



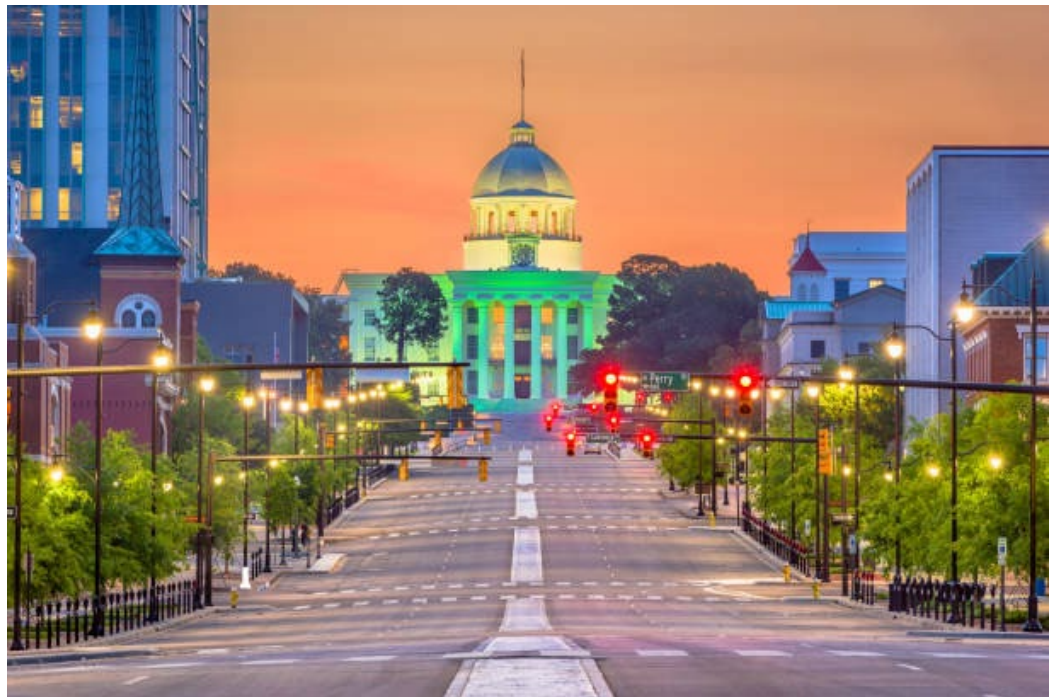
U.S. Department  
of Transportation

# Transportation Management Area Planning Certification Review

Federal Highway  
Administration

Federal Transit  
Administration

## Montgomery, Alabama Transportation Management Area



**August 15, 2024**

**FINAL Summary Report**





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## 1.0 EXECUTIVE SUMMARY

Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) are required to jointly review and evaluate the transportation planning process for each urbanized area over 200,000 in population at least every four years to determine if the process meets the Federal planning requirements.

On June 11th, 12th, and 13th, of 2024, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) in partnership with Alabama Department of Transportation (ALDOT) conducted the site visit portion for the Certification Review of the transportation planning process for the Montgomery, Alabama Transportation Management Area (TMA).

### 1.1 Previous Findings and Disposition

The previous Certification Review for the Montgomery urbanized area was conducted in 2020.

In the 2020 Certification Review Report, the Federal Review Team noted no corrective actions, one (1) noteworthy practice, and identified six (6) recommendations to improve the current planning process of the Montgomery MPO (see Appendix B).

Finding	Action	Corrective Actions/ Recommendations	Disposition
Membership change in the MPO Policy Board is infrequent and is only adjusted when there is a change in local elected officials. The last recorded membership adjustment was in 2015.	Commendation	The Federal Review Team commends the Montgomery MPO for their working relationship with their local Board Members and the community at large.	N/A
The Montgomery MPO has two active agreements. The first agreement is between the MPO and its membership governments and Alabama Department of Transportation (ALDOT) regarding the “3-C Planning Process.” The second agreement is between the M and ACRT regarding usage of FTA Special Program funds.	Recommendation	The MPO should document the process on how the transit representatives for both the M – Montgomery Area Transit System and ACRT were selected and whether or not the MPO member agreed to the selection. No update to the MPO bylaws has occurred since the last Certification Review.	The MPO should implement the recommendation by the 2024 TMA Certification Review.



There was a noticeable amount of 3-year carryover funds listed in the current UPWP.	Recommendation	The Federal Review Team recommends the following for the MPO to include in the next UPWP update: To review the MPO’s COOP and update it for emergency situations.	The MPO should implement the recommendation by the adoption of the 2021-2022 UPWP.
The Montgomery MPO completed the Walk Bike River Region Plan in 2018.	Recommendation	The Walk Bike River Region Plan in 2018 will be incorporated into the 2045 LRTP with capacity and maintenance projects in the 2045 LRTP reviewed for designation as a pedestrian or bicycle route.	The MPO should implement the recommendation to adopt the 2045 Long Range Transportation Plan, effective on year from the date of the Certification by August 24, 2021.
The Montgomery Area MPO Congestion Management Plan (CMP) was adopted in 2014.	Recommendation	The Federal Review Team recommends the MOP to consider incorporating CMP strategies that are low cost and innovative on local and ALDOT projects.	The MPO should implement the recommendation by the next TMA Certification Review.
The Montgomery Area MPO Public Participation Plan (PPP) was adopted in February 2014.	Recommendation	The MPO plans to update the Public Participation Plan as well as evaluate the current effectiveness of their efforts soon, and advancements in their public participation techniques have already begun.	The MPO should implement the recommendation by the next TMA Certification Review.
The MPO does not have any active or previously unresolved Title VI, Americans with Disabilities Act (ADA), or DBE complaints.	Recommendation	The Federal Review Team recommends that the MPO list a full-time ADA coordinator on the MPO website, although a staff member carries this duty, this contact information has not yet been made available to the public at the MPO level.	The MPO should implement the recommendation by the next TMA Certification Review.



## 1.2 Summary of Current Findings

The current review found that the metropolitan transportation planning process conducted in the Montgomery urbanized area meets (with corrective actions) Federal planning requirements.

