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Region 10,
Seattle, Washington

Transportation Management Area Planning Certification Review

Spokane, WA Transportation Management Area

Spokane Regional Transportation Council

January 4, 2024

Summary Report



Table of Contents

EXECUTIVE SUMMARY	3
Summary of 2024 Certification Review	3
INTRODUCTION.....	8
Background	8
Review Process and Scope	8
Structure of this Report.....	10
Documents Reviewed	10
PROGRAM REVIEW	12
MPO Structure and Agreements	12
Metropolitan Transportation Plan	13
Transportation Improvement Program	16
Public Participation	18
Civil Rights (Title VI, EJ, LEP, ADA)	20
Congestion Management Process.....	24
APPENDIX A – 2024 TMA Certification Review Transmittal Letter	25
APPENDIX B – Certification Review Participants	27
APPENDIX C – Public Input Survey Results	28
APPENDIX D – SRTC 2020 TMA Certification Review Federal Actions and Disposition.....	35
APPENDIX E – List of Acronyms	38



EXECUTIVE SUMMARY

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) are required to review, evaluate, and certify the transportation planning process for Transportation Management Areas (TMA) at least every four years. The Spokane Regional Transportation Council (SRTC), as the TMA for the Spokane, WA urbanized area, is the subject of this certification review.

The 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.

Summary of 2024 Certification Review

Based on our review, FHWA and FTA found that the metropolitan transportation planning process conducted by Spokane Regional Transportation Council generally meets all federal planning requirements. A summary of the certification review findings is provided below in Table 1.

FHWA and FTA conducted the review in cooperation with the Washington State Department of Transportation (WSDOT), SRTC, and Spokane Transit Authority (STA). Overall, the review was positive, and the Federal Review Team appreciates all the assistance provided by participating agencies. A copy of the transmittal letter for this report is included in [Appendix A](#).

No serious compliance issues (corrective actions) were identified but recommendations are included in this report that warrant attention and follow-up to further enhance the transportation planning process. In addition, there are areas where the Federal Review Team identified commendations for noteworthy planning practices. Additional details of the findings for each of the topic areas are contained in the body of this report. In summary, 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 TMA.

Table 1, below, includes a description of the recommendations and commendations identified by the Federal Review Team during the 2024 Certification Review.



Table 1. SRTC 2024 TMA Certification Review Federal Actions

Review Area	Commendations/Recommendations
MPO Structure and Agreements – 23 U.S.C. 134(d), 23 CFR 450.314(a)	<p>Commendation: The Federal Review Team commends Spokane Regional Transportation Council for including Tribal representation on their Board of Directors and on their Transportation Technical Committee and for their involvement in the development of the Metropolitan Transportation Plan and Transportation Improvement Program.</p> <p>Recommendation: The Federal Review Team recommends that SRTC conduct a regular review and update any agreement between the MPO and planning partners, as needed, to reflect new membership and/or other changes that have occurred since the last approval.</p>
Metropolitan Transportation Plan – 23 U.S.C. 134(c),(h)&(i), 23 CFR 450.324	<p>Recommendation: The Federal Review Team recommends that the next MTP update include more information of non-regionally significant projects (capital and non-capital) within programmatic areas. Project information (e.g., estimated costs, schedule, location, description), to the extent and detail that can be identified, should be provided, especially for short-range projects.</p> <p>Recommendation: The Federal Review Team recommends the next update of the MTP include a list of needs, including estimated costs, by program areas that cannot be funded by available, planned revenue sources.</p> <p>Recommendation: The Federal Review Team recommends that the next update of the MTP demonstrate how the existing and future regional transportation system can be adequately maintained, operated, and preserved with revenues that are forecasted to be reasonably available.</p> <p>Recommendation: The Federal Review Team recommends that the next MTP update should more clearly identify sources of potential new revenue to cover any identified shortfall, including strategies for potential availability for additional investments. If all identified investment needs cannot be funded by constrained revenues, then an analysis of consequences of the ability to meet performance measures should be documented.</p> <p>Recommendation: The Federal Review Team recommends that the next MTP update consider the future availability and application of various new technology improvements, including vehicle fuels, vehicle automation, and other intelligent transportation systems.</p> <p>Recommendation: The Federal Review Team recommends that SRTC reference and describe how they have integrated the goals, objectives, performance measures and targets described in other State Transportation Plans referenced in 23 CFR 450.306(d)(4) including State and Transit Asset Management Plans and Safety Plans, Freight Plan, and Congestion Management Process.</p>



[Transportation Improvement Program – 23 U.S.C. 134 \(c\),\(h\)&\(j\), 23 CFR 450.326](#)

Commendation: The Federal Review Team supports SRTC’s goal of creating an interactive SRTC TIP tools and map that utilize progressive technology, specifically software as a service (SaaS). This approach aims to enhance TIP functionality and efficiency for local member agencies and SRTC staff. These tools include a user-friendly public portal that facilitates easy access to information, maps, and the submission of public comments. These tools can be enhanced in future iterations of the TIP, including amendments.

Recommendation: The Federal Review Team recommends that SRTC staff conduct training for their new Board and Committee members regarding the applicable transportation planning requirements of 23 CFR 450.336(a) to ensure the Board is aware of SRTC’s self-certification responsibility. SRTC is required to self-certify that the transportation planning process is in compliance with each of these statutes when submitting a new Transportation Improvement Program (TIP).

Recommendation: The Federal Review Team recommends that in the next Transportation Improvement Program (TIP), SRTC describe to the maximum extent practicable how that program of projects helps to achieve the performance targets outlined in their Metropolitan Transportation Plan (MTP), linking investment priorities to those performance targets.

Recommendation: The Federal Review Team recommends that SRTC continue the development and enhancement of interactive TIP and map tools.

Recommendation: The Federal Review Team recommends that SRTC improve the TIP connection to the annual Obligation Reports with a description of the monitoring procedures and documentation of how these procedures are used to monitor results and to improve future TIPs. The hyperlink to the annual reports could be improved by being more specific than the main SRTC website.

Recommendation: The Federal Review Team recommends that SRTC expand methods used to solicit and collect public comments to ensure the public is adequately informed of proposed projects and potentially increase the extent and number of public comments.

[Public Participation 23 U.S.C. 134\(i\)\(6\) 23 CFR 450.316 & 450.326\(b\)](#)

Commendation: The Federal Review Team commends SRTC for the robust tailor-made strategies it has developed for Title VI and EJ populations. In the future, we look forward to the engagement methods that SRTC is considering, such as reimbursement for focus groups, workshops, surveys, and bus passes for in-person meetings and events. We look forward to the work and guidance developed by the Equity Planning Workgroup.

Commendation: The Federal Review Team commends SRTC for its 2021 Public Participation Plan. The Team found the plan to be clear and concise, making good use of graphics. The MPO engages the public broadly, through many forms of media.

Recommendation: The Federal Review Team recommends SRTC include a glossary of frequently used planning terms, acronyms and/or terms of art that are frequently used in the planning process. When determining which terms should be included in the glossary, SRTC may consider convening community stakeholders without a background in transportation and those with disabilities.

