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January 10, 2018

Mr. Jim Wood
Chief Planner
Florida Department of Transportation
605 Suwannee Street
Tallahassee, FL 32399-0450

Dear Mr. Wood:

Over the past few months, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) have worked closely with the Florida Department of Transportation (FDOT), the Metropolitan Planning Organization Advisory Council (MPOAC), and Florida's MPOs to clearly identify and document our expectations related to meeting federal requirements for the Long Range Transportation Plans (LRTPs) currently underway or being initiated within the next year or so. As a result of this coordination, we have developed the enclosed Federal Strategies for Implementation Requirements for LRTP Updates for the Florida Metropolitan Planning Organizations (MPOs).

Please share this information with other FDOT and MPO partners as deemed appropriate. We wish to thank FDOT and MPOAC, serving as the coordinating body for MPO input, for their assistance in this effort. The input received was considered and integrated into the final document and specifically addressed in the comment response document that will be released shortly. We look forward to our continued partnership to further the transportation goals of the MPOs and FDOT during the coming years.

If you have any questions, please do not hesitate to contact Ms. Karen Brunelle at (850) 553-2218 or karen.brunelle@dot.gov.

Sincerely,

FOR: James Christian, P.E.
Division Administrator
Federal Highway Administration

Enclosure: Federal Strategies for Implementation Requirements for LRTP Updates for the Florida MPOs

cc: Ms. Carmen Monroy, FDOT (MS-28)
Mr. Keith Melton, FTA (Region IV)
Mr. Carl Mikyska, MPOAC (MS-28B)
Mr. Mark Reichert, FDOT (MS-28)

Federal Strategies for Implementing Requirements for LRTP Updates for the Florida MPOs

January 2018

The Federal Highway Administration (FHWA), in cooperation with the Federal Transit Administration (FTA), developed this document to provide clarification to the Florida Department of Transportation (FDOT) and Florida's Metropolitan Planning Organizations (MPOs) regarding our expectations for meeting some of the requirements to be addressed in the next cycle of Long Range Transportation Plan (LRTP) updates. 23 CFR 450.306, 316 and 324 describe the basic requirements of the scope of the metropolitan transportation planning process, including a documented public participation plan, and development and content of the LRTPs respectively.

Addressing Current Requirements

The following information is presented to highlight notable areas for improvement, as well as those of potential concern, in order to proactively assist the MPOs in meeting federal planning requirements. These topic areas were selected based on a past history of issues observed with them through our general stewardship responsibilities, or through the oversight responsibilities via the Transportation Management Area (TMA) certification reviews. FHWA and FTA would be pleased to work with FDOT and the MPOs to discuss interpretation examples and/or statewide templates as appropriate to support implementation consistency. Additional areas of concern may be addressed on an individual MPO basis as needed throughout the LRTP development process. Citations noted refer to regulations published in the May 27, 2016 *Federal Register*.

Stakeholder Coordination and Input

Specific Public Involvement Strategies: MPOs are required to develop a written plan that documents and explicitly describes the procedures, strategies, and outcomes of stakeholder involvement in the planning process for all the MPOs products and processes, including, but not limited to, the timing of and timeframe for public/stakeholder input on the LRTP and its amendments. The MPOs should take the time to ensure their LRTP outreach strategies in their public participation plan (PPP), whether documented in an overall MPO PPP or one specifically for LRTP outreach, are clear, transparent, and accurately describes when and how their stakeholders can be involved in the process. To this end, having non-transportation professional(s) review the document and provide their understanding of when and how long the public comment periods occur for the various planning products can be helpful to ensure the information is being interpreted as intended. {23 CFR 450.316(a)(1)}

Public Involvement/Tribal/Resource Agency Consultation: Consultation on the MPO's planning products (including the LRTP) with the appropriate Indian Tribal governments and Federal land management agencies (when the planning area includes such lands) is required to be documented. The interaction documentation with these stakeholders needs to outline the roles, responsibilities and key decision points for consulting with other governments and agencies. MPOs should ensure that their plans and/or documentation include such procedures.