As a result of this review, FHWA and FTA are certifying the transportation planning process conducted by Alabama Department of Transportation (ALDOT), Montgomery Metropolitan Planning Organization (MPO) and The M Transit subject to addressing corrective actions. There are also recommendations in this report that warrant close attention and follow-up.

The public involvement meeting for the certification review was held in the evening on, June 11th, 2024. The meeting was advertised through the MPO online. Members of the public were given 30 days from the date of the public meeting to mail, fax or email their comments. All written and verbal comments received during the public involvement meeting were provided a proper and timely response.

Details of the certification findings for each of the below items are contained in this report.

Review Area	Finding	Action	Corrective Actions/ Recommendations/ Commendations	Resolution Due Date
MPO Structure and Agreements 23 U.S.C. 134(d) 23 CFR 450.314(a)	There is currently no voting transit representative on the Policy Board of the MPO. No cooperative agreement between the MPO and Transit Provider was provided by the MPO, nor could one be found on the MPO's website.	Corrective Action	The Montgomery MPO must reassess how the policy board votes to ensure equal transit representation on the policy board; Additionally, MPO will need to outline the member framework specifically for addressing 23 CFR 450.310 (d)(3)(iii) requirement.	End of 1st quarter of CY 2025 (March 2025)
		Recommendation	The Montgomery MPO should update its website accordingly to ensure that it is user-friendly and that all transportation related products such as the MPO Policy Board Bylaws, CAC Bylaws, and TAC Bylaws with voting members (such as The M Transit) are current and displayed in an easy and accessible manner for the public and oversight agencies.	End of 1st quarter of CY 2025 (March 2025)



<p>Unified Planning Work Program          23 CFR 450.308</p>	<p>The UPWP does not contain an Indirect Cost Allocation Plan (ICAP) or Certificate of Indirect Costs.</p>	<p>Corrective Action</p>	<p>The UPWP must contain an Indirect Cost Allocation Plan (ICAP) and/or Certificate of Indirect Costs, if the MPO uses federal funds for reimbursement of indirect costs. If the MPO does not request reimbursement for indirect costs, there must be a statement in the UPWP indicating that there are no federal funds used for indirect costs.</p>	<p>The next UPWP update (FY 2025).</p>
<p>Metropolitan Transportation Plan (MTP)          23 U.S.C. 134(c), (h)&amp;(i)          23 CFR 450.324</p>	<p>The MTP System Performance Report is a list of targets for the state.</p>	<p>Corrective Action</p>	<p>The System Performance Report must include a thorough description of the measures and actual performance data, not just established targets. Historical trends and visualization are extremely helpful to tell the story of how the state is performing within the Montgomery MPO region. The Montgomery MPO may also include local data to track metropolitan planning area performance. Transit performance data must be included in the report as well.</p>	<p>The next MTP update (2050 horizon).</p>
<p>Transit Planning          49 U.S.C. 5303          23 U.S.C. 134          23 CFR 450.314</p>	<p>The Montgomery MPO does not have all the required elements for public involvement, specifically: explanation of how the plan was developed in consultation with other interested parties; description of the visualization techniques utilized in the LRTP and TIP; The PPP has no descriptive or quantifiable strategies for seeking out and considering the needs of the traditionally underserved, minorities, and those with low incomes; nor does the document fully discuss strategies for periodically reviewing the effectiveness of the PPP.</p>	<p>Corrective Action</p>	<p>The Montgomery MPO must provide a written agreement between the MPO, the State(s), and the providers of public transportation that documents 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(s), and the providers of public transportation serving the MPA.</p>	<p>March 2025.</p>
		<p>Corrective Action</p>	<p>The Montgomery MPO must provide descriptive and quantifiable documentation of the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services.</p>	





Transportation Improvement Program 23 U.S.C. 134(c)(h)& (j) 23 CFR 450.326	The TIP does not include any discussion of how programmed projects are anticipated to help achieve performance targets.	Corrective Action	The Montgomery MPO must include narrative and anticipated effect of the TIP toward achieving the performance targets identified in the MTP, linking investment priorities to those performance targets.	The next TIP update in FY 2027.
	The TIP does not include how projects are prioritized for implementation.	Corrective Action	The Montgomery MPO must monitor progress in implementing the TIP by identifying the criteria and process for prioritizing projects (including multimodal trade-offs) for inclusion and any changes in priorities from previous TIPs.	The next TIP update in FY 2027.
Public Participation 23 U.S.C. 134(i)(6) 23 CFR 450.316 & 450.326(b)	The Montgomery MPOs Public Participation Plan (PPP) lacks descriptive and explicit procedures, strategies, and desired outcomes for public input. The Montgomery MPO failed to document and provide several documents and summaries on the Montgomery MPO ( <a href="http://www.montgomerympo.org">www.montgomerympo.org</a> ) website. It was also noted that the Montgomery MPO lacked documentation of public comment and responses to the MTP and TIP in appendices or narrative of the documents. The MPO must periodically review the effectiveness of the procedures and strategic outreach to LEP Populations, EJ Populations and Title VI Communities. However, it is unclear on how the engagement received from public input, led to MTP/TIP planning decisions, and the effectiveness of that engagement.	Corrective Action	The PPP must contain timelines for involvement, outreach methodologies, and methods for contacting traditionally underserved populations. The PPP must contain specific outreach methods for the MPO's main planning documents (MTP, TIP, UPWP, etc.). The Montgomery MPO must include in its updated PPP descriptive or quantifiable strategies for seeking out and considering the needs of the traditionally underserved, minorities, and those with low incomes. The MPO must fully discuss and document strategies for periodically reviewing the effectiveness of the PPP, specifically with the explanation of (a) how the plan was developed in consultation with other interested parties; (b) description of the visualization techniques utilized in the LRTP and TIP; and (c) how this information is used to influence decision making.	One (1) year from the date of this review. (August 2025)
		Recommendation	The Montgomery MPO should update its PPP to incorporate descriptive and quantifiable strategies to seek out communities of concern.	



