for the TMA to undertake to rectify these conditions. Recommendations should be addressed to enhance existing processes and more fully comply with Federal planning requirements. Comments are opportunities for FHWA and FTA to provide observations or commendations for the work accomplished.

On August 28, 2019, FHWA and FTA conducted a work session with SRTC staff, and on October 22, 2019, the Federal team held an on-site review that included discussions with MPO staff, Spokane Transit Authority, state and local government staff, and MPO policy board members. In lieu of a formal public meeting, a 30-day public comment period was available, requesting comments from the public on SRTC’s planning process. The public comment period was open October 15 through November 15, 2019. See Appendix B for more details on the certification review process.

The Federal TMA certification review of SRTC resulted in no corrective actions for the TMA certification review, but contains recommendations and commendations.

FHWA and FTA find SRTC to be compliant with all applicable Federal transportation planning requirements, and therefore, jointly certify the transportation planning process in the Spokane Transportation Management Area.

2020 SPOKANE REGIONAL TRANSPORTATION COUNCIL (SRTC)

TRANSPORTATION MANAGEMENT AREA (TMA) CERTIFICATION REVIEW

Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) review, evaluate, and certify—at least every four years—the transportation planning processes for each Transportation Management Area (TMA). This report focuses on the certification review conducted on the Spokane Regional Transportation Council (SRTC).

This certification review determines whether the Spokane Metropolitan Planning Organization (MPO) meets the Federal requirements of Section 23 of the Code of Federal Regulations, Part 450 (23 CFR 450), Subpart C and 49 CFR 613 - Metropolitan Transportation Planning and Programming. The review may also suggest opportunities to enhance the quality of the planning process and ensure that Federal projects can advance without delay.

The previous SRTC Certification Review, completed in January 2016, resulted in no corrective actions, but did include recommendations and commendations. Appendix A summarizes the resolutions to the recommendations in the 2016 Certification Review. The current 2020 SRTC Certification Review also did not identify any corrective actions. The review did identify seven recommendations and four commendations. The table below provides a summary of the review.

SUMMARY OF 2020 SRTC TMA CERTIFICATION REVIEW

Topic #	Topic Area	Recommendations and Comments
1	Metropolitan Planning Area Boundaries	None
2	Transportation Planning Process	None
3	Unified Planning Work Program	The Federal Team recommends that SRTC provide citations, dates, or links to cross-reference documents in the UPWPs to reflect timelines, milestones, and deliverables, indicating the start and completion of projects or goals being met as applicable, rather than listing these efforts and associated expenditures of Federal dollars only as “ongoing” or “in process.”
4	Performance-Based Planning and Programming/Transportation	The Federal Team commends SRTC for its proactive approach to transportation performance management.

Topic #	Topic Area	Recommendations and Comments
	Performance Management	The Federal Team recommends that, as part of the next Horizon 2040 update, SRTC establish and reference regional targets for all respective performance measures, and include a narrative that describes how transportation investments and strategies in the MTP will support achievement of the regional performance targets.
5	Metropolitan Transportation Plan Development	<p>The Federal Team recommends that, as part of the next Horizon 2040 update, SRTC include an analysis for how transportation investments in the MTP will result in benefits and/or burdens to environmental justice populations.</p> <p>The Federal Team recommends that, as part of the update of Horizon 2040, the financial plan make clear where additional funding -- sources and amounts -- will come from, to support long-term operations, maintenance, and preservation of transportation investments. The financial plan should also clearly distinguish between current revenue sources of funds and new revenue sources that are assumed to support identified investments in the MTP.</p> <p>The Federal Team recommends that, as part of the update of Horizon 2040, SRTC include additional information on non-urban transit providers and unmet needs for public transit services connecting urban and rural areas as identified in the coordinated Human Service Public Transit Plan (HSTP) (adopted November 2018).</p>
6	Congestion Management Process and Data Management	None
7	Air Quality Conformity	None
8	Transportation Improvement Program (TIP)	None
9	Public Participation and Outreach	The Federal Team commends SRTC for a robust series of approaches in public participation and outreach, including addressing barriers in working with LEP, EJ, Title VI, and ADA populations, and for documenting these processes well.