Additionally, State and local agencies responsible for land use management, natural resources, environmental protection, conservation and historic preservation are required to be consulted during the development of the

LRTP. This consultation consists of comparisons of state conservation plans/maps, and inventories of natural or historical resources with transportation plans, as appropriate and if available. This consultation process is also required to be documented, ideally in the public participation plan. Note that the Tribal governments and resource agencies mentioned above are also required to be involved in the development of the various consultation processes with these agencies. {23 CFR 450.316(a)(1), (c), (d), (e); 23 CFR 450.324(g)}

Measures of Effectiveness: Many MPOs have what appear to be very successful strategies for reaching out and incorporating public comment into their products and processes. However, there is no systematic confirmation or validation that the strategies are indeed working. MPOs are required to periodically review the effectiveness of the procedures and strategies described within the public participation plan (PPP). The PPP is also required to contain the specific measures used, the timing of, and the process used to evaluate the MPO's outreach and PPP strategies. Ideally, once the LRTP is developed, the outreach is evaluated, and then any needed changes to the outreach process are incorporated and documented in the PPP prior to the next LRTP update. {23 CFR 450.316(a)(1)(x)}

Fiscal Constraint

Project Phases: Projects in LRTPs are required to be described in enough detail to develop cost estimates in the LRTP financial plan that show how the projects will be implemented. For a project in the cost feasible plan, the phase(s) being funded and the cost must be documented. Additionally, the source of funding for each phase must be documented in the first 10 years of the LRTP. The phases to be shown in LRTPs include Preliminary Engineering (PE), Right of Way (ROW) and Construction. PE includes both the Project Development and Environment (PD&E) and Design phases. FHWA and FTA support the option of combining the PD&E and Design phases into an overall PE phase for these long range estimates. Boxed funds can be utilized as appropriate to document the financing of smaller projects, such as sidewalks, or early phases of projects, such as PD&E. However, the individual projects utilizing the box need to be listed, or at a minimum, sufficiently described in bulk in the LRTP (i.e. PD&E for projects in Years 2020-2025). {23 CFR 450.324(f)(9), (f)(11); 23 CFR 450.326(h)}

Full Time Span of LRTP (1st 5 Years): Plans are required to have at least a 20-year horizon. The effective date of the LRTP is the date of the MPO adoption of the plan. As such, the MPO is required to have an LRTP that includes projects from the date of adoption projected out at least 20 years from that date. The LRTP is a planning document that describes how the proposed projects will help achieve the regional vision. The Transportation Improvement Program (TIP), however, is a reflection of the investment priorities which are established in the LRTP. When adopting an updated LRTP, the projects in the previous LRTP are assessed and revised to acknowledge projects that have: 1) moved forward (these are typically removed from the updated LRTP), 2) shifted in time (these could be moved forward or back in implementation in the updated LRTP), and 3) been added or deleted based on the MPO's current priorities. The TIP is only a resource for determining which projects have moved forward. **The TIP, which is based on the previous LRTP, is not a substitute for the first 5 years of the updated LRTP.** Additionally, the TIP is a 4-year programming document that, in Florida, is adopted every year and thus expires annually. When LRTPs "include the TIP", it is a reference to a static and outdated document once the next TIP is incorporated into the Statewide Transportation Improvement Program (STIP), which occurs annually in Florida Therefore, the MPOs will need to show all of the projects, phases, and

estimates from the adoption date through the horizon year of the LRTP, which is considered the entire time period of the LRTP. In addition, funding sources need to be shown for all projects from the adoption date through the first 10 years. {23 CFR 450.324(a); 23 CFR 450.326(a)}

Technical Topics

SHSP Consistency: We have come a long way from "What is the Strategic Highway Safety Plan (SHSP)?" to having LRTPs address the safety of all users throughout the planning process. We have proactively and successfully encouraged the MPOs to include a safety element in their LRTPs and be consistent with the Florida SHSP. The changes to the planning regulations now require the goals, objectives, performance measures and targets of the Highway Safety Improvement Program (HSIP), which includes the SHSP, to be integrated into the LRTPs either directly or by reference. However, the specific priorities, strategies, countermeasures and projects of the HSIP are not required to be integrated. We continue to strongly encourage their incorporation where appropriate. {23 CFR 450.306(b)(2), (d)(4)(ii); 23 CFR 324(h)}