<p>Civil Rights  Title VI Civil Rights Act,  23 U.S.C. 324,  Age  Discrimination Act, Sec. 504  Rehabilitation Act,  Americans with Disabilities Act</p>	<p>The Montgomery MPO displayed no evidence to suggest it seeks out and considers the needs, values, and concerns specifically from groups that are traditionally underserved and underrepresented by existing transportation systems who may face challenges accessing employment and other services. The Montgomery MPO also lacked evidence that it reviewed the effectiveness of procedures and strategies contained in its public participation plan to ensure open and full participation in the MPO’s planning process by EJ communities.</p>	<p>Corrective Action</p>	<p>The Montgomery MPO must perform a formal evaluation of their public involvement process per the requirements of the periodic assessment (23 CFR 450.316(b)).</p>	<p>March 2025.</p>
		<p>Corrective Action</p>	<p>The Montgomery MPO must sign the standard USDOT nondiscrimination assurances. Also, the MPO must have Internal Controls in place to ensure nondiscrimination, including collecting demographic data and analyzing that data to determine the distributional effects of the transportation investments identified in the TIP.</p>	<p>Immediately, upon receiving this report.</p>
		<p>Recommendation</p>	<p>The Montgomery MPO should refer to USDOT’s Promising Practices for Meaningful Public Involvement in the Transportation Decision-Making Guide to improve its public involvement process. They should actively seek out participation from the underserved communities and document their efforts to do so.</p>	<p>August 2025.</p>
		<p>Recommendation</p>	<p>All ADA transition plans, from various jurisdictions, should be updated as the most current one is from 2020, the oldest being from 2009. Ensure all ADA transition plans contain the required elements. Also, ensure public outreach efforts extend to disabled groups, representatives, communities, etc. It is advised that a disabled person or representative be placed on the technical committee. Ensure the website reflects the most current documentation and working links for civil rights required items.</p>	<p>August 2025.</p>



<p>Consultation and Coordination  23 U.S.C. 134(g) &amp; (i)  23 CFR 450.316, 23 CFR 450.324(g)</p>	<p>The federal review team could not locate any consultation procedures, contacts, or received feedback from federal, state, or local resource agencies. ALDOT has provided documentation and organizes the process for environmental consultation with federal, state, and local resource agencies as required by 23 CFR 450.324(g) for the MPOs when concerning the MTPs.</p>	<p>Recommendation</p>	<p>The MPO should include the consultation efforts of ALDOT in the appendix of the MTP.</p>	<p>The next MTP update (2050 horizon).</p>
<p>List of Obligated Projects  23 U.S.C. 134(j)(7)  23 CFR 450.334</p>	<p>FY2023 Annual List of Obligated Projects report was included in the FY2024-2027 TIP (pages 123-126). The MPO's process satisfies federal requirements.</p>	<p>Recommendation</p>	<p>A standalone document posted on the MPOs website with an excellent written narrative, summary financial investment information, the purpose of the report, and a clear, easy to understand project list with all required specific information would be useful when being transparent to the public.</p>	<p>The next project list update, FY 2025.</p>
<p>Environmental Mitigation, Planning Environmental Linkage  23 U.S.C. 134(i)(2)(D)  23 CFR 450.324(f)(10)  23 U.S.C. 168 Appx. A 23 CFR Part 450</p>	<p>The environmental mitigation section is contained in Sections 3.8 and 3.9 of the MTP. The ALDOT contacts various state resource agencies for any potential environmental conflicts. The MPO does not currently have any active PEL studies.</p>	<p>Recommendation</p>	<p>Mapping the potential environmental conflict areas with the projects proposed in the MTP may provide project sponsors with important information when delivering projects, which in terms can reduce or avoid delays (especially when going through the NEPA process) in project delivery.</p>	<p>Before FY 2027 Certification Review.</p>
<p>Transportation Safety  23 U.S.C. 134(h)(1)(B)  23 CFR 450.306(a)(2)  23 CFR 450.306(d)  23 CFR 450.324(h)</p>	<p>The MPO does not include safety considerations in long-range planning through the Metropolitan Transportation Plan (MTP), Unified Planning Work Program (UPWP), and Transportation Improvement Program (TIP). The MPO effectively publishes crash data in their long-range transportation plan (LRTP).</p>	<p>Recommendation</p>	<p>The MTP could incorporate a location-based safety analysis to prioritize the implementation of proven safety countermeasures based on crash history. Additionally, the MTP would benefit from a systemic safety analysis and a discussion on countermeasures.</p>	<p>Before FY 2027 certification review.</p>

Details of the certification findings for each of the above items are contained in this report.



## 2.0 INTRODUCTION

### 2.1 Background

Pursuant to 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), 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. A TMA is an urbanized area, as defined by the U.S. Census Bureau, with a population of over 200,000. After the 2010 Census, the Secretary of Transportation designated 183 TMAs – 179 urbanized areas over 200,000 in population plus four urbanized areas that received special designation. In general, the reviews consist of three primary activities: a site visit, a review of planning products (in advance of and during the site visit), and preparation of a Certification Review Report that summarizes the review and offers findings. The reviews focus on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the MPO(s), the State DOT(s), and public transportation operator(s) in the conduct of the metropolitan transportation planning process. Joint FHWA/FTA Certification Review guidelines provide agency field reviewers with latitude and flexibility to tailor the review to reflect regional issues and needs. Consequently, the scope and depth of the Certification Review reports will vary significantly.

The Certification Review process is only one of several methods used to assess the quality of a regional metropolitan transportation planning process, compliance with applicable statutes and regulations, and the level and type of technical assistance needed to enhance the effectiveness of the planning process. Other activities provide opportunities for this type of review and comment, including Unified Planning Work Program (UPWP) approval, the Metropolitan Transportation Plan (MTP), metropolitan and statewide Transportation Improvement Program (TIP) findings, air-quality (AQ) conformity determinations (in nonattainment and maintenance areas), as well as a range of other formal and less formal contact provide both FHWA/FTA an opportunity to comment on the planning process. The results of these other processes are considered in the Certification Review process.