Recommendation: The Federal Review Team recommends SRTC make the PPP accessible to people with disabilities. It may be beneficial to use Section 508 Standards and/or Web Content Accessibility Guidelines to guide accessibility updates.



	<p>Recommendation: The Federal Review Team recommends SRTC distinguish written translation services from oral interpretation services within the PPP and clearly indicate throughout all language service notifications that these services are provided free of charge.</p> <p>Recommendation: The Federal Review Team recommends SRTC update the PPP to reflect the four Title VI protected classes: race, color, national origin, and sex, as defined by Section 162 (a) of the Federal-Aid Highway Act of 1973.</p>
<p>Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324, Age Discrimination Act, Sec. 504 Rehabilitation Act, Americans with Disabilities Act, Executive Order #12898, Executive Order #13166</p>	<p>Recommendation: The Federal Review Team recommends SRTC only include Title VI protected classes of race, color, national origin, and sex (as expanded by Section 162 (a) of the Federal-Aid Highway Act of 1973) in its Title VI Plan and Title VI Notice to the Public. If SRTC elected to create a Notice of Nondiscrimination inclusive of other protected classes due to other regulatory requirements, the Federal Review Team recommends SRTC change the title of the notice to “Notice of Nondiscrimination”.</p> <p>Recommendation: The Federal Review Team recommends SRTC update its Title VI authorities and citations to reflect the most relevant applicable authorities.</p> <p>Recommendation: The Federal Review Team recommends that SRTC develop separate ADA and Title VI complaint processes, as well as separate complaint forms. This will ensure stakeholders know which process applies to them.</p> <p>Recommendation: The Federal Review Team recommends that SRTC address retaliation protections in a separate statement. Retaliation is an act that complainants are protected from, not a protected basis for a discrimination complaint.</p> <p>Recommendation: The Federal Review Team recommends that SRTC translate the Title VI complaint form in all languages that fall over the threshold of the Safe Harbor provision.</p> <p>Recommendation: The Federal Review Team recommends SRTC ensure TTY information is accessible across its plans and website to ensure accessibility for people with disabilities.</p> <p>Recommendation: The Federal Review Team recommends that SRTC identify the discrimination complaint process in plain language in order to ensure public accessibility.</p> <p>Recommendation: The Federal Review Team recommends that SRTC distinguish written translation services from oral interpretation services and clearly indicate throughout all language service notifications that these services are provided free of charge.</p> <p>Recommendation: The Federal Review Team recommends that SRTC provide direction to language access services, translated into the represented languages, on its homepage, and move the translation widget to the top of the page, ensuring it is also translated.</p>



	<p>Recommendation: The Federal Review Team recommends SRTC utilize the four-factor analysis to identify agency vital documents, translate identified vital documents, and make them accessible along with English-only documents on its website.</p> <p>Recommendation: The Federal Review Team recommends that SRTC ensure its public-facing plans are accessible to people with disabilities. A number of accessibility resources are available, including but not limited to Section 508 Standards and Web Content Accessibility Guidelines.</p>
<p>Congestion Management Process, 23 U.S.C. 134(k)(3) 23 CFR 450.322</p>	<p>None.</p>



INTRODUCTION

Background

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMAs) at least every four years, per 23 U.S.C. 134(k) and 49 U.S.C. 5303(k). Spokane Regional Transportation Council (SRTC) is defined as a TMA by the U.S. Census Bureau for the Spokane, WA urbanized area and is the subject of this review.

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) air quality conformity requirements contained in 40 CFR 51—Requirements for Preparation, Adoption, and Submittal of Implementation Plans.

The certification review is focused on compliance with federal regulations and the cooperative relationship among SRTC, WSDOT, STA, and other MPO members and stakeholders.

The certification review process is part of the overall federal review of the MPO processes and compliance with applicable statutes and regulations. Other review activities include Unified Planning Work Program (UPWP) approval, Air Quality Conformity Determinations for the Transportation Improvement Program (TIP) and Metropolitan Transportation Plan (MTP), as well as other ongoing opportunities to participate in the planning process.

Review Process and Scope

The TMA certification review process is lengthy and intensive. The Federal Review Team initiated the review process in July 2023 with a review of key documents to refine the scope of the review and concluded in January 2024 with this report.

The six major topic areas below were identified as the focus of the review. Findings and recommendations are summarized for each topic in the body of this report:

- MPO Structure and Agreements
- Metropolitan Transportation Plan (MTP)
- Transportation Improvement Program (TIP)



- Public Participation
- Civil Rights (Title VI, EJ, LEP, ADA)
- Congestion Management Process (CMP)

In addition, the Federal Review Team evaluated SRTC’s activities over the past four years to address the recommendations included in the 2020 TMA Certification Review Report. Results are provided in Table 2, located in [Appendix D](#).

Table 3, below, shows a timeline and description of events that took place during the 2024 TMA Certification Review process.

Table 3. 2024 SRTC TMA Certification Schedule of Events

Date	Description
August 2023	SRTC provided FHWA/FTA with a summary of progress to address recommendations from the previous (2020) certification review, and provided information, and current documents requested.
August 2023	FHWA/FTA met with SRTC staff to discuss the TMA certification, the public input process, and confirmed the dates of the on-site meetings.
September 2023	FHWA/FTA completed a desk review of SRTC documents and developed the scope of the review. SRTC posted an online survey to solicit public input.
October 2023	FHWA/FTA, SRTC, WSDOT, and STA held certification review meetings.
November 2023	FHWA/FTA reviewed documents, followed up with SRTC staff, and completed a draft report.
December 2023/January 2024	FHWA/FTA provided the draft report for SRTC review prior to transmitting the final report.

The certification review covers the transportation planning process conducted cooperatively by the MPO, WSDOT, public transportation operators, as well as other MPO planning partners. Participants in the review included representatives of FHWA, FTA, WSDOT, STA, and SRTC staff.



The 2024 TMA certification process consisted of four primary activities:

- A desk review of key documents and planning products.
- Certification review meetings were held on October 24 and October 26, 2023. Participants of the meeting can be found in [Appendix B](#).
- A public survey was conducted to gather input on the SRTC transportation planning process. A summary of public comments received can be found in [Appendix C](#).
- Preparation of this certification report that summarizes the SRTC Certification Review findings and federal actions.

Structure of this Report

For each topic covered during this certification review, this report documents:

- **Regulatory Basis:** Summarizes federal transportation planning requirements and defines where information regarding each planning topic can be found in the Code of Federal Regulations (CFR).
- **Findings:** Statements of fact that define the conditions found during FHWA and FTA's routine stewardship and oversight as well as with information collected through public participation, the desk review, and the onsite review.

Findings may result in the following federal actions:

- **Commendation:** A process or practice that demonstrates noteworthy practices and procedures for implementing the planning requirements.
- **Corrective action:** Indicates a compliance issue where the transportation planning process/product fails to meet one or more requirements of the transportation planning statute and regulations.
- **Recommendation:** Ideas for improvement to processes and practices. Although not a compliance issue, recommendations are provided to improve the transportation planning process and products to better meet federal planning requirements.