The link to FDOT's 2016 SHSP is: http://www.fdot.gov/safety/SHSP2012/FDOT_2016SHSP_Final.pdf

Freight: Florida's MPOs have been proactive in assessing and incorporating their freight needs. Freight shippers and providers of freight transportation services have been required to be incorporated into the stakeholder outreach that the MPO uses throughout the planning process and the LRTP to address the projected demand of goods transportation on the network. Changes to the planning requirements now also encourage the consultation of agencies and officials planning for freight movements. With the National Highway Freight Program a core funding category of federal funds, having a solid basis for incorporating freight needs and projecting the freight demands will be key to the LRTP's success for meeting its regional vision for the goods movement throughout the area. Additionally, the planning regulations now require the goals, objectives performance measures and targets of the State Freight Plan to be integrated into the LRTPs either directly or by reference. While freight is one of the planning factors, it deserves special emphasis, and will need to play a more prominent role in future LRTPs. The MPOs need to show a concerted effort to incorporate freight stakeholders and strategies into the next LRTP. {23 CFR 450.306(b)(4), (b)(6); 23 CFR 450.316(a); 23 CFR 450.324 (b), (f)(1), (f)(5)}

Environmental Mitigation/Consultation: For highway projects, the LRTP must include a discussion on the types of potential environmental mitigation activities and potential areas to carry out these activities. The environmental mitigation discussion in the LRTP must be developed in consultation with Federal, State and Tribal wildlife, land management and regulatory agencies. The LRTP discussion can be at a system-wide level to identify areas where mitigation may be undertaken (perhaps illustrated on a map) and what kinds of mitigation strategies, policies and/or programs may be used when these environmental areas are affected by projects in the LRTP. This discussion in the LRTP would identify broader environmental mitigation needs and opportunities that individual transportation projects might take advantage of later. MPOs should be aware that the use of ETDM alone is not environmental mitigation. The use of ETDM is considered project screening and is not a system-wide review of the planning area. Documentation of the consultation with the relevant agencies should be maintained by the MPO. {23 CFR 450.324(f)(10)}

Congestion Management Process: The management of congestion has played an increasing role in the operations of transportation networks. One of the key activities of the process is to evaluate the effectiveness of the strategies the process produces. The MPO must demonstrate that the congestion management process is incorporated into the planning process. The process the MPO uses can be documented separately or in conjunction with the LRTP. The process is required to: 1) provide for the safe and effective integrated management and operations of the transportation network; 2) identify the acceptable level of performance; 3) identify methods to monitor and evaluate performance; 4) define objectives; 5) establish a coordinated data collection program; 6) identify and evaluate strategy benefits; 7) identity an implementation schedule; and 8) periodically assess the effectiveness of the strategies. The congestion management process should result in multimodal system measures and strategies that are reflected in the LRTP and TIP. The new planning requirements provide for the optional development of a Congestion Management Plan (CMP) that includes projects and strategies that will be considered in the TIP. This optional plan is different than documenting the processes that the MPO uses to address the congestion management. The CMP, if used, needs to 1) develop regional goals, 2) identify existing transportation services and commuter programs, 3) identify proposed projects, and 4) be developed in consultation with entities that provide job access reverse commute or job-related services to low-income individuals. {23 CFR 450.322}

Americans with Disabilities Act (ADA) Transition Plans: Government agencies with 50 or more employees that have control over pedestrian rights of way (PROW) must have transition plans for ADA. Agencies with less than 50 employees that have control over PROW must have an ADA Program Access Plan, describing how they provide access for those with disabilities to programs, services and activities. MPOs that are a part of a public agency that has these responsibilities need to have a heightened awareness for these responsibilities and plans. However, all MPOs play an important role in ADA compliance by assisting agencies with sidewalk inventories, gap studies, etc. MPOs can also go a good deal further, but should at a minimum serve as a resource for information and technical assistance in local government compliance with ADA. {28 CFR 35.105; 28 CFR 35.150(d)}