While the Certification Review report itself may not fully document those many intermediate and ongoing checkpoints, the “findings” of Certification Review are, in fact, based upon the cumulative knowledge gained through the formal certification review effort and other formal and informal experiences.

The review process is individually tailored to focus on topics of significance in each metropolitan planning area. Federal reviewers prepare Certification Reports to document the results of the review process. The reports and final actions are the joint responsibility of the appropriate FHWA and FTA field offices, and their content will vary to reflect the planning process reviewed, whether or not they relate explicitly to formal “findings” of the review.



To encourage public understanding and input, FHWA/FTA will continue to improve the clarity of the Certification Review reports.

## **2.2 Purpose and Objective**

Since the enactment of the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, the FHWA and FTA, are required to jointly review and evaluate the transportation planning process in all urbanized areas over 200,000 population to determine if the process meets the Federal planning requirements in 23 U.S.C. 134, 40 U.S.C. 5303, and 23 CFR 450. The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), extended the minimum allowable frequency of certification reviews to at least every four years.

The Montgomery Metropolitan Planning Organization (MPO) is the designated MPO for the Montgomery, Alabama urbanized area. Alabama Department of Transportation (ALDOT) is the responsible State agency, and The M Transit is the responsible public transportation operator. Current membership of the Montgomery MPO consists of elected officials and citizens from the political jurisdictions in the Montgomery Metropolitan Planning Area. The study area includes all of jurisdictions within the Autauga, Elmore, and Montgomery Counties.

Certification of the planning process is a prerequisite to the approval of Federal funding for transportation projects in such areas. The certification review is also an opportunity to provide assistance on new programs and to enhance the ability of the metropolitan transportation planning process to provide decision makers with the knowledge they need to make well-informed capital and operating investment decisions.

## **3.0 SCOPE AND METHODOLOGY**

### **3.1 Review Process**

A summary of the status of findings from the last review is provided in Section 1.0.

This report details the complete review process for the Montgomery TMA Certification Review, which consisted of an initial desk review, formal site visit, and a public involvement opportunity, with the final report to be issued.

Participants in this review included representatives of FHWA – Alabama Division Office, FHWA – Headquarters, FTA Region IV, Alabama Department of Transportation (ALDOT), The M Transit, and Montgomery MPO staff. A full list of participants from this review is included in Appendix A.



A desk audit of current documents and correspondence was completed prior to the site visit. In addition to the formal review, routine oversight mechanisms provide a major source of information upon which to base the certification findings.

The certification review covers the transportation planning process conducted cooperatively by the MPO, State, and public transportation operators. Background information, current status, key findings, and recommendations are summarized in the body of the report for the following subject areas selected by FHWA and FTA staff for on-site review:

- Metropolitan Planning Area Boundaries
- MPO Structure and Agreements
- Unified Planning Work Program
- Metropolitan Transportation Plan (MTP)
- Transit Planning
- Transportation Improvement Program (TIP)
- Public Participation
- Civil Rights (Title VI, EJ, LEP, ADA)
- Consultation and Coordination
- List of Obligated Projects
- Freight Planning
- Environmental Mitigation/Planning Environmental Linkage
- Transportation Safety
- Transportation Security Planning
- Nonmotorized Planning/Livability
- Integration of Land Use and Transportation
- Travel Demand Forecasting
- Air Quality
- Congestion Management Process / Management and Operations



## 3.2 Documents Reviewed

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

- Montgomery Congestion Management Process (CMP) 2023-2027
- Montgomery MPO TIP FY 2024-2027
- Montgomery MPO 2013 Public Participation Plan, Adopted 2014
- Montgomery MPO 3-C Master Agreement, 2015
- FY 2024 Unified Planning Work Program for the Montgomery MPO
- Montgomery MPO Year 2045 Long Range Transportation Plan, Jan 2022
- Montgomery Regional Freight Plan, Sept 2020
- Walk Bike River Region, Feb 2019
- Annual Listing of Federally Obligated Projects Federal Fiscal Years 2022 & 2023
- Montgomery MPO CAC Bylaws
- 2022 Montgomery MPO Performance Measures Executed Agreement
- The M Transit Development Plan Update 2023-2027
- Resolution No. 76-2017 FAST ACT Updated Authorizing Resolution
- FY 2022 MPO Title VI Review and Evaluation Form to ALDOT
- FY 2023 MPO Title VI Review and Evaluation Form to ALDOT
- Montgomery MPO webpage