Documents Reviewed

The following MPO documents were evaluated as part of this planning process review:

- MPO Bylaws
- Interlocal Agreements
- Congestion Management Process
- Consultant documents (Jan. 2020 – present)
- SRTC-led planning studies
- SRTC FY-2023-2026 TIP and Self-Certification
- Metropolitan Transportation Plan – Horizon 2045
- Coordinated Public Transit-Human Services Transportation Plan 2023
- Public Involvement Plan
- Title VI Plan



- Transportation Performance Management (TPM) documents
- SFY 2024-2025 Unified Planning Work Program



PROGRAM REVIEW

MPO Structure and Agreements

Regulatory Basis

23 U.S.C. 134(d) and 23 CFR 450.314(a) state the MPO, the State, and the public transportation operator shall cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process. These responsibilities shall be clearly identified in written agreements among the MPO, the State, and the public transportation operator serving the MPA.

Findings

- The Spokane Tribe of Indians and Kalispel Tribe have joined SRTC's Board of Directors and Transportation Technical Committee.
- The Interlocal Agreement, signed in 2021, includes information relating to the formation and operation of SRTC and other matters relating thereto. It describes the composition and purpose of the Board of Directors.

Commendation:

- The Federal Review Team commends SRTC for including Tribal representation on their Board of Directors and on their Transportation Technical Committee, and for their involvement in the development of the Metropolitan Transportation Plan and Transportation Improvement Program.

Corrective Action: None

Recommendation:

- The Federal Review Team recommends that SRTC conduct a regular review and update any agreement between the MPO and planning partners, as needed, to reflect new membership and/or other changes that have occurred since the last approval.



Metropolitan Transportation Plan

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.

Findings

- The current MTP (Horizon 2045), adopted December 2021, documents how the plan meets the ten federal planning factors and demonstrates how the plan was prepared in consultation with WSDOT, STA, and other planning partners.
- SRTC has identified environmental justice populations in the planning area and expanded the analysis to include equity in planning to be incorporated as part of the next MTP update.
- Horizon 2045 incorporated references to the Human Service Transit Plan (adopted November 2018), including information on non-urban transit providers and unmet needs for rural public transit services.
- Horizon 2045 considers all modes of travel in the planning process including strategies to increase the safety of the transportation system for motorized and non-motorized users. Bicycle transportation facilities and pedestrian walkways are considered in new construction and reconstruction of transportation facilities.
- The MTP includes the projected transportation demand of persons and goods in the metropolitan planning area over the twenty-year planning horizon. Travel demand forecasting help to identify deficiencies in the future year transportation system and evaluate the impacts of transportation investments, including vehicle travel for use in mobile source emission models that support air quality conformity.



- The MTP includes a project list of regionally significant projects to be funded during the short and long-term plan periods which accounts for approximately 50 percent of the total fiscally constrained program. The remainder of the short and long-range projects are summarized within eight programmatic areas but the plan provides limited information (e.g., estimated costs, location, description) for these non-regionally significant projects.
- SRTC's updated financial plan in the MTP identifies the amount of forecasted funding by revenue type and specifies types of transportation investments that are assumed to be funded by each revenue source. Costs and revenues are expressed in year-of-expenditure (YOE) dollars.
- In total, the financial plan forecast anticipates approximately \$14.3 billion in reasonably available transportation revenues over the planning period, including \$5.7 billion in local and regional revenues, \$4.8 in WSDOT revenues, and \$3.8 billion in STA revenues. Plan investments are constrained by these sources, but the unfunded needs are not fully identified and only two projects are identified as unfunded.
- The MTP states that total revenue falls significantly short of meeting long-term maintenance and operations as well as preservation needs. Much of this appears to be roadway and bridge maintenance but could also include public transportation operations and maintenance.
- The financial plan states that there are several local options that may be considered for use during the next twenty years and specifically identifies local vehicle registration fees and local option sales tax as well as a potential regional transportation benefit district (TBD). It is unclear how much revenue could be generated from these sources and how new revenue would be used.

Commendation: None

Corrective Action: None

Recommendations:

- The Federal Review Team recommends that the next MTP update include more information of non-regionally significant projects (capital and non-capital) within programmatic areas. Project information (e.g., estimated costs, schedule, location, description), to the extent and detail that can be identified, should be provided, especially for short-range projects.
- The Federal Review Team recommends the next update of the MTP include a list of needs, including estimated costs, by program areas that cannot be funded by available, planned revenue sources.
- The Federal Review Team recommends that the next update of the MTP demonstrate how the existing and future regional transportation system can be



adequately maintained, operated, and preserved with revenues that are forecasted to be reasonably available.

- The Federal Review Team recommends that the next MTP update should more clearly identify sources of potential new revenue to cover any identified shortfall, including strategies for potential availability for additional investments. If all identified investment needs cannot be funded by constrained revenues, then an analysis of consequences of the ability to meet performance measures should be documented.
- The Federal Review Team recommends that the next MTP update consider the future availability and application of various new technology improvements, including vehicle fuels, vehicle automation, and other intelligent transportation systems.
- The Federal Review Team recommends that SRTC reference and describe how they have integrated the goals, objectives, performance measures and targets described in other State Transportation Plans referenced in 23 CFR 450.306(d)(4) including State and Transit Asset Management Plans and Safety Plans, Freight Plan, and Congestion Management Process.



Transportation Improvement Program

Regulatory Basis

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.
- 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, cost, funding source, and identification of the agency responsible for carrying out each project.
- Projects need to be consistent with the adopted MTP.
- Must be fiscally constrained.
- The MPO must provide all interested parties with a reasonable opportunity to comment on the proposed TIP.

Findings

- The 2023-2026 Transportation Improvement Program (TIP), approved on October 13, 2022, documents federal and state regulations.
- The TIP recognizes that SRTC is governed by a Board of Directors made up of elected officials from member agencies and representatives, and the Board selects projects through a competitive process designed to ensure that projects are prioritized consistent with the Guiding Principles which were used to develop the MTP.
- The TIP identifies its main purpose, which is to demonstrate that available resources are being used to implement the region's long-range transportation plan, also called a Metropolitan Transportation Plan (MTP), Horizon 2045. The TIP recognizes the requirement that SRTC must ensure consistency between projects and programs in the TIP and the MTP.
- The TIP includes maps of projects by construction year. In the review meeting, SRTC staff mentioned that an online, interactive map was available as well.
- The TIP identifies the status of major projects as a list, and directs the reader to an annual listing published on SRTC's website.
- The TIP identifies the requirement for public comment, identifies that the public involvement process is consistent with SRTC's Public Participation Plan (PPP), and includes public comments in Appendix G. Only one comment was documented in the appendix.

**Commendation:**

- The Federal Review Team supports SRTC's goal of creating an interactive SRTC TIP tools and map that utilize progressive technology, specifically software as a service (SaaS). This approach aims to enhance TIP functionality and efficiency for local member agencies and SRTC staff. These tools include a user-friendly public portal that facilitates easy access to information, maps, and the submission of public comments. These tools can be enhanced in future iterations of the TIP, including amendments.