Topic #	Topic Area	Recommendations and Comments
		<p>The Federal Team recommends that SRTC document and evaluate all interactions with tribal governments as part of the effort to grow and continue to improve their tribal consultation program.</p>
10	Title VI, Environmental Justice, and Related Requirements	<p>The Federal Team commends the SRTC Policy Board for its leadership in making improvements in the areas of Title VI, Environmental Justice, ADA, and related areas.</p> <p>The Federal Team recommends adding more Spanish options on the main SRTC web site to better reach the Spanish-speaking population.</p> <p>The Federal Team commends SRTC for making more significant efforts to reach out to its population of persons with disabilities, and in turn making efforts to determine how best to serve that population.</p>
11	MPO Self-Certification	None

SRTC PLANNING CERTIFICATION REVIEW TOPIC AREAS

1. Metropolitan Planning Area Boundaries

Regulatory Basis

The metropolitan planning area boundary (MPA) refers to the geographic area in which the metropolitan transportation planning process must be carried out. The MPA shall, at a minimum, cover the Census-defined, urbanized area (UZA) and the contiguous geographic area likely to become urbanized within the 20-year forecast period covered by the Metropolitan Transportation Plan. Adjustments to the UZA because of the transportation planning process are typically referred to by FHWA as the urbanized area boundary (UAB). In accordance with 23 U.S.C. 134 (e), the boundary should foster an effective planning process that ensures connectivity between modes and promotes overall efficiency. The MPA boundary should include U.S. Environmental Protection Agency (EPA)-defined air quality nonattainment and/or maintenance areas, if applicable, in accordance with the National Ambient Air Quality Standards (NAAQS) for ozone or carbon monoxide.

Findings

SRTC will incorporate demographic data from the 2020 U.S. Census using Study Map and other GIS tools after the next MTP update, which is due in 2021.

The Data Applications for Transportation Analysis (D.A.T.A.) project beginning in early 2020, will inform GIS applications and more clearly illustrate demographic data to be used in project prioritization decisions.

SRTC has created new maps and included additional demographic data that is available in the revised Public Participation Plan.

Corrective Actions

None

Recommendations and Comments

None

2. Transportation Planning Process

Regulatory Basis

In urbanized areas with a population of 50,000 or more, Federal planning law (23 U.S.C. 134 and 49 U.S.C. 5303 and 23 CFR 450) calls upon local officials to cooperate with states and public transportation providers in undertaking a continuing, comprehensive, and cooperative (3C) multi-modal transportation planning process.

In metropolitan areas, Federal planning law (23 U.S.C 134 and 49 U.S.C. 5304) requires each MPO to cooperate with the state and local officials, to develop a long-range metropolitan transportation plan, transportation improvement program, and unified planning work program (UPWP). These planning and programming documents are developed through a 3C process carried out on a statewide basis, but coordinated with the metropolitan planning processes of the MPO. Funding is available from FHWA and FTA to support metropolitan transportation planning. Planning programs are jointly administered by FHWA and FTA.

Findings

SRTC completes required transportation planning activities, and ensures that all member jurisdictions are included in planning and project level decisions made by the SRTC policy board.

SRTC has established a strong leadership role and developed effective partnerships with member agencies. Its organizational structure supports a positive framework for conducting a continuing, comprehensive, and cooperative (3C) planning process.

The SRTC Policy Board supports strategic leadership for enhancing the role of the MPO using the Management Review Committee and Technical Advisory Committee to guide the direction of the MPO.

SRTC has made significant enhancements to its data management system by developing and maintaining appropriate data sets used in its regional GIS mapping system.

The collaborative planning activities completed by SRTC and explained in the UPWP contributes to the successful execution of the 3C planning process.

Corrective Actions

None

Recommendations and Comments

None

3. Unified Planning Work Program

Regulatory Basis

MPOs are required to develop Unified Planning Work Programs (UPWPs) in Transportation Management Areas (TMAs) to govern work programs for the expenditure of FHWA and FTA planning and research funds (23 CFR 450.308). The UPWP must be developed in cooperation with the State and public transit agencies and include the required elements, such as a discussion of planning priorities, work proposed for the next 1- or 2-year period by major activity and tasks in sufficient detail to indicate who will perform the work, the schedule for completing the work, the resulting products, the proposed funding by activity/task, and a summary of the total amounts and sources of Federal and matching funds.

Findings

SRTC staff prepares for their annual UPWP review, providing finance and project data and updates as appropriate, and engaging USDOT in conversations about plans. FHWA/FTA and SRTC use the UPWP meetings to discuss TMA certification-related topics, as well as other updates.

SRTC identifies Title VI, Environmental Justice (EJ), Section 504 and the Americans with Disabilities Act planning priorities and activities as part of its annual UPWP.

Documents prepared by SRTC are sometimes lacking in clear documentation, such as technical citations, dates for activities, meetings, past or planned deliverables or updates, etc.

Corrective Actions

None

Recommendations and Comments

The Federal Team recommends that SRTC provide citations, dates, or links to cross-reference documents in the UPWPs to reflect timelines, milestones, and deliverables, indicating the start and completion of projects or goals being met as applicable, rather than listing these efforts and associated expenditures of Federal dollars only as “ongoing” or “in process.”