## 4.0 PROGRAM REVIEW

### 4.1 Metropolitan Planning Area Boundaries

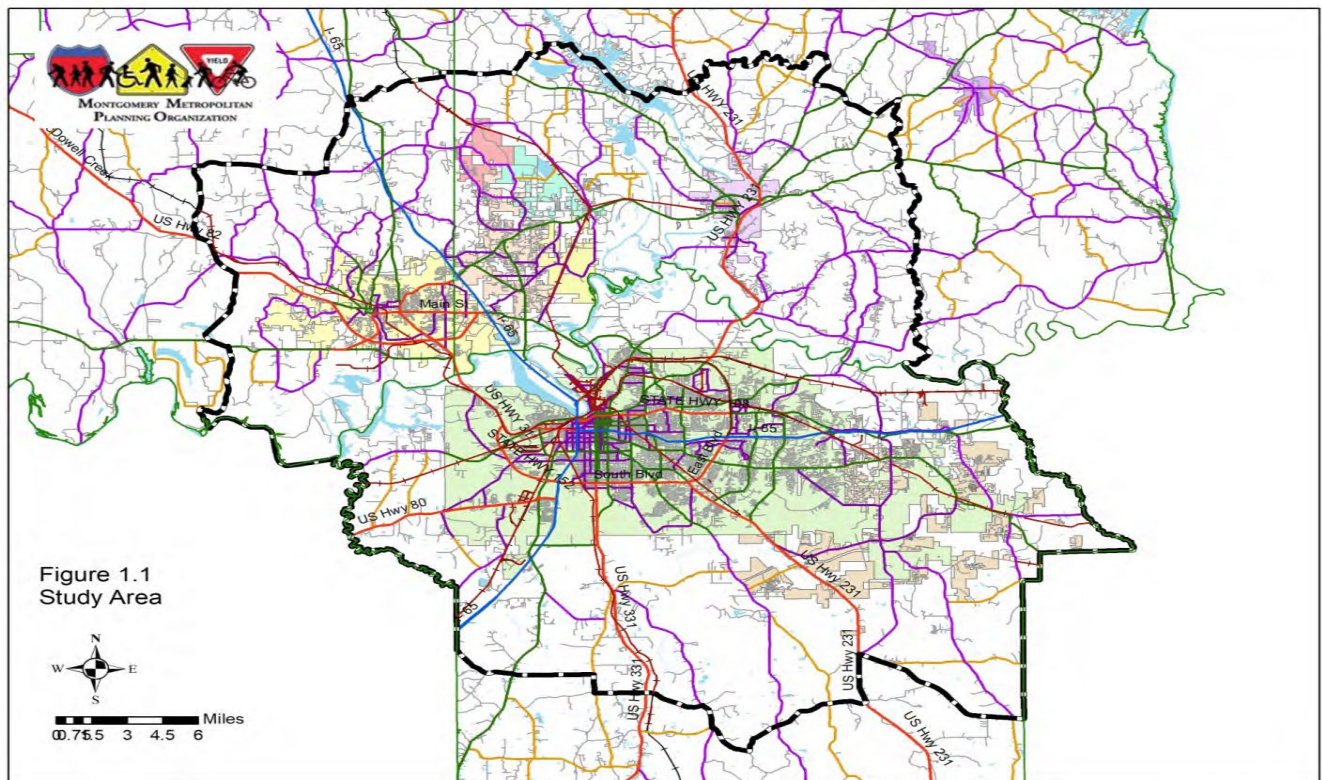
#### 4.1.1 Regulatory Basis

23 U.S.C. 134(e) and 23 CFR 450.312(a) state the boundaries of a Metropolitan Planning Area (MPA) shall be determined by agreement between the MPO and the Governor. At a minimum, the MPA boundaries shall encompass the entire existing urbanized area (as defined by the Bureau of the Census) plus the contiguous area expected to become urbanized within a 20-year forecast period for the MTP.

#### 4.1.2 Current Status

MPO Official Name: Montgomery Metropolitan Planning Organization (MPO)

MPO Area Boundaries:



Population Served (2020 census): 321,907





### 4.1.3 Findings

The Montgomery MPO is compliant with the requirements of 23 CFR 450.312(a). The forecasted 20-year horizon for the planning area is reasonable and appropriate. Maps of the MPO boundaries are available on the MPO website. MPA Boundaries were found to be a low-risk topic for the Montgomery MPO.

The Montgomery MPO indicated that they coordinated with ALDOT to ensure the correct adjustment of urban area boundaries. Those GIS files had been transmitted to FHWA HQ for technical review and concurrence. The adjusted urban area boundaries did not affect the MPOs MPA boundaries nor the MPOs designation.

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** None.

**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** N/A

## 4.2 MPO Structure and Agreements

### 4.2.1 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.

### 4.2.2 Current Status

The Montgomery Area MPO is the lead agency responsible for determining overall policy affecting long-range and short-range transportation programs and plans for the TMA. The agreement legally delineates the concerned governmental entities, defines the duties of each entity, and outlines the organization structure of the MPO. The first agreement of the Montgomery MPO was executed in 1973. The most recent agreement was executed in 1995. The 1995 agreement is between the City of Montgomery, Montgomery County, City of Prattville,



Autauga County, City of Wetumpka, City of Millbrook, Town of Coosada, Elmore County, Alabama Department of Transportation, and Central Alabama Regional Planning and Development Commission (non-voting status).

The MPO Policy Board is composed of seventeen (17) voting members and eight (8) non-voting members.

Voting membership consists of (each member has one vote):

- Montgomery County - 2 members
- City of Montgomery - 5 members
- Autauga County - 1 member
- Elmore County - 1 member
- City of Prattville - 1 member
- City of Millbrook - 1 member
- City of Wetumpka - 1 member
- Town of Coosada - 1 member
- Town of Deatsville - 1 member
- Town of Elmore - 1 member
- Town of Pike Road - 1 member
- Alabama Department of Transportation (ALDOT) Southeast Region – 1 member

Non-voting membership consists of:

- ALDOT - 1 member
- Montgomery Area Transit - 1 member
- Autauga County Rural Transit - 1 member
- City of Montgomery - 2 members
- Central Alabama Regional Planning and Development Commission - 1 member
- FHWA - 1 member
- FTA - 1 member

The MPO Policy Board meets approximately six times a year. The primary standing committees associated with the transportation planning process in the Montgomery MPO include a Technical Coordinating Committee (TCC) and a Citizens Advisory Committee (CAC). Prior to making decisions, the MPO receives recommendations from the TCC and CAC.

Membership change in the MPO Policy Board is infrequent and is only adjusted when there is a change in local elected officials.



The Montgomery MPO has an active agreement. This agreement is between the MPO and its membership governments and Alabama Department of Transportation (ALDOT) regarding the “3C Planning Process”.

#### **4.2.3 Findings**

The Montgomery MPO transit activities do not fully meet the requirements of the MPO Organization Structure outlined in 23 CFR 450.310 (d)(3)(iii). The Montgomery MPO’s board structure of voting and non-voting members is unclear. The MPO indicated that the Transit representative is a non-voting member of the MPO policy board. The current structure does not give the Transit representative equal representation regarding policy decisions impacting Transit. The documents that the MPO presented do not provide clarity on the decision-making process of the policy board in the transportation planning process, specifically transit.

**Commendation:** None.

**Corrective Action:** The Montgomery MPO must reassess how the policy board votes to ensure equal transit representation on the policy board; Additionally, MPO will need to outline the member framework specifically for addressing 23 CFR 450.310 (d)(3)(iii) requirement.