Corrective Action: None

Recommendations:

- The Federal Review Team recommends that SRTC staff conduct training for their new Board and Committee members regarding the applicable transportation planning requirements of 23 CFR 450.336(a) to ensure the Board is aware of SRTC's self-certification responsibility. SRTC is required to self-certify that the transportation planning process is in compliance with each of these statutes when submitting a new Transportation Improvement Program (TIP).
- The Federal Review Team recommends that in the next Transportation Improvement Program (TIP), SRTC describe to the maximum extent practicable how that program of projects helps to achieve the performance targets outlined in their Metropolitan Transportation Plan (MTP), linking investment priorities to those performance targets.
- The Federal Review Team recommends that SRTC continue the development and enhancement of interactive TIP and map tools.
- The Federal Review Team recommends that SRTC improve the TIP connection to the annual Obligation Reports with a description of the monitoring procedures and documentation of how these procedures are used to monitor results and to improve future TIPs. The hyperlink to the annual reports could be improved by being more specific than the main SRTC website.
- The Federal Review Team recommends that SRTC expand methods used to solicit and collect public comments to ensure the public is adequately informed of proposed projects and potentially increase the extent and number of public comments.



Public Participation

Regulatory Basis

Sections 134(i)(5), 134(j)(1)(B) of Title 23 and Section 5303(i)(5) and 5303(j)(1)(B) of Title 49, require a Metropolitan Planning Organization (MPO) to provide adequate opportunity for the public to participate in and comment on the products and planning processes of the MPO. The requirements for public involvement are detailed in 23 CFR 450.316(a) and (b), which require the MPO to develop and use a documented participation plan that includes explicit procedures and strategies to include the public and other interested parties in the transportation planning process.

Specific requirements include giving adequate and timely notice of opportunities to participate in or comment on transportation issues and processes, employing visualization techniques to describe metropolitan transportation plans and TIPs, making public information readily available in electronically accessible formats and means such as the world wide web, holding public meetings at convenient and accessible locations and times, demonstrating explicit consideration and response to public input, and a periodically reviewing of the effectiveness of the participation plan.

Findings

- The Public Participation Plan (PPP) may be used by the public to identify how to become involved in SRTC's public participation process. Many of the terms used within the document may not be accessible to the layperson or those with disability considerations.
- According to the PPP, individuals may request a translator for meetings, workshops, or any other SRTC-related event. As the PPP does not distinguish between written translations and oral interpretations, stakeholders may assume that only written translation services will be provided during outreach activities. In addition, the PPP does not clearly indicate that language services will be provided "free of charge". Consequently, LEP individuals may be less likely to seek language access services because there is a perceived financial burden involved.
- Appendix A states, "Title VI has been expanded more recently with the addition of the ADA of 1990." This is inaccurate and may confuse stakeholders.

Commendations:

- The Federal Review Team commends SRTC for the robust tailor-made strategies it has developed for Title VI and EJ populations. In the future, we look forward to the engagement methods that SRTC is considering, such as reimbursement for focus



groups, workshops, surveys, and bus passes for in-person meetings and events. We look forward to the work and guidance developed by the Equity Planning Workgroup.

- The Federal Review Team commends SRTC for its 2021 Public Participation Plan. The Team found the plan to be clear and concise, making good use of graphics. The MPO engages the public broadly, through many forms of media.

Corrective Action: None

Recommendations:

- The Federal Review Team recommends SRTC include a glossary of frequently used planning terms, acronyms and/or terms of art that are frequently used in the planning process. When determining which terms should be included in the glossary, SRTC may consider convening community stakeholders without a background in transportation and those with disabilities.
- The Federal Review Team recommends SRTC make the PPP accessible to people with disabilities. It may be beneficial to use Section 508 Standards and/or Web Content Accessibility Guidelines to guide accessibility updates.
- The Federal Review Team recommends SRTC distinguish written translation services from oral interpretation services within the PPP and clearly indicate throughout all language service notifications that these services are provided free of charge.
- The Federal Review Team recommends SRTC update the PPP to reflect the four Title VI protected classes: race, color, national origin, and sex, as defined by Section 162 (a) of the Federal-Aid Highway Act of 1973.



Civil Rights (Title VI, EJ, LEP, ADA)

Regulatory Basis

Title VI of the Civil Rights Act of 1964, prohibits discrimination based upon race, color, and national origin. Specifically, 42 U.S.C. 2000d states that “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.” In addition to Title VI, there are other Nondiscrimination statutes that afford legal protection. These statutes include the following: Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 U.S.C. 324), Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act (ADA) of 1990. ADA specifies that programs and activities funded with federal dollars are prohibited from discrimination based on disability.

Executive Order #12898 (Environmental Justice) directs federal agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. In compliance with this Executive Order, USDOT and FHWA issued orders to establish policies and procedures for addressing environmental justice in minority and low-income populations. The planning regulations, at 23 CFR 450.316(a)(1)(vii), require that the needs of those “traditionally underserved” by existing transportation systems, such as low-income and/or minority households, be sought out and considered.

Executive Order # 13166 (Limited-English-Proficiency) requires agencies to ensure that limited English proficiency persons are able to meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency.

Findings

- SRTC’s Title VI Plan lists age and creed as protected classes. The Civil Rights Act of 1964 does not recognize age or creed as protected classes, which may lead to confusion for stakeholders wishing to file Title VI complaints. SRTC’s Title VI Plan lists additional authorities and citations on page 2 including Title VI of the Civil Rights Act of 1964, 42 USC 2000d to 2000-4; 42 USC 4601 to 4655; 23 USC 109(h); 23 USC 324; DOT Order 1050.2; EO 12250; EO 12898; 28 CFR 50. Some of these authorities do not relate to Title VI or are regulations granting FHWA Title VI authority, which may conflate programmatic requirements. SRTC’s Title VI Notice to the Public lists gender, gender identity or expression, sexual orientation, age, religion, veteran status, familial or marital status, medical condition, or disability as protected classes.



These classes are not protected by Title VI, which may cause confusion for stakeholders.

- Race, color, national origin, and disability are listed as the basis for filing a Title VI complaint on SRTC's website and its Title VI complaint form. Disability is not protected by Title VI, which may cause confusion for stakeholders.
- SRTC's Title VI Plan lists retaliation as a protected basis for filing a discrimination complaint.
- SRTC's Title VI complaint form is only available in English. As a result, LEP individuals who wish to file a discrimination complaint may not have meaningful access to this essential service.
- SRTC's plans and website do not always include TTY information. As a result, it may be difficult for people with disabilities to access services if they are reliant on TTY.
- SRTC's website refers to the Title VI nondiscrimination process as Title VI. The general public may not know what Title VI is. It may therefore be difficult for individuals to locate where they can file a complaint regarding discrimination.
- SRTC's Language Access Plan (LAP) does not differentiate between written translation and oral interpretation. This may lead stakeholders to assume that only written translation services will be provided. In addition, the LAP does not clearly indicate that language services will be provided "free of charge". Consequently, LEP individuals may be less likely to seek language access services because there is a perceived financial burden involved.
- SRTC does not provide a list of translated vital documents on its website. This may hinder meaningful access to services for LEP individuals. SRTC's website offers information about translation services only on its Title VI webpage. The main homepage does not include a language accessibility statement. The translation widget on the homepage is located at the bottom of the page and is only available in English. To access translation services, LEP individuals have to scan an English-only page and read English. Therefore, LEP individuals may not be able to benefit from the programs and services provided by the website.
- SRTC's Title VI, LEP, and PPP are inaccessible to assistive technology. Therefore, people who use assistive technology may have difficulty accessing information in the plans.