4. Performance-Based Planning Process

Regulatory Basis

States and Metropolitan Planning Organizations (MPOs) are required to take a performance-based approach to planning and programming. 23 USC 150 Performance-based planning and programming regulations establish requirements for metropolitan planning organizations to coordinate with the State DOT to set performance targets, and integrate those performance targets and performance plans into their planning documents by certain dates, per 23 CFR § 450.306. MPOs are also required to reference performance targets and performance based plans into their TIPs and Metropolitan Transportation Plans, per 23 CFR § 450.324 and 23 CFR § 450.326. The planning products must include a description of the performance measures and performance targets used in assessing the performance of the transportation system and should include, to the maximum extent practicable, a description of the anticipated effect toward achieving the performance targets identified in the metropolitan transportation plan and TIP, linking investment priorities to performance targets.

MPOs must initiate discussions with transit agencies, state DOTs and planning partners to update Metropolitan Planning Agreements, per 23 CFR § 450.314. This presents an opportunity for MPOs and planning partners to clarify roles and responsibilities for developing and sharing performance data, setting performance targets, reporting of targets, and tracking progress towards meeting targets, through a formal agreement.

Findings

SRTC has engaged its member jurisdictions and policy board effectively, and worked closely with the state to ensure that active collaboration and coordination related to performance measures occur.

Horizon 2040 includes references to Federal performance-based planning requirements and outlines regional targets established at the time of plan adoption. Deadlines for regional targets for transit asset management (June 2017) and transit safety (January 2021) have since been established.

WSDOT uses a tiered approach in collaborating with MPOs – a framework group, working group, and technical teams (for each performance measure). This information is also available on the WSDOT performance measures website. SRTC is an active participant in these meetings, and often pushes the state to deliver on deadlines and consider MPO challenges when going through the target-setting process for each performance measure.

Corrective Actions

None

Recommendations and Comments

The Federal Team commends SRTC for its proactive approach to transportation performance management.

The Federal Team recommends that, as part of the next Horizon 2040 update, SRTC establish and reference regional targets for all respective performance measures, and include a narrative that describes how transportation investments and strategies in the MTP will support achievement of the regional performance targets.

5. Metropolitan Transportation Plan (MTP) Development

Regulatory Basis

In accordance with 23 CFR 450.322 (a) “The metropolitan transportation planning process shall include the development of a transportation plan addressing no less than a 20-year planning horizon...the transportation plan shall include both long-range and short-range strategies/actions that lead to the development of a multi-modal transportation system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.”

Findings

Online documents such as the MTP, while generally thorough, lacked some citations, links to support material, important dates (e.g., using “recently” instead of the date of a previous update), potentially jeopardizing the ability to explain, track, or defend decisions made in these documents.

Horizon 2040 (adopted December 2017) includes references to barriers to low-income, minority and transportation disadvantaged populations and discusses SRTC Title VI plan/ ADA policy. The ability to better analyze how transportation investments will result in benefits and/or burdens to environmental justice populations is anticipated to be one of many uses of the D.A.T.A. project scheduled to begin in early 2020.

The coordinated Human Service Public Transit Plan (HSTP), adopted November 2018, includes useful information on non-urban transit providers and identifies numerous unmet needs for public transit services connecting urban and rural areas.

The Horizon 2040 (2017 edition) stated that there is a lack of adequate funding for operations, maintenance, and preservation. Specifically, the plan states that existing funding levels are inadequate and references the need for “additional local options that will be required” for roadway maintenance and that “some public transit providers are unable to fund needed services”. The financial plan does not clearly identify the new revenue sources that are needed to support these potential unmet needs.

Horizon 2040 includes demographics of typically underserved populations, such as minority populations, persons at or below the poverty level, elderly persons with disabilities, zero-car households, and persons with limited English proficiency.

Corrective Actions

None

Recommendations and Comments

The Federal Team recommends that, as part of the next Horizon 2040 update, SRTC include an analysis for how transportation investments in the MTP will result in benefits and/or burdens to environmental justice populations.

The Federal Team recommends that, as part of the update of Horizon 2040, the financial plan make clear where additional funding -- sources and amounts -- will come from, to support long-term operations, maintenance, and preservation of transportation investments. The financial plan should also clearly distinguish between current revenue sources of funds and new revenue sources that are assumed to support identified investments in the MTP.

The Federal Team recommends that, as part of the update of Horizon 2040, SRTC include additional information on non-urban transit providers and unmet needs for public transit services connecting urban and rural areas as identified in the coordinated Human Service Public Transit Plan (HSTP) (adopted November 2018).

6. Congestion Management Process (CMP) and Data Management

Regulatory Basis

A congestion management process (CMP) applies to transportation management areas (TMAs) and is a systematic approach for managing congestion through a process that “provides for safe and effective integrated management and operation of the multimodal transportation system, based on a cooperatively developed and implemented metropolitan-wide strategy, of new and existing transportation facilities eligible for funding under title 23 U.S.C., and title 49 U.S.C. Chapter 53 through the use of travel demand reduction and operational management strategies.” (23 CFR 450.320(a))

Findings

The Data Applications for Transportation Analysis (D.A.T.A.) project, a \$1.2 million project that SRTC is beginning in early 2020, is anticipated to aid in collecting and using data more efficiently toward products such as the TIP, MTP, CMP, project prioritize and selection.