Administrative Topics

LRTP Documentation/Final Board Approval: The date the MPO Board adopts the LRTP is the effective date of the plan. The contents of the product that the MPO adopts on that date includes at a minimum: 1) the current and projected demand of persons and goods; 2) existing and proposed facilities that serve transportation functions; 3) a description of performance measures and targets; 4) a system performance report; 5) operational and management strategies; 6) consideration of the results of the congestion management process; 7) assessment of capital investment and other strategies to preserve existing and future infrastructure; 8) transportation and transit enhancement activities; 9) description of proposed improvements in sufficient detail to develop cost estimates; 10) discussion of potential environmental mitigation strategies and areas to carry out the activities; 11) a cost feasible financial plan that demonstrates how the proposed projects can be implemented and includes system level operation and maintenance revenues and costs; and 12) pedestrian walkway and bicycle transportation facilities which are required to be considered, where appropriate, in conjunction with all new construction and reconstruction of transportation facilities, except where bicycle and pedestrian use are not permitted. FHWA and FTA expect that at the time the MPO Board adopts the LRTP, a

substantial amount of LRTP analysis and documentation will have been completed, and all final documentation will be available for distribution no later than 90 days after the plan's adoption. The Board and its advisory committees, as well as the public, should have periodically had opportunities to review and comment on products from interim tasks and reports that culminated into what is referred to as the final Plan. Finalizing the LRTP and its supporting documentation is the last activity in a lengthy process. All final documents are required to be made readily available for public review and to be made available electronically. The final document(s) should be posted online and available through the MPO office no later than 90 days after adoption date. The MPOs' schedules for this round of LRTP development are expected to allow ample time for the Board to adopt the final LRTP product no later than 5 years from the MPOs' adoption of the previous LRTP. These adoption dates have recently been confirmed with each MPO. {23 CFR 450.324 (a), (c), (f), (k)}

LRTP & STIP/TIP Consistency: The STIP and TIPs must be consistent with the relevant LRTPs as they are developed. FHWA and FTA staff will be checking for this consistency during the STIP approval process. The results of previous reviews indicate that emphasis is still needed to ensure that projects are accurately reflected in both the TIP and STIP and that these projects are flowing from and are found to be consistent with the MPO's LRTP. Additionally, when amendments to the STIP/TIP are made, the projects must also be consistent with the LRTP from which they are derived. When STIP/TIP amendments are received by FHWA and FTA, they will be reviewed for consistency with the applicable LRTP. Projects with inconsistencies between the STIP/TIP and the respective LRTP will not be approved for use of federal funds or federal action until the issue is addressed. {23 CFR 450.330; 23 CFR 450.218(b)}.

New Requirements

This section describes topics that may not currently be required by federal laws and rules to be addressed in LRTPs. As such, MPOs are not required to include these considerations in their current planning processes and plans. However, they will be required to be addressed for the next LRTP.

New Planning Factors: The MPO is required to address several planning factors as a part of its planning processes. The degree of consideration and analysis of the factors should be based on the scale and complexity of the area's issues and will vary depending on the unique conditions of the area. Efforts should be made to think through and carefully consider how to address each factor. There are two new planning factors that need to be considered in the next LRTPs: 1) improving the resiliency and reliability of the transportation system and reducing or mitigating stormwater impacts of surface transportation; and 2) enhancing travel and tourism. Florida has a strong history of proactively addressing these transportation areas. These experiences can be drawn upon to incorporate the new factors into the planning processes. {23 CFR 450.306(b)9, (b)(10), (c)}

Transportation Performance Management: As funding for transportation capacity projects becomes more limited, increasing emphasis will be placed on maximizing the efficiency and effectiveness of our current transportation system and the resources that build and maintain the system. As such, a performance-based approach to transportation decision making will be required for the FDOT and MPOs. As the MPOs and FDOT are aware, the performance measures required to be addressed in the LRTPs are documented in final rules that were published in the Federal Register on March 15, 2016 and January 18, 2017. The MPOs will set their targets

in accordance with the schedule established in these final rules. FDOT and the MPOs have flexibility as to the documentation and process used for setting the targets, as long as the targets are made publicly available once they are set. The next LRTPs (when updated or amended after May 27, 2018) will be required to describe the performance measures and the targets the MPO has selected for assessing the performance of the transportation system.