Commendation: None

Corrective Action: None

Recommendations:

- The Federal Review Team recommends SRTC only include Title VI protected classes of race, color, national origin, and sex (as expanded by Section 162 (a) of the Federal-Aid Highway Act of 1973) in its Title VI Plan and Title VI Notice to the



Public. If SRTC elected to create a Notice of Nondiscrimination inclusive of other protected classes due to other regulatory requirements, the Federal Review Team recommends SRTC change the title of the notice to “Notice of Nondiscrimination”.

- The Federal Review Team recommends SRTC update its Title VI authorities and citations to reflect the most relevant applicable authorities.
- The Federal Review Team recommends that SRTC develop separate ADA and Title VI complaint processes, as well as separate complaint forms. This will ensure stakeholders know which process applies to them.
- The Federal Review Team recommends that SRTC address retaliation protections in a separate statement. Retaliation is an act that complainants are protected from, not a protected basis for a discrimination complaint.
- The Federal Review Team recommends that SRTC translate the Title VI complaint form in all languages that fall over the threshold of the Safe Harbor provision.
- The Federal Review Team recommends SRTC ensure TTY information is accessible across its plans and website to ensure accessibility for people with disabilities.
- The Federal Review Team recommends that SRTC identify the discrimination complaint process in plain language in order to ensure public accessibility.
- The Federal Review Team recommends that SRTC distinguish written translation services from oral interpretation services and clearly indicate throughout all language service notifications that these services are provided free of charge.
- The Federal Review Team recommends that SRTC provide direction to language access services, translated into the represented languages, on its homepage, and move the translation widget to the top of the page, ensuring it is also translated.
- The Federal Review Team recommends SRTC utilize the four-factor analysis to identify agency vital documents, translate identified vital documents, and make them accessible along with English-only documents on its website.
- The Federal Review Team recommends that SRTC ensure its public-facing plans are accessible to people with disabilities. A number of accessibility resources are available, including but not limited to Section 508 Standards and Web Content Accessibility Guidelines.

Proposed FHWA/FTA Technical Assistance:

- The National Highway Institute offers a training on Risk Mitigation Through Title VI Reviews ([FHWA-NHI-361032B](#)) that Washington State Department of Transportation is hosting for MPOs/RTPOs in early 2024.
- Safe Harbor provisions are identified on page 14 of USDOT’s [Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National](#)



[Origin Discrimination Affecting Limited English Proficient Persons \(transportation.gov\)](#)

- Pages 8-14 of [Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs \(lep.gov\)](#) provides a self-assessment for recipients to identify opportunities to better serve LEP communities.
- USDOT has a [LEP Guidance webpage](#) that details reasonable steps to ensure meaningful access to programs and activities by LEP persons.



Congestion Management Process

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 must also provide an analysis of the need for additional capacity for a proposed improvement over travel demand reduction, and operational management strategies.

Findings

- The CMP addresses congestion management through an eight-step process that provides for safe and effective integrated management and operation of the multimodal transportation system.
- To ensure an effective and regional approach to congestion management, SRTC developed and meets with a CMP Working Group that includes representation from WSDOT, SRTMC, City of Spokane Valley, City of Spokane, Spokane County, STA, TAC, and SRTC.
- SRTC is currently updating their Congestion Management Process. The updated CMP is expected to be adopted in the middle of 2024. The current CMP was adopted in 2014.

Commendation: None

Corrective Action: None

Recommendation: None



APPENDIX A – 2024 TMA Certification Review Transmittal Letter



U.S. Department
of Transportation

U. S. DEPARTMENT OF TRANSPORTATION

FEDERAL HIGHWAY ADMINISTRATION
WASHINGTON DIVISION
SUITE 501, EVERGREEN PLAZA
711 SOUTH CAPITOL WAY
OLYMPIA, WA 98501

FEDERAL TRANSIT ADMINISTRATION
REGION 10
915 SECOND AVENUE, SUITE 3190
SEATTLE, WA 98174

January 4, 2024

Lois Bollenback, Executive Director
Spokane Regional Transportation Council
421 W Riverside Ave., Suite 500
Spokane, WA 99201

Spokane Regional Transportation Council (SRTC) 2024 TMA Certification Review

Dear Ms. Bollenback:

The Bipartisan Infrastructure Law (BIL) retained the requirement for the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) to review and certify the planning processes for Transportation Management Areas (TMAs) at least every four years. The Spokane Regional Transportation Council (SRTC) is the TMA for the Spokane, WA urbanized area (UZA), and the previous TMA certification for SRTC was completed on January 10, 2020.

FHWA and FTA staff conducted a joint review of SRTC's transportation planning process, including meetings on October 24 and October 26, 2023, with staff from SRTC, WSDOT, and Spokane Transit Authority, after a review of key planning documents. Based on the review, the Federal Review Team determined that SRTC meets the requirements for metropolitan transportation planning established under 23 CFR 450, and therefore, we jointly certify the SRTC planning process.

This final report includes a detailed list of our findings and identifies recommendations for continued improvement as well as commendations for work that we want to acknowledge as particularly well done. No corrective actions or compliance issues were identified. Overall, the review was very positive, and we appreciate the time and assistance that your staff provided during this review.



If you have any questions for the Federal Review Team, please contact Matthew Pahs, FHWA Washington Division Office, 360-753-9418, or Ned Conroy of FTA Region 10, 206-220-4318.