SRTC has developed a CMP appropriate to the needs of the region, including the development of the CMP Toolkit, CMP/TIP Compliance Process, Roadway Capacity Justification Report, and CMP Journal that provides for innovative and effective implementation of the CMP.

Corrective Actions

None

Recommendations and Comments

None

7. Air Quality Conformity

Regulatory Basis

For MPOs classified by EPA as areas of air quality nonattainment or maintenance, special requirements apply to the metropolitan planning process. Section 176 (c)(1) of the Clean Air Act Amendments of 1990 (CAAA) states: “No metropolitan planning organization designated under Section 134 of title 23, United States Code, shall give its approval to any project, program, or plan which does not conform to an implementation plan approved or promulgated under section 110.” The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) includes provisions in response to the CAAA mandates.

Section 176(c)(1) of the Clean Air Act (CAA) Amendments of 1990 states: “*No metropolitan planning organization designated under section 134 of title 23, United States Code, shall give its approval to any project, program, or plan which does not conform to an implementation plan approved or promulgated under section 110.*” Provisions governing air-quality-related transportation planning are incorporated in several metropolitan planning regulations, including: 23 CFR 450.314, 23 CFR 450.322, 23 CFR 450.320, 23 CFR 450.324, 23 CFR 450.326, and 23 CFR 450.334.

Findings

SRTC complies with air quality conformity requirements, and participates fully in the air quality conformity analysis and review each year, in keeping with its status as a “maintenance” area for carbon monoxide (CO) and particulate matter of 10 micrometers in diameter or less (PM10).

SRTC’s Air Quality Interagency Consultation MOU is reviewed regularly by SRTC and WA Department of Ecology to ensure that current interagency relationships are reflected.

Corrective Actions

None

Recommendations and Comments

None

8. Transportation Improvement Program

Regulatory Basis

23 CFR 450.324 requires the MPO to develop a Transportation Improvement Program (TIP) in cooperation with state and public transit operators. Specific requirements and conditions, as specified in the regulations, include, but are not limited to:

- An updated TIP, covering a period of at least four years, that is compatible with the State Transportation Improvement Program (STIP) development and approval process [23 CFR 450.324 (a)];
- The TIP should identify all eligible Transportation Control Measures (TCMs) included in the State Implementation Plan (SIP), and give priority to eligible TCM's and projects included for the first two years which have funds available and committed; [23 CFR 450.324 (i)];
- The TIP should include capital and non-capital surface transportation projects, bicycle and pedestrian facilities and other transportation enhancements; Federal Lands Highway projects; and safety projects included in the State's Strategic Highway Safety Plan. The TIP and STIP must include all regionally significant projects for which an FHWA or the FTA approval is required whether the projects are to be funded with Title 23 or Title 49 funds. In addition, all Federally and non-Federally funded, regionally significant projects must be included in the TIP and STIP and consistent with the Metropolitan Transportation Plan (MTP) for information purposes and air quality analysis in nonattainment and maintenance areas; [23 CFR 450.324 (c)(d)]

Findings

SRTC programs projects in accordance with transportation performance management.

SRTC demonstrates that the TIP projects are fully funded by phases, and meets fiscal constraint requirements in programming projects that have funds that are reasonably expected to be available.

SRTC has developed clear guidance for MPO member agencies and other stakeholders through the development of the Horizon 2040 MTP Toolkit and the TIP Guidebook.

SRTC includes a notice of its Section 504/ADA nondiscrimination commitment (i.e., ADA Nondiscrimination Statement) and the Title VI Nondiscrimination Statement in the TIP document.

Corrective Actions

None

Recommendations and Comments

None

9. Public Participation

Regulatory Basis

The MPO is required, under 23 CFR 450.316, to engage in a metropolitan planning process that creates opportunities for public involvement, participation and consultation throughout the development of the MTP and the TIP and is also included in 23 CFR 450.322 (f) (7) and (g) (1) (2), (i) and 23 CFR 450.324 (b). The MPO is also required to ensure that its public participation process is inclusive and nondiscriminatory under Title VI (49 CFR 20.5), Section 504 (49 CFR 27.7) and the ADA (28 CFR 35.130).

Findings

SRTC has added substantially to its tools to expand its outreach to marginalized populations, captured in SRTC's 2018 Title VI Plan (which also compiles approaches to work with its ADA, LEP, and other communities).

The broader outreach for public participation is captured well in the Public Participation Plan (PPP) adopted December 2017. The PPP identifies outreach barriers, as well as a clear reference to the sections that describe how SRTC addresses these barriers. SRTC outlines its PPP principles and the procedures it uses to implement these principles. See resources in Appendix C.