**Recommendations:** The Montgomery MPO should update its website accordingly to ensure that it is user-friendly and that all transportation related products such as the MPO Policy Board Bylaws, CAC Bylaws, and TAC Bylaws with voting members (such as The M Transit) are current and displayed in an easy and accessible manner for the public and oversight agencies.

**Schedule for Process Improvement:** End of 1<sup>st</sup> quarter of CY 2025 (March 2025).

**Proposed FHWA/FTA Technical Assistance:** FHWA/FTA will work with the Montgomery MPO to provide guidance on ensuring fair and equal voting in the transportation planning process.

### **4.3 Unified Planning Work Program**

#### **4.3.1 Regulatory Basis**

23 CFR 450.308 sets the requirement that planning activities performed under Titles 23 and 49 U.S.C. be documented in a Unified Planning Work Program (UPWP). The MPO, in cooperation with the State and public transportation operator, shall develop a UPWP that includes a discussion of the planning priorities facing the MPA and the work proposed for the next one- or two-year period by major activity and task in sufficient detail to indicate the agency that will



perform the work, the schedule for completing the work, the resulting products, the proposed funding, and sources of funds.

#### **4.3.2 Current Status**

The Montgomery MPO develops the Unified Planning Work Program (UPWP) annually. The FY2024 UPWP was adopted by the Montgomery MPO Policy Board on September 28, 2023. The initial draft of the UPWP was developed by the MPO staff in coordination with the local transit agency, ALDOT and other planning partners for review. The draft UPWP was included as an agenda item at the MPO's committee meetings to solicit comments from members and the public. The UPWP was posted on the MPO's website for 7 days of review and comment.

The UPWP describes the federally assisted transportation planning work by Montgomery MPO, ALDOT, local governments and others, as well as other planning studies in the region, as part of the overall Montgomery MPO effort. It documents the two primary sources of Federal planning funds: FHWA's Metropolitan Planning (PL) funds and FTA's Section 5303 Metropolitan Planning Program funds. The Montgomery MPO documents the Increasing Safe and Accessible Transportation Options as an activity within the Bicycle and Pedestrian task which contains sufficient description of the costs and activities the MPO plans to undertake.

#### **4.3.3 Findings**

The Federal Review Team finds the Montgomery MPO is non-compliant with the requirements of 23 CFR 450.308(f) and 23 CFR 420.113(b). There is no Indirect Cost Allocation Plan and no Certificate of Indirect Costs. This is required if the MPO seeks reimbursement for indirect costs.

The current Fiscal Year (FY) 2024 UPWP contains transportation planning activities listed with sufficient descriptive data and a summary financial table which is compliant. The Montgomery MPO demonstrates a continuous planning process by forecasting upcoming planning milestones and deliverables in a table in the UPWP.

**Commendation:** None.

**Corrective Action:** The UPWP must contain an Indirect Cost Allocation Plan (ICAP) and/or Certificate of Indirect Costs, if the MPO uses federal funds for reimbursement of indirect costs. If the MPO does not request reimbursement for indirect costs, there must be a statement in the UPWP indicating that there are no federal funds used for indirect costs.

**Recommendations:** None.

**Schedule for Process Improvement:** FY 2025 UPWP (September 2024).



**Proposed FHWA/FTA Technical Assistance:** FHWA and FTA can provide technical assistance or an example ICAP and/or Certificate of Indirect Costs to the MPO upon request. The assigned FHWA Planner will assist the Montgomery MPO staff upon request in creating an ICAP and/or certificate of indirect costs.

## 4.4 Metropolitan Transportation Plan

### 4.4.1 Regulatory Basis

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

The MTP is required to provide a continuing, cooperative, and comprehensive multimodal transportation planning process. The plan needs to consider all applicable issues related to the transportation systems development, land use, employment, economic development, natural environment, and housing and community development.

23 CFR 450.324(c) requires the MPO to review and update the MTP at least every four years in air quality nonattainment and maintenance areas and at least every 5 years in attainment areas to reflect current and forecasted transportation, population, land use, employment, congestion, and economic conditions and trends.

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

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



#### 4.4.2 Current Status

The Year 2040 LRTP was adopted by Montgomery MPO on September 17, 2015. On October 14, 2021, the Montgomery MPO sent correspondence to ALDOT requesting an extension to complete and adopt Year 2045 due to difficulties in completing data collection due to COVID-19 global pandemic.

On January 20th, 2022, the Montgomery MPO Policy Board adopted the current Montgomery MPO 2045 Long-Range Transportation Plan, with a planning horizon of 25 years. The current plan is valid until January 20th, 2027. The plan is developed with a 3-C process, considers all modes of transportation, and considers land use, employment, economic, environment, and housing implications of the plan.

The Montgomery MPO 2045 Long-Range Transportation Plan contains the following information:

- Projected transportation demand (2045 LRTP Chapter 3, Section 3.11 Transportation Demand Management)
- Existing and proposed transportation facilities (2045 LRTP Chapter 4 Transportation System Overview)
- Operational and management strategies (2045 LRTP Chapter 8, Section 8.2.2 Financially Constrained Maintenance and Operations (MO) Projects)
- Congestion management process (Separate document, Montgomery CMP 2023-2027)
- Capital investment and strategies to preserve transportation infrastructure and provide for multimodal capacity (2045 LRTP Chapter 4 Transportation System Overview)
- Design concept and design scope descriptions of proposed transportation facilities (2045 LRTP Chapter 4 Transportation System Overview)
- Potential environmental mitigation activities (2045 LRTP Chapter, Section 3.9 Environmental Mitigation and Climate Change)
- Pedestrian walkway and bicycle transportation facilities (Separate document, Walk Bike River Region 2019)
- Transportation and transit enhancements (2045 LRTP Chapter, Section 4.4 Transit)
- A financial plan (2045 LRTP, Chapter 8)

The 2045 LRTP Financial Plan does not contain inflation factor(s) to show costs in “year of expenditure” dollars. The 2045 LRTP Financial Plan contains no project level costs. Additionally, the various funding tables show aggregate levels for ‘highway’ and ‘transit’ projects – even the various FHWA funding programs were combined.