Ralph J. Rizzo
Washington Division Administrator
Federal Highway Administration

SUSAN KAY FLETCHER

Digitally signed by
SUSAN KAY FLETCHER
Date: 2024.01.04
12:58:58 -0800

Susan Fletcher
Regional Administrator, Region 10
Federal Transit Administration

Enclosure

- cc: Eve McMenamy, Spokane Regional Transportation Council
Matthew Pahs, Federal Highway Administration
Kelley Dolan, Federal Highway Administration
Ned Conroy, Federal Transit Administration
Danielle Casey, Federal Transit Administration
Steve Call, Federal Highway Administration
Autumn Young, Federal Highway Administration
Shin-Che Huang, Federal Highway Administration
Gabe Philips, Washington State Department of Transportation
Karena Houser, Washington State Department of Transportation



APPENDIX B – Certification Review Participants

The following attendees were involved in the 2024 SRTC TMA Certification Review:

Federal Review Team:

Ned Conroy, Federal Transit Administration, Region 10
Danielle Casey, Federal Transit Administration, Region 10
Ralph Rizzo, Federal Highway Administration, Washington Division
Autumn Young, Federal Highway Administration, Washington Division
Matthew Pahs, Federal Highway Administration, Washington Division
Kelley Dolan, Federal Highway Administration, Washington Division
William “Shay” Witucki, Federal Highway Administration, Washington Division
Shin-Che Huang, Federal Highway Administration, Washington Division
Steve Call, Federal Highway Administration, Headquarters

SRTC:

Lois Bollenback, Executive Director
Eve McMenamy, Deputy Executive Director
Ryan Stewart, Principal Transportation Planner
Mike Ulrich, Principal Transportation Planner
Jason Lien, Principal Transportation Planner
David Fletcher, Principal Transportation Planner
Michael Redlinger, Associate Transportation Planner II
Greg Griffin, Administrative Services Manager
Savannah Hayward, Communications and Public Relations Coordinator
Angel Jackson, Administrative Executive Coordinator

STA:

Karl Otterstrom, Chief Planning and Development Officer
Tara Limon, Associate Transit Planner

WSDOT:

Charlene Kay, Washington State Department of Transportation
Gabe Phillips, Washington State Department of Transportation
Shauna Harshman, Washington State Department of Transportation



APPENDIX C – Public Input Survey Results

This section includes the results from a survey created and administered by SRTC to receive public input on SRTC’s transportation planning process. Note: The first page of this survey was removed because it had personal information about survey respondents. Pages 2 and 4 of this survey were also removed because they were blank. The survey results start with Question 2 on page 3 of this survey.

SRTC TMA Certification Public Comments

Q2 What organization are you representing? (If none, please write "public")

Answered: 33 Skipped: 0

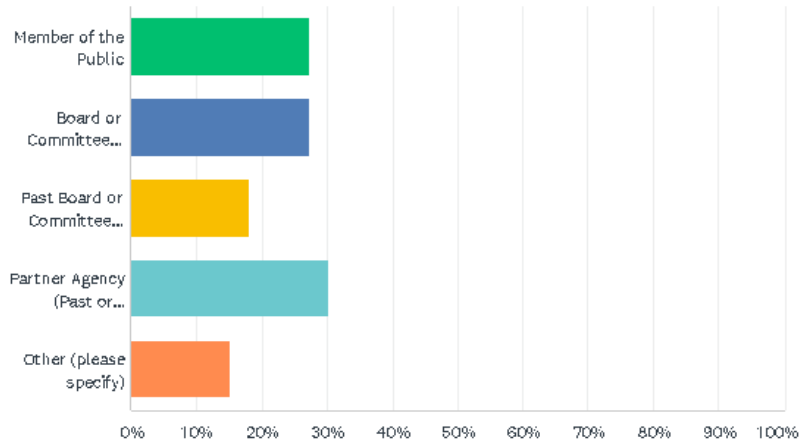
#	RESPONSES	DATE
1	Washington State Transportation Commission	10/24/2023 2:23 PM
2	WSDOT	10/23/2023 3:07 PM
3	City of Spokane Valley	10/23/2023 1:02 PM
4	Chelan-Douglas Transportation Council	10/23/2023 12:01 PM
5	Spokane Transit	10/23/2023 11:37 AM
6	Washington State Dept. of Transportation	10/23/2023 9:48 AM
7	City of Spokane Valley	10/23/2023 9:26 AM
8	Washington State Transportation Commission	10/23/2023 9:20 AM
9	Spokane Regional Health District	10/23/2023 8:45 AM
10	City of Spokane	10/23/2023 7:49 AM
11	Public	10/22/2023 8:45 AM
12	City of Spokane	10/20/2023 2:58 PM
13	public	10/20/2023 2:07 PM
14	City of Spokane Valley	10/20/2023 1:59 PM
15	Spokane Regional TAC Council	10/20/2023 12:53 PM
16	Town of Fairfield	10/16/2023 9:04 AM
17	Public	10/11/2023 3:04 PM
18	City of Deer Park	10/10/2023 11:22 AM
19	Public	10/9/2023 2:56 PM
20	Spokane Transit	10/9/2023 10:29 AM
21	All Aboard Washington	10/7/2023 1:32 PM
22	Public	10/6/2023 7:03 PM
23	Public	10/5/2023 8:03 PM
24	Chief Garry Park	10/5/2023 5:01 PM
25	Spokane Valley	10/5/2023 10:55 AM
26	Spokane Regional Health District	10/5/2023 10:25 AM
27	Logan Neighborhood Council	10/4/2023 9:35 PM
28	Public	10/4/2023 5:40 PM
29	Traffic engineering consultants	10/4/2023 5:15 PM
30	Neighborhood Alliance of Spokane County	10/4/2023 4:43 PM
31	City of Millwood	10/4/2023 4:10 PM
32	City of Liberty Lake, soon to be "public" again :)	10/4/2023 3:11 PM
33	SRTC Freight Representative	10/4/2023 3:08 PM



SRTC TMA Certification Public Comments

Q3 What is your relationship to SRTC?

Answered: 33 Skipped: 0



ANSWER CHOICES	RESPONSES
Member of the Public	27.27% 9
Board or Committee Member	27.27% 9
Past Board or Committee Member	18.18% 6
Partner Agency (Past or Present)	30.30% 10
Other (please specify)	15.15% 5
Total Respondents: 33	