SRTC demonstrates outreach to all populations, conducts multi-stage analyses to determine results of outreach, assures enhanced public participation, and has developed and evaluated the use of various outreach efforts.

SRTC determines appropriate meeting locations according to accessibility, EJ, Title VI and ADA requirements, and offer translation services.

SRTC provides a link on its website in other languages (as appropriate) that directs individuals to contact SRTC staff to request translation of meetings/materials, to more effectively reach persons who are limited in English proficiency.

SRTC has enhanced their efforts to fully implement the public outreach efforts identified in the PPP. SRTC has established personal contacts with organizations serving the needs of the traditionally underserved populations, translating brochures/flyers and posting at locations where LEP populations reside, and evaluating the effectiveness of outreach efforts and modifying as needed.

Corrective Actions

None

Recommendations and Comments

The Federal Team commends SRTC for a robust series of approaches in public participation and outreach, including addressing barriers in working with LEP, EJ, Title VI, and ADA populations, and for documenting these processes well.

The Federal Team recommends that SRTC document and evaluate all interactions with tribal governments as part of the effort to grow and continue to improve their tribal consultation program.

10. Title VI, Environmental Justice, and Related Requirements

Regulatory Basis

USDOT ensures nondiscrimination under Title VI of the Civil Rights Act of 1964 (and other non-discrimination statutes). Title VI states “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” Title VI bars intentional discrimination as well as disparate-impact discrimination (that stemming from neutral policy or practice that has the effect of a disparate impact on protected groups).

Planning regulations [23 CFR 450.334(a)(3)] require FHWA and FTA to certify that “the planning process . . . is being conducted in accordance with all applicable requirements of . . . Title VI of the Civil Rights Act of 1964 and the Title VI assurance executed by each State under 23 U.S.C. 324 and 29 U.S.C. 794.” The Title VI assurance adds sex (gender) and disability to characteristics protected against discrimination.

The Limited English Proficiency (LEP) Executive Order 13166 ensures that, consistent with Title VI, persons with LEP have meaningful access to Federally conducted and funded programs and activities. The Order requires all agencies that provide Federal financial assistance to issue guidance on how Title VI applies to recipients of that assistance in their contact with persons who have LEP.

Title VI Executive Order 12898 (1994), provides that “each Federal agency shall make achieving Environmental Justice part of its mission by identifying and addressing, as appropriate, disproportionately high or adverse human health and environmental effects of its programs, policies, and activities on minority populations and low-income population . . .”. In compliance with this Executive Order, the USDOT Order on Environmental Justice was issued in 1997. Planning regulations (23 CFR 450.316(a)(1)(vii)) require that the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households that may face challenges accessing employment and other services, be sought out and considered.

Findings

SRTC provided examples of past, current, and planned changes to more fully meet the requirements of regulations related to LEP, EJ, Title VI, ADA populations. Title VI is posted in SRTC documents, and SRTC has put into action new LEP outreach efforts, including reaching new communities. SRTC is working with its local agencies on continued ADA compliance requirements.

SRTC has developed clear documentation for stakeholders to understand its approach to engage and provide opportunities for public input.

SRTC has provided limited Spanish instruction to users of its web pages concerning how to obtain information (and therefore more knowledge about the planning process) in Spanish. The Hispanic population currently must dial the main number and ask for a Spanish-speaking person.

SRTC's approach to comply with Section 504 of the Rehabilitation Act and the Americans with Disabilities Act includes funding several locally submitted ADA accessibility projects.

Appendices A and E of USDOT's Title VI Assurances have been incorporated in all agreements and contracts developed by SRTC.

SRTC considers the condition of the region's pedestrian access routes in conjunction with the mobility needs of persons with disabilities as part of Horizon 2040, and is documented in a Pedestrian Inventory.

SRTC reviews its planning processes and activities periodically (MTP, TIP, public participation, etc.) to ensure that they address Title VI effectively (and other nondiscrimination requirements).

Corrective Actions

None

Recommendations and Comments

The Federal Team commends the SRTC Policy Board for its leadership in making improvements in the areas of Title VI, Environmental Justice, ADA, and related areas.

The Federal Team recommends adding more Spanish options on the main SRTC web site to better reach the Spanish-speaking population.

The Federal Team commends SRTC for making more significant efforts to reach out to its population of persons with disabilities, and in turn making efforts to determine how best to serve that population.