A system performance report will also be required to be included in the LRTPs. The report is a tool that evaluates and updates the condition of the transportation system in relation to the performance measures and targets. While guidance is still being developed, the report would include for each performance measure information such as: the target set; the baseline condition at the start of the evaluation cycle; the progress achieved in meeting the targets; and a trend-type comparison of progress with previous performance reports. Depending on the timing of the LRTP, the date of the target setting, and length of the evaluation cycle, the LRTPs initially amended/updated after May 27, 2018 may not have a full cycle of specific information to include. However, the LRTPs need to include the data that is available and discuss how the MPO plans to use the full information once it does become available. We recognize that these initial LRTPs will be developed during a transition period, and commit to working with the MPOs to ensure that the regulations are reasonably being addressed. {23 CFR 450.306(d)(4); 23 CFR 450.324(f)(3), (f)(4)}

For more TPM information and the tools tailored for Florida partners, please go to: https://www.fhwa.dot.gov/fldiv/tpm.cfm

Multimodal Feasibility: The transportation plan shall include both long-range and short-range strategies/actions that provide for the development of an integrated multimodal transportation system (including accessible pedestrian walkways and bicycle transportation facilities) to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand. {23 CFR 450.324}

Transit Asset Management: The MPO is required to set performance targets for each performance measure, per 23 CFR 450.306(d). Those performance targets must be established 180 days after the transit agency established their performance targets. Transit agencies are required to set their performance targets by January 1, 2017. If there are multiple asset classes offered in the metropolitan planning area, the MPO should set targets for each asset class. Planning for TAM/Roles and Responsibilities for MPOs and State DOTs can be found on the FTA website: https://cms.fta.dot.gov/sites/fta.dot.gov/files/planning-tam-fact-sheet.pdf

Emerging Issues

This section describes topics that may not currently be required by federal laws and rules to be addressed in LRTPs. As such, MPOs are not required to include these considerations in their current planning processes and plans. These issues are receiving considerable attention in national discussions. Each MPO has the discretion to determine whether to address these emerging topics in their LRTP at this time and the appropriate level of detail. Beginning to address these issues early on may potentially minimize the level of effort needed to achieve future compliance.

Mobility on Demand (MOD): Mobility on Demand (MOD) is an innovative, user-focused approach which leverages emerging mobility services, integrated transit networks and operations, real-time data, connected travelers, and cooperative Intelligent Transportation Systems (ITS) to allow for a more traveler-centric, transportation system- of-systems approach, providing improved mobility options to all travelers and users of the system in an efficient and safe manner. Automated vehicles (AV), now being called Automated Driving Systems (ADS) and Connected Vehicles (CV) are two components of the overall MOD model.

ADS (also known as self-driving, driverless, or robotic) are vehicles in which some aspect of vehicle control is automated by the car. For example, adaptive cruise control, where the vehicle automatically speeds up, slows down, or stops in response to other vehicle movements in the traffic stream is an automated vehicle function. Connectivity is an important input to realizing the full potential benefits and broad-scale implementation of automated vehicles. The preliminary five-part formal classification system for ADS is:

- Level 0: The human driver is in complete control of all functions of the car.
- Level 1: A single vehicle function is automated.
- Level 2: More than one function is automated at the same time (e.g., steering and acceleration), but the driver must remain constantly attentive.
- Level 3: The driving functions are sufficiently automated that the driver can safely engage in other activities.
- Level 4: The car can drive itself without a human driver

CV includes technology that will enable cars, buses, trucks, trains, roads and other infrastructure, and our smartphones and other devices to "talk" to one another. Cars on the highway, for example, would use short-range radio signals to communicate with each other so every vehicle on the road would be aware of where other nearby vehicles are. Drivers would receive notifications and alerts of dangerous situations, such as someone about to run a red light as they're nearing an intersection or an oncoming car, out of sight beyond a curve, swerving into their lane to avoid an object on the road.

Rapid advances in technology mean that these types of systems may be coming on line during the horizon of the next LRTPs. While these technologies when fully implemented will provide more opportunities to operate the transportation system better, the infrastructure needed to do so and the transition time for implementation is an area that the MPO can start to address in this next round of LRTP updates.