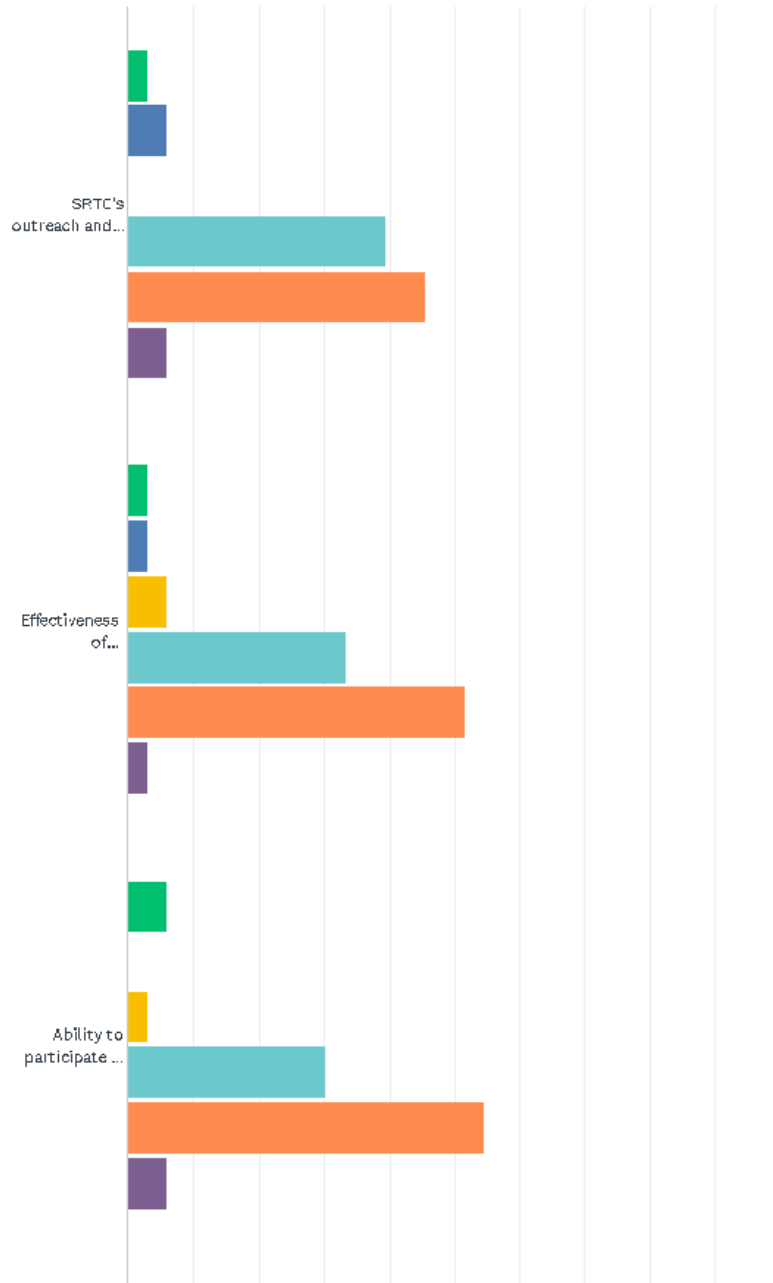
#	OTHER (PLEASE SPECIFY)	DATE
1	Director of another MPO in Washington State	10/23/2023 12:01 PM
2	Alternate	10/23/2023 7:49 AM
3	AAWA is an educational and advocacy group supporting improved passenger rail service in Washington State and in the PNW region.	10/7/2023 1:32 PM
4	City Planner	10/4/2023 4:10 PM
5	Mayor's substitute - attend Board meetings virtually	10/4/2023 3:11 PM



SRTC TMA Certification Public Comments

Q4 How satisfied are you with the following:

Answered: 33 Skipped: 0



6 / 10



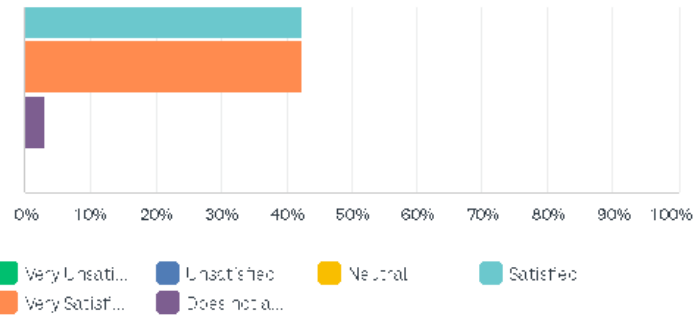
SRTC TMA Certification Public Comments



7 / 10



SRTC TMA Certification Public Comments



	VERY UNSATISFIED	UNSATISFIED	NEUTRAL	SATISFIED	VERY SATISFIED	DOES NOT APPLY TO ME	TOTAL	WEIGHTED AVERAGE
SRTC's outreach and communication efforts	3.03% 1	6.06% 2	0.00% 0	39.39% 13	45.45% 15	6.06% 2	33	4.26
Effectiveness of communication in planning documents and materials	3.03% 1	3.03% 1	6.06% 2	33.33% 11	51.52% 17	3.03% 1	33	4.31
Ability to participate in SRTC planning activities and processes	6.06% 2	0.00% 0	3.03% 1	30.30% 10	54.55% 18	6.06% 2	33	4.35
Ease of working with SRTC on projects	3.03% 1	0.00% 0	3.03% 1	36.36% 12	51.52% 17	6.06% 2	33	4.42
SRTC's overall planning activities	3.13% 1	0.00% 0	3.13% 1	31.25% 10	59.88% 19	3.13% 1	32	4.48
Responsiveness of SRTC Staff	3.03% 1	0.00% 0	3.03% 1	15.15% 5	72.73% 24	6.06% 2	33	4.65
Ease of accessing information on SRTC's website	3.03% 1	6.06% 2	3.03% 1	42.42% 14	42.42% 14	3.03% 1	33	4.19



SRTC TMA Certification Public Comments

Q5 What words would you use to describe SRTC as an organization?
 (One to three)

Answered: 31 Skipped: 2

#	RESPONSES	DATE
1	collaborative; engaging	10/24/2023 2:23 PM
2	Model MPO/RTPO	10/23/2023 3:07 PM
3	Inclusive, thoughtful, future-focused	10/23/2023 1:02 PM
4	Comprehensive Rigorous Proactive	10/23/2023 12:01 PM
5	Professional, Advanced	10/23/2023 11:37 AM
6	Collaborative, multimodal	10/23/2023 9:48 AM
7	Helpful and strategic	10/23/2023 8:26 AM
8	Facilitator, Forward Thinking, Regional Vision	10/23/2023 9:20 AM
9	Striving Forward	10/23/2023 8:45 AM
10	Dedicated, professional team	10/23/2023 7:49 AM
11	Thorough, Transparent, Important	10/22/2023 8:45 AM
12	Collaborative	10/20/2023 2:58 PM
13	considerate, professional, deep domain knowledge	10/20/2023 2:07 PM
14	Professional, responsive, kind.	10/20/2023 1:59 PM
15	Driven, Inclusive, Open	10/20/2023 12:53 PM
16	large city partial	10/16/2023 9:04 AM
17	good	10/10/2023 11:22 AM
18	Capable, Thoughtful, Driven	10/9/2023 2:56 PM
19	Knowledgeable, Communicates well	10/9/2023 10:29 AM
20	We very much appreciate SRTC's including us on notices of meetings and opportunities (like this one) to comment.	10/7/2023 1:32 PM
21	Useful	10/6/2023 7:03 PM
22	taking input well	10/5/2023 5:01 PM
23	Efficient, supportive	10/5/2023 10:55 AM
24	Hard working staff	10/5/2023 10:25 AM
25	Technical, esoteric	10/4/2023 9:35 PM
26	Effective	10/4/2023 5:40 PM
27	Insulated	10/4/2023 5:15 PM
28	Flexible and well-staffed all around.	10/4/2023 4:43 PM
29	Collaborative	10/4/2023 4:10 PM
30	Efficient, responsible, growing	10/4/2023 3:11 PM
31	Very professional and well managed	10/4/2023 3:08 PM



SRTC TMA Certification Public Comments

Q6 Is there anything you would like the Federal Review team to know as they review our TMA certification?