11. MPO Self-Certification

Regulatory Basis

Self-certification of the metropolitan planning process, at least once every four years, is required under 23 CFR 450.334. The State and the MPO shall certify to FHWA and FTA that the planning process is addressing the major issues facing the area and is conducted in accordance with all applicable requirements of 23 CFR 450.300 and:

- 23 U.S.C. 134 and 49 U.S.C. 5303 and Sections 174 and 176(c) and (d) of the Clean Air Act (if applicable)
- Title VI of the Civil Rights Act of 1964 and the Title VI assurance executed by each State
- 49 U.S.C. 5332, prohibiting discrimination based on race, color, creed, national origin, sex, or age in employment or business opportunity

- Section 1101(b) of SAFETEA-LU and 49 CFR Part 26, regarding involvement of DBE in U.S. DOT-funded planning projects
- 23 CFR Part 230, regarding the implementation of an equal employment opportunity program on Federal and Federal-aid highway construction contracts
- ADA and U.S. DOT regulations governing transportation for people with disabilities [49 CFR Parts 27, 37, and 38]
- Older Americans Act as amended, prohibiting discrimination based on age
- 23 USC 324, regarding the prohibition of discrimination based on gender
- Section 504 of the Rehabilitation Act of 1973 and 49 CFR 27, regarding discrimination against individuals with disabilities
- All other applicable provisions of Federal law (e.g., while no longer specifically noted in a self-certification, prohibition of use of Federal funds for “lobbying” still applies and should be covered in all grant agreement documents (see 23 CFR 630.112).
- A certification review by FTA and FHWA of the planning process in TMAs is required at least once every four years, in addition to the required annual self-certification by the MPO and State.

Findings

SRTC adequately certifies that all Federal regulations and requirements are being followed with the annual submittal of the four-year TIP. SRTC submits the self-certification on schedule each year.

SRTC adheres to Federal regulations and requirements to develop the TIP, and is on schedule with this required self-certification of the transportation planning process.

Corrective Actions

None

Recommendations and Comments

None

Appendix A

SUMMARY OF RESOLUTIONS TO 2016 SRTC TMA CERTIFICATION REVIEW

Topic Area	Recommendations / Comments	Resolution
Organizational Structure of Study Area	FHWA and FTA recognize that SRTC has established a strong leadership role and developed effective partnerships with member agencies. Its or-	No resolution required.

Topic Area	Recommendations / Comments	Resolution
	ganizational structure supports a positive framework for conducting a continuing, comprehensive, and cooperative (3C) planning process.	
	FHWA and FTA recognize the Policy Board for its strategic leadership and for enhancing the role of the MPO using the Management Review Committee and Technical Advisory Committee to guide the direction of the MPO.	No resolution required.
	FHWA and FTA recognize that SRTC has enhanced their leadership structure by establishing Board member training related to the decision making necessary for regional transportation planning.	No resolution required.
Agreements and Contracts	The MOA among SRTC, WSDOT and STA is recognized as the pilot for an update of all MPO MOAs in the State of Washington. FHWA and FTA recognizes SRTC's leadership role in this process.	No resolution required.
	Appendix A and E of USDOT's Title VI Assurances should be incorporated verbatim in all agreements/contracts developed by SRTC.	SRTC has incorporated this language.
Unified Planning Work Program	FHWA and FTA recommend that SRTC specifically identify major Title VI, Environmental Justice (EJ), Section 504 and the Americans with Disabilities Act planning priorities and activities as part of its annual UPWP.	SRTC has added the necessary language to documents, with numerous initiatives in place and more in process to address these issues.
Transportation Planning Process	FHWA and FTA recognize SRTC for developing clear guidance to MPO member agencies and other stakeholders through the development of the Horizon 2040 MTP Toolkit and the Transportation Improvement Program (TIP) Guidebook.	No resolution required.
Metropolitan Transportation Plan Development	Consistent with Title VI requirements, SRTC must include a notice of its Title VI and Americans with Disabilities	SRTC incorporates the use of the required language for Title VI and ADA nondiscrimination in their documents.

Topic Area	Recommendations / Comments	Resolution
	Act (ADA) nondiscrimination commitment in the Horizon 2040 document.	
	FHWA and FTA recommend that the next update to Horizon 2040 should include more detailed demographics of typically underserved populations, such as minority populations, persons at or below the poverty level, elderly persons with disabilities, zero-car households, and persons with limited English proficiency.	SRTC has developed detailed demographic data GIS and tabular formats. They will update Horizon 2040 in 2020.
	FHWA and FTA recommend that the next update to Horizon 2040 include an Environmental Justice analysis that clearly identifies the benefits and burdens on EJ populations because of plan implementation.	This information has been provided in the Horizon 2040 update. SRTC has mapped this information; it's provided on the SRTC web page.
	FHWA and FTA recommend that SRTC more specifically consider the condition of the region's pedestrian access routes in conjunction with the mobility needs of persons with disabilities when updating Horizon 2040.	The Pedestrian Inventory includes the data collection toward this effort.
	FHWA and FTA recognize that SRTC has made significant enhancements to its data management system by developing and maintaining appropriate data sets used in its regional GIS mapping system.	No resolution required.
Air Quality	FHWA and FTA recommend that an update of SRTC's Air Quality Inter-agency Consultation MOU be considered to better reflect current inter-agency relationships, as well as the Federal emphasis on streamlining environmental processes.	SRTC conferred with WA Department of Ecology; they agreed the MOU is appropriate as is.
TIP and Project Selection	FHWA and FTA recommend that SRTC include a notice of its Section 504/ADA nondiscrimination commitment (i.e., ADA Nondiscrimination Statement) on the same page as the Title VI Nondiscrimination Statement.	This effort has been completed.