The 2045 LRTP, also, did not contain performance measures and targets nor narrative stating how the MPO will meet performance measures and targets throughout this 25 year plan.



However, there was additional discussion at the On-Site Review regarding the approach that Montgomery MPO should consider for its next 2050 LRTP. One of the key discussion points was the viability of monitoring projects after implementation to assess whether the predicted benefit or burden from the previous analysis has actually occurred.

#### **4.4.3 Findings**

The Federal Review Team finds the current Metropolitan Transportation Plan (Montgomery MPO 2045 Long Range Transportation Plan) does not meet the requirements of 23 CFR 450.324(f)(4) regarding the national FHWA/FTA Performance Measures (and associated targets) and how the Montgomery MPO region has been addressing them through the MTP and TIP.

23 CFR 450.324(f)(3) requires that the MTP shall contain at a minimum a description of the performance measures and performance targets used in assessing the performance of the transportation system in accordance with subsection 450.306(d). The MTP shall contain at a minimum a system performance report and subsequent updates evaluating the condition and performance of the transportation system with respect to the performance targets described in subsection 450.306(d), including (i) progress achieved in meeting the performance targets and, for (ii) MPOs that elect to develop multiple scenarios, an analysis of how the preferred scenario has improved the conditions and performance of the transportation system and how changes in local policies and investments have impacted the costs necessary to achieve the identified performance targets.

**Commendation:** None.

**Corrective Action:** The system performance report must include a thorough description of the measures and actual performance data, not just established targets. Transit performance data must be included in the report as well.

**Recommendations:** Historical trends and visualization are extremely helpful to tell the story of how the state adopted targets and measures are performing within the Montgomery MPO region. The Montgomery MPO may also include local data to track metropolitan planning area performance.

**Schedule for Process Improvement:** The next MTP update (2050 horizon).

**Proposed FHWA/FTA Technical Assistance:** FHWA Planning will provide training on MTP performance measure requirements upon request.



## 4.5 Transit Planning

### 4.5.1 Regulatory Basis

49 U.S.C. 5303 and 23 U.S.C. 134 require the transportation planning process in metropolitan areas to consider all modes of travel in the development of their plans and programs. Federal regulations cited in 23 CFR 450.314 state that the MPO in cooperation with the State and operators of publicly owned transit services shall be responsible for carrying out the transportation planning process.

### 4.5.2 Current Status

Now known as The-M, the former Montgomery Area Transit System (MATS) was purchased by the City of Montgomery in 1974 and contracted with American Transit Corporation and later Queen Management Group until 1998 to operate the system. In 1998, 17 fixed routes were temporarily replaced with a Demand Responsive Transit (DRT) system (call-in reservation system).

After a change of administration, City leaders realized that the newly implemented DRT system was not effectively meeting the needs of Montgomery citizens. A trial run of three new fixed routes was implemented in March 2000, which led to an additional six fixed routes in March 2001 after the overwhelming success of the first three routes. The M is currently owned by the City of Montgomery and operated under a management contract with First Transit Group. The M is funded through farebox revenue, the City of Montgomery, and FTA's Section 5307 urbanized area funding program. Fares for the system are \$2.00 for a one-way trip with free transfers at the transfer centers between routes.

The M Transit System in Montgomery, AL is managed by Mr. Sam Tensley and provides service Monday through Saturday within the Montgomery City limits. There are 14 fixed routes with complementary paratransit service available within the City of Montgomery limits.

The current M Transit Development Plan Update 2023-2027 is published on the Montgomery MPO website.

The Montgomery MPO indicated the Central Alabama Regional Planning and Development Commission is responsible for developing the Human Services Coordinated Transportation Plan, which is typically updated every 4-5 years (last updated in 2021). The MPO has no official development role but is invited to be a part of the effort.

The Montgomery MPO discussed how transit projects are considered and reflected in 2045 LRTP. Importantly, Alabama State Law does not allow for the use of state funds on transit capital projects (i.e., only FTA funds are used for that purpose), and Montgomery (to date) has never





“flexed” FHWA funds to FTA for transit purposes. However, beyond the traditional transit projects, the Montgomery MPO noted that the region currently has two (2) micro-transit zones (downtown and the airport).

#### 4.5.3 Findings

**(1)** The Montgomery MPO does not have all the elements to meet the requirements of 23 CFR 450.314(a). Specifically, the Montgomery MPO failed to provide the federal review team with a **written agreement** between the MPO, the State(s), and the providers of public transportation that documents 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(s), and the providers of public transportation serving the MPA.

**(2)** The Montgomery MPO transit activities does not fully meet the requirements of the public participation outlined in 23 CFR 450.316(a). Specifically, explanation of how the MTP, TIP, UPWP, and PPP were developed in consultation with other interested parties. According to regulation, the MPO shall develop and use a documented participation plan that defines a process for providing individuals, affected **public agencies**, representatives of **public transportation employees**, public ports, freight shippers, providers of freight transportation services, private providers of transportation (including intercity bus operators, employer-based commuting programs, such as carpool program, vanpool program, transit benefit program, parking cash-out program, shuttle program, or telework program), **representatives of users of public transportation**, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process.

Under 23 CFR 450.316(a)(1)(vii), the Montgomery MPO failed to meet requirements. 23 CFR 450.316(a)(1)(vii) states ‘seeking out and considering the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services’ was not documented nor presented to the federal review team. While the MPO has sporadically collected data in PPP Assessments and Outreach Tracking Reports, the PPP is unclear as to how this information is used to influence decision making. Moreover, the MPO’s measures appear largely quantitative but without the corresponding baseline, target numbers and timelines that would indicate program success or challenges; neither can be assessed.

**Commendation:** None.

**Corrective Action:** **(1)** The Montgomery MPO must provide a written agreement between the MPO, the State(s), and the providers of public transportation that documents 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(s), and the providers of public transportation serving the MPA.

(2) The Montgomery MPO must provide descriptive and quantifiable documentation of the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services.

**Recommendations:** None.

**Schedule for Process Improvement:** March 2025.

**Proposed FHWA/FTA Technical Assistance:** FHWA/FTA will work with the Montgomery MPO to provide examples of organizations with effective public participation upon request.