Answered: 21 Skipped: 12

#	RESPONSES	DATE
1	Really impressed with the SRTC staff and commitment to supporting regional collaboration and input.	10/24/2023 2:23 PM
2	Great planning partner! Often looked to for best practices.	10/23/2023 3:07 PM
3	I have worked with other MPOs across the state and have been most impressed with SRTC and often refer to them as an example for others to follow	10/23/2023 1:02 PM
4	SRTC is an effective state-wide collaborator, and plays an important role in Washington's MPO community as a thought leader (and demonstrator) on best practices in transportation planning.	10/23/2023 12:01 PM
5	SRTC has continued to deepen its capacity and technical acumen. It's clear there is intentionality in developing staff and advancing sound planning objectives.	10/23/2023 11:37 AM
6	No	10/23/2023 8:45 AM
7	The MPO doesn't get the recognition they deserve in helping maintain a regional and long term outlook. Hopefully this recertification process can highlight our MPO's efforts.	10/23/2023 7:49 AM
8	I've been associated with SRTC for over 20 years. This is the best version of the agency I've witnessed. Strong leadership, cohesive and highly competent team, passionate about the region.	10/20/2023 2:07 PM
9	N/A	10/20/2023 1:59 PM
10	Great team currently on the board. Great communication.	10/20/2023 12:53 PM
11	no	10/16/2023 9:04 AM
12	SRTC's leadership in the Spokane Region is notable and appreciated. By nature, the MPO is built to resolve local jurisdictional differences, build consensus and regional priorities, and award and manage federal funds. No small task due to similar but often competing local interests. SRTC handles these items thoughtfully, with clearly developed and documented policies, priorities, and metrics. I am impressed with the care taken to ensure the TAC is built to represent robust transportation interests and perspectives, with equity at the forefront.	10/9/2023 2:56 PM
13	Electric cars and busses save the air	10/6/2023 7:03 PM
14	citizen input is important.	10/5/2023 5:01 PM
15	No	10/5/2023 10:55 AM
16	Traffic engineering is more complex than most neighbors have time or interest for. But the public needs to weigh in for the TMA certification? Not applicable. sorry	10/4/2023 9:35 PM
17	Lacking strategy for long term maintenance funding.	10/4/2023 5:40 PM
18	As a traffic consultant. I am not allowed to be on the Technical Committee OR the Citizen's Advisory Committee. Yet this is my profession! I might have something to add to the conversation.	10/4/2023 5:15 PM
19	(See above.)	10/4/2023 4:43 PM
20	As a past critic of SRTC, in recent years it has become a MUCH more collaborative, open to all input, responsible for State/Fed \$\$\$ and its leadership/staff is/are doing a great job!	10/4/2023 3:11 PM
21	SRTC has a wonderful team that work well together. Their presentations to the board of directors are complete and well thought out prior to presenting to the board. Community feedback is extremely important to this organization on all of the issues.	10/4/2023 3:08 PM



APPENDIX D – SRTC 2020 TMA Certification Review Federal Actions and Disposition

This section covers activities by SRTC following the 2020 TMA Certification Review. All corrective actions and recommendations are included in Table 2.

Table 2. SRTC 2020 TMA Certification Review Federal Actions and Disposition

Review Area	Corrective Actions/ Recommendations	Disposition
Unified Planning Work Program	Recommendation: 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.”	SRTC updated the document format to represent timelines, milestones, and deliverables more accurately. SRTC also ensured agency documents are available on the SRTC website. 6/21/21. The SFY 2024-2025 UPWP maintains the updated format. 7/6/23
Performance-Based Planning and Programming/ Transportation Performance Management	Recommendation: 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.	The Board has also adopted Spokane Transit Authority Asset Management and Public Transit Safety Targets. 3/11/21 Horizon 2045 adopted by the SRTC Board on Dec 14, 2021 includes a discussion on all regional performance measures and a project listing linking performance management to decision making, Table 4.22. The document also includes the required system performance report, Appendix D. 2/1/2022 The SRTC Board is continuing to support statewide performance targets at the four year cycle review. Board resolutions supporting state targets occurred Feb 2023-June 2023. 7/6/23 SRTC through Board actions is agreeing to plan and program projects in support of all State performance targets. The associated Board resolutions are as follows: Safety R-23-06 (2/9/23), Infrastructure R-23-10 (4/13/23), System Performance R-23-13 (5/11/23).



		<p>The SRTC Call for projects prioritization process includes criteria directly related to federal TPM focus areas. 7/6/23</p>
<p>Metropolitan Transportation Plan Development</p>	<p>Recommendation: 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>Recommendation: 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>Recommendation: 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>	<p>SRTC has begun the process of identifying environmental justice populations in Spokane County based on current state of best practice. This analysis will initially be applied to the Freight Study, but we've built an expanded analysis into our 22-23 UPWP. 3/11/2021</p> <p>SRTC's updated financial plan in the MTP clearly identifies the amount of forecasted funding by revenue type. It also specifies what types of transportation investments are assumed to be funded by each revenue source. 12/14/21</p> <p>Horizon 2045 incorporated references to the CPT-HSTP, including information in Strategy 4: Invest in Public Transit. 12/14/21</p>
<p>Public Participation and Outreach</p>	<p>Recommendation: 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>	<p>SRTC work on the TIP, Census 2020, and related programs involved notification to tribal entities. In addition, consultation with the tribes has been ongoing with the update to SRTC's ILA and inclusion of tribal members on the Board of Directors. Tribal representation is also provided through our Transportation Technical Committee. 3/11/21</p>



		<p>The Spokane Tribe of Indians and the Kalispel Tribe of Indians became SRTC Board members on 12/22 and 2/23 respectively. 7/6/23</p> <p>SRTC, through its communication strategy provides check in with our members. Recently the Executive Director met with the new Spokane Tribal Board member on date and the Executive Director and Deputy Director had an onboarding meeting with the new Kalispel Tribal Board and alternate on 7/6/23.</p>
Title VI, Environmental Justice, and Related Requirements	Recommendation: The Federal Team recommends adding more Spanish options on the main SRTC web site to better reach the Spanish-speaking population.	A translation feature was installed on the website that allows changing the language of any page on the website to Spanish, Russian, Filipino or Vietnamese by just clicking a button. 3/11/21



APPENDIX E – List of Acronyms

- ADA:** Americans with Disabilities Act
- CFR:** Code of Federal Regulations
- CMP:** Congestion Management Process
- DOT:** Department of Transportation
- EJ:** Environmental Justice
- EPA:** Environmental Protection Agency
- FHWA:** Federal Highway Administration
- FTA:** Federal Transit Administration
- FY:** Fiscal Year
- HSTP:** Human Services Transportation Plan
- LAP:** Language Access Plan
- LEP:** Limited-English-Proficiency
- MPA:** Metropolitan Planning Area
- MPO:** Metropolitan Planning Organization
- MTP:** Metropolitan Transportation Plan
- PPP:** Public Participation Plan
- SFY:** State Fiscal Year
- SRTC:** Spokane Regional Transportation Council
- STA:** Spokane Transit Authority
- STIP:** State Transportation Improvement Program
- TAC:** Transportation Advisory Committee
- TTC:** Transportation Technical Committee
- TIP:** Transportation Improvement Program
- TMA:** Transportation Management Area
- U.S.C.:** United States Code
- UPWP:** Unified Planning Work Program
- USDOT:** United States Department of Transportation
- YOE:** Year of Expenditure



Report prepared by:

**FHWA Washington Division
Office**

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