Topic Area	Recommendations / Comments	Resolution
	<p>FHWA and FTA recommend that the next TIP include an analysis of Environmental Justice populations that documents how these populations are considered in project selection and the relative impact of planned TIP projects and programs.</p> <p>FHWA and FTA recommend that SRTC enhance its outreach efforts to persons who are limited in English proficiency (LEP) by providing a link on the SRTC website that directs individuals to contact SRTC staff to request translation.</p> <p>FHWA and FTA recommend that the TIP Program Summary for pedestrian projects clearly identify the projects that specifically address ADA accessibility.</p>	<p>SRTC demonstrates outreach to populations, including tribes, conducts multi-stage analyses to determine results of outreach, assures enhanced public participation, and has developed and evaluated the use of ArcGIS-based maps to understand locations of populations in terms of ethnic minority, national origin, LEP, economic levels, older and younger populations, including disability and veterans where available.</p> <p>SRTC determines appropriate meeting locations according to accessibility, EJ, Title VI and ADA requirements, and offer translation services</p>
Public Participation	FHWA and FTA recognize the substantial effort by SRTC to update its Public Participation Plan (PPP) in 2013.	No resolution required.
	FHWA and FTA recommend that SRTC provide a link on its website in other languages (as appropriate) that directs individuals to contact SRTC staff to request translation of meetings/materials, to more effectively reach persons who are limited in English proficiency.	The last page of this 2020 TMA Certification Review report offers a list of examples where SRTC's outreach includes those of limited English proficiency among others.
	FHWA and FTA recommend that SRTC enhance their efforts to fully implement the public outreach efforts identified in the PPP. Specifically, more personal contacts with organizations serving the needs of the traditionally underserved populations, translating brochures/flyers and posting at locations where LEP populations reside, and evaluating the effectiveness of outreach efforts and modifying as needed.	SRTC has enhanced its public outreach efforts over the last four years.

Topic Area	Recommendations / Comments	Resolution
	FHWA and FTA recommend that SRTC can confirm, through documentation, that its method of communication is effective and reaches traditionally underserved populations.	SRTC engage, document, and reflect needs of traditionally underserved populations.
Self-Certification	FHWA and FTA recognize SRTC innovative approach to comply with Section 504 of the Rehabilitation Act and the Americans with Disabilities Act, by funding several locally submitted ADA accessibility projects.	No resolution required.
	FHWA recommends SRTC work with its local jurisdictions to identify/inventory accessibility barriers associated with the Region’s pedestrian access routes, and develop strategies/projects to address those features found to be inaccessible.	SRTC (and with its partner STA and others) has put into place efforts to develop strategies and gauge the value and focus of projects toward the goal of removing accessibility barriers.
Title VI and Related Requirements	SRTC should work with WSDOT to develop a firm schedule for submitting the Title VI Annual Report.	SRTC provides an annual Title VI report to WSDOT.
	FHWA and FTA recommend that SRTC periodically review all its planning processes/activities (MTP, TIP, public participation, etc.) to ensure that they effectively address Title VI (and other nondiscrimination requirements).	SRTC provides update, information and presentations on its current planning processes and activities (MTP, TIP, public participation, etc.) annually during annual UPWP reviews, and will continue to do so.
Congestion Management Process	FHWA and FTA recognize SRTC’s efforts toward developing a well-designed CMP appropriate to the needs of the region, including SRTC’s development of the CMP Toolkit, CMP/Transportation Improvement Program (TIP) Compliance Process, Roadway Capacity Justification Report, and CMP Journal that provides for innovative and effective implementation of the CMP.	No resolution required.
	FHWA and FTA recommend that SRTC continue to expand their performance monitoring efforts beyond congestion management so that they will	Horizon 2040 addresses initial performance-based planning requirements; the TIP is developed following a performance-measures-based approach.

Topic Area	Recommendations / Comments	Resolution
	be in a good position to address Federal requirements on performance-based planning.	

Appendix B

SRTC 2020 TMA Certification Review Timeline

August 28, 2019: Pre-TMA Certification Review Work Session

October 22, 2019: TMA Certification Review Meeting

Both meetings held at:

Spokane Regional Transportation Council Office
421 West Riverside Ave., Suite 500, Spokane, WA

Both meetings had phone-in capability available.