Resources for additional information:
Mobility on Demand: https://www.its.dot.gov/factsheets/pdf/MobilityonDemand.pdf
Autonomous Vehicles: https://www.its.dot.gov/research_areas/pdf/WhitePaper_automation.pdf
Connected Vehicles: https://www.its.dot.gov/cv_basics/index.htm
Transportation Planning Capacity Building Connected Vehicle Focus Area:
https://planning.dot.gov/focus_connectedVehicle.asp

Proactive Improvements

This section describes topics that are not currently required by federal laws and rules to be addressed in LRTPs nor are they required by the May 27, 2016 regulation changes. As such, MPOs are not required to include these considerations in their current planning processes and plans. These areas are intended to be a proactive change in the LRTPs to help Florida continue to make positive strides in long range planning.

New Consultation: There are two new types of agencies that the MPO should consult with when developing the LRTPs: agencies that are responsible for tourism and those that are responsible for natural disaster risk reduction. These consultations are a natural evolution of implementing the new planning factors for which Florida has experience in doing. {23 CFR 450.316(b)}

Summary of Public Involvement Strategies: Seeking out and considering the needs of traditionally underserved populations is a key part of any public involvement process. When the MPO carries out stakeholder involvement, they may use a variety of strategies. These strategies ultimately demonstrate that their planning process is consistent with Title VI and other federal anti-discrimination provisions in the development of the LRTP. In order to clearly demonstrate this consistency, the MPOs should summarize the outreach information. This information should be derived from the MPO's public involvement plan elements. The public involvement summary should be supported by more detailed information, such as the specific strategies used, feedback received and feedback responses, findings, etc. The detailed information should then be referenced and included in the form of a technical memorandum or report that can be appended to the LRTP, or included in a separate, standalone document that is also available for public review in support of the LRTP. {23 CFR 450.316(a)(1)(vii)}

Impact Analysis/Data Validation: In accordance with Title VI, MPOs need to have and document a proactive, effective public involvement process that includes outreach to low income, minorities and traditionally underserved populations, as well as all other citizens of the metropolitan area, throughout the transportation planning process. Using this process, the LRTP needs to document the overall transportation needs of the metropolitan area and be able to demonstrate how public feedback and input helped shape the resulting plan. Where some MPOs struggle in using data to assess likely impacts, other MPOs attempt to use data to assess the needs. Some look at a dollar spread among minority/non-minority areas to determine equity. This approach is probably not the best method to use, since higher dollar amounts might indicate capacity projects when the community needs more pedestrian connectivity, for example. We suggest using the data tools found at https://www.fhwa.dot.gov/environment/environmental_justice/resources/data_tools/. Additionally, as time passes it becomes more important to validate the 2010 census data being used. School Boards, emergency service agencies, tax rolls and staff knowledge are all good sources to ensure data quality. {23 CFR 450.316(a)(1)(vii); 23 CFR 420.324(e)}

FDOT Revenue Forecast: To help stakeholders understand the financial information and analysis that goes into identifying the revenues for the MPO, we recommend the MPO include FDOT's Revenue Forecast in the appendices that support the LRTP. {23 CFR 450.324(f)(11)(ii)}

Sustainability and Livability in Context: We encourage the MPO to implement strategies that contribute to comprehensive livability programs and advance projects with multimodal connectivity. MPO policies and practices that support an integrated surface transportation system for all users that is efficient, equitable, safe, and environmentally sustainable will improve transportation choices and connectivity for all users especially those walking and bicycling. Building partnerships with traditional and nontraditional stakeholders will facilitate the development and implementation of transportation projects that improve integration, connectivity, accessibility, safety and convenience for all users. The MPOs are encouraged to identify and suggest contextual solutions for appropriate transportation corridors within their area and utilize the flexibilities provided in the federal funding programs to improve the transportation network for all users. {23 CFR 450.306(b)}

Scenario Planning: The new planning requirements describe using multiple scenarios for consideration by the MPO in the development of the LRTP. If the MPO chooses to develop these scenarios, they are encouraged to consider a number of factors including potential regional investment strategies, assumed distribution of population and employment, a scenario that maintains baseline conditions for identified performance measures, a scenario that improves the baseline conditions, revenue constrained scenarios, and include estimated costs and potential revenue available to support each scenario. {23 CFR 450.324(i)}