October 22, 2019 Meeting Attendee List:

Ned Conroy, Federal Transit Administration (FTA)
Sharleen Bakeman, Federal Highway Administration (FHWA)
Matt Kunic, Federal Highway Administration (FHWA)
Sabrina Minshall, Spokane Regional Transportation Council (SRTC)
Charlene Kay, Washington State Department of Transportation (WSDOT) Eastern Region
Anna Ragaza-Bourassa, WSDOT Eastern Region
Susan Meyer, Spokane Transit Agency (STA)
Mike Tresidder, Spokane Transit Agency (STA)
Mayor Steve Peterson, Liberty Lake, WA
Gordon Howell, Spokane Transit Agency (STA)
Karl Otterstrom, Spokane Transit Agency (STA)
Gabriel Phillips, WSDOT Headquarters
Patrick Pittenger, Benton-Franklin Council of Governments (BFCG) - *Observer*

In lieu of holding a formal public meeting, SRTC placed the following notice on its web page on behalf of USDOT.

(Posted October 15-November 15, 2019)

The Department of Transportation (USDOT) is required by Federal law to review and evaluate the transportation planning processes of Transportation Management Areas (TMAs) every four years. Spokane Regional Transportation Council (SRTC) is the Federally designated Metropolitan Planning Organization for the Spokane area, and is also designated as a TMA.

USDOT is soliciting public feedback on SRTC's work in transportation. Examples may include the areas below or any area of specific interest to you: Working with SRTC's member agencies / Transportation Data / Transportation Planning / Travel forecasting / Traffic Management / Transportation improvement programs / Pedestrian, bicycle and transit.

More information about SRTC's work is available on SRTC's web pages in the headings at the top of this page. The public comment period is open from October 15 to November 15.

Comments may be submitted by any of the following methods:

Email: contact.srtc@srtc.org

Phone: (509)343-6370

Mail: SRTC, 421 W. Riverside Ave., Suite 500, Spokane, WA 99201

Comments can also be sent to:

*Sharleen Bakeman
FHWA Washington Division
711 Capitol Way South, Suite 501
Olympia, WA 98501
Or email to: Sharleen.Bakeman@dot.gov*

*Ned Conroy
Region 10 Office
Federal Transit Administration
915 Second Avenue, Suite 3142
Seattle, WA 98174-1002
Or email to: Ned.Conroy@dot.gov*

(The page, under the “News” header, also links to “Title VI, Environmental Justice, ADA and Accessibility” and “Snow Removal Information” pages.)

No comments were received from the public regarding this review.

Appendix C

Public Participation and Outreach Resources

Below are examples provided by SRTC that illustrated their outreach in the context of ADA, Title VI, environmental justice, minority and low-income populations, etc. Links to these examples are provided below.

- 2018 Call for Projects application -- <https://www.srtc.org/wp-content/uploads/2019/08/2018-SRTC-Call-for-Projects-Application-4-17-18.pdf>
- Notice is on page viii of the 2020-2023 Transportation Improvement Program document - - <https://www.srtc.org/wp-content/uploads/2019/10/Final-2020-2023-TIP-Document.pdf>
- There is a paragraph on the front page of every Board packet. Example: November packet. -- <https://www.srtc.org/wp-content/uploads/2019/11/11-20-2019-TTC-Packet-Copy.pdf>
- There is a paragraph on every TTC agenda. Example: November TTC packet. -- <https://www.srtc.org/wp-content/uploads/2019/11/11-20-2019-TTC-Packet-Copy.pdf>
- Title VI notice on page 2 of the Unified Planning Work Program -- <https://www.srtc.org/wp-content/uploads/2019/06/FY-2020-UPWP-FINAL.pdf>
- Horizon 2040 has a Title VI Statement – <https://www.srtc.org/horizon-2040/>
- The Coordinated Public Transit-Human Services Transportation Plan has a Title VI Statement on page 2 -- https://www.srtc.org/wp-content/uploads/2018/11/Final-2018-CPT-HSTP_Board-Approved_110818.pdf
- Title VI information is on page 5 of the Public Participation Plan -- <https://www.srtc.org/wp-content/uploads/2019/08/PPP-11-7-17-FINAL.pdf>
- Title VI, Environmental Justice, and ADA page: <https://www.srtc.org/about-srtc/title-vi-ej-ada/>
- Press Release – <https://www.srtc.org/wp-content/uploads/2019/11/2019-TIP-Amendment-Apr.pdf>
- Legal Notice -- <https://www.srtc.org/wp-content/uploads/2019/11/2019-2022-TIP-Mar-Amendment.pdf>
- Sign-in Sheet -- <https://www.srtc.org/wp-content/uploads/2019/11/2019-2022-TIP-Mar-Amendment.pdf>
- 2019 Meeting dates -- <https://www.srtc.org/wp-content/uploads/2019/03/SRTC-Board-TTC-Meeting-Dates-2019.pdf>