## 4.6 Transportation Improvement Program

### 4.6.1 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.

### 4.6.2 Current Status

The current FY 2024-2027 TIP was adopted by the Montgomery MPO Policy Board on September 28, 2023, and covers a four-year planning horizon. The TIP contains a compliant list of projects with sufficient descriptive material, as required. In developing the TIP, the MPO staff stated they start with a “call for projects and project proposals.” During the site visit, the Montgomery MPO staff noted that STIP revisions are regularly processed, based largely on cost overruns per



information provided by ALDOT and local jurisdictions. MPO staff noted that sometimes other projects/project phases need to be moved outside the TIP for purposes of continuously maintaining fiscal constraint. The MPO provided the recent example of the TIP Amendment to include the new project awarded from the Reconnecting Communities Program (RCP) for \$36 million to the City of Montgomery, AL.

The Montgomery MPO TIP FY2024-2027 includes a section (Section 1.14 Project Selection and Prioritization) describing the screening and prioritization of projects. The criteria listed are: 1) funding availability 2) agreement by MPO member governments 3) local factors such as traffic volume, traffic patterns, safety, demographics, development patterns, and land use 4) projects selected based on need.

The Montgomery MPO TIP does not include prioritization of projects based on 1) project readiness, 2) relationship to MTP, and 3) contribution to achieving performance targets. Furthermore, the TIP does not identify changes in priorities from previous TIPs (nor does it state that the priorities remain the same), list major projects implemented from the previous TIP (it does include a list of all projects obligated for construction under the previous TIP, but it does not identify major projects), and it does not identify significant delays of major projects. Therefore, it is difficult to determine if the TIP is meeting all the requirements of 23 CFR 450.326(n).

#### **4.6.3 Findings**

The Federal Review Team finds the Montgomery MPO not in compliance with 23 CFR 450.326(d), which states The TIP must include, to the maximum extent practicable, a description of the anticipated effect of the TIP toward achieving the performance targets identified in the MTP, linking investment priorities to those performance targets. This must include the anticipated effect of the TIP toward achieving Transit Asset Management (TAM) and Public Transportation Agency Safety Plan (PTASP) targets as well. The MPO could creatively use the performance targets identified by ALDOT as a key scoring criterion for the strategic capacity, spot mobility/safety, roadway reconstruction/modernization, traffic management technology, multiuse trails and bicycle facilities, pedestrian facilities, and other funding categories as a direct aid to help guide investment priorities to achieve optimal performance.

The Federal Review Team finds the Montgomery MPO not in compliance with 23 CFR 450.326(n)(1), which states: As a management tool for monitoring progress in implementing the MTP, the TIP should identify the criteria and process for prioritizing the implementation of MTP elements through the TIP (including multimodal trade-offs) for inclusion in the TIP and any changes in priorities from previous TIPs. The MPO could clearly outline criteria and procedures for scoring techniques used for prioritizing projects that are included within the TIP, maybe stated



in an appendix. Document any formal descriptions of monitoring procedures and how these procedures are used to monitor results and how they are used to improve future TIPs.

**Commendation:** None.

**Corrective Action: (1)** The Montgomery MPO must include narrative and anticipated effect of the TIP toward achieving the performance targets identified in the MTP, linking investment priorities to those performance targets.

**(2)** The Montgomery MPO must monitor progress in implementing the TIP by identifying the criteria and process for prioritizing projects (including multimodal trade-offs) for inclusion and any changes in priorities from previous TIPs.

**Recommendations:** None.

**Schedule for Process Improvement:** Corrective Actions, one (1) year from the date of this review.

**Proposed FHWA/FTA Technical Assistance:** FHWA Planning will conduct training with MPO staff to demonstrate linking projects to performance measures upon request.

## 4.7 Public Participation

### 4.7.1 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.



#### **4.7.2 Current Status**

The current Montgomery MPO Public Participation Plan was adopted by the Montgomery MPO Policy Board on February 24, 2014.

There are no quantifiable measures to determine effectiveness/meaningfulness of public involvement. The MPO did not document it demonstrated an effort to act in good faith to create strategies for meaningful public involvement to receive quality feedback. The MPO has not documented that it provided a reasonable opportunity to the tribal lands located within its jurisdiction to participate in transportation planning processes, including the development of the Public Participation Plan, LRTP and the TIP.

According to regulation, The MPO must periodically review the effectiveness of the procedures and strategies contained in the public participation plan, especially when trying to ensure equitability of transportation/transit projects, to guarantee a full and open participation process. This would include but are not limited to strategic outreach to LEP Populations, EJ Populations and Title VI Communities. The MPO attempted to produce a summary report of comments received during the MTP/TIP development process. However, it is unclear on how the engagement received from public input, led to MTP/TIP planning decisions, and the effectiveness of that engagement.

#### **4.7.3 Findings**

The Federal Review Team finds the Montgomery MPO's Public Participation Plan (PPP) is in non-compliance with the requirements of 23 CFR 450.316. The Montgomery MPOs Public Participation Plan is lacking adequately in meaningful public participation. According to the regulations, the Montgomery MPOs PPP lacks descriptive and explicit procedures, strategies, and desired outcomes for public input.

The Montgomery MPO failed to document and provide timely notice and reasonable access to information about transportation issues and processes. The Montgomery MPO attempts to make public information (technical information and meeting notices) available in electronically accessible formats and means, such as the World Wide Web. However, the Federal Review Team noticed lots of issues with accessibility of several documents and summaries on the Montgomery MPO ([www.montgomerympo.org](http://www.montgomerympo.org)) website.

It was also noted that the Montgomery MPO lacked documentation of public comment and responses to the MTP and TIP in appendices or narrative of the documents. The Montgomery 2014 PPP failed to provide documentation of its public involvement in the document narrative or in appendices/attachments. Flyers, social media screenshots, newspaper articles, television, transit system advertisements, etc. that the MPO use to communicate with the public need to be documented.



Visualization should be documented and addressed in the report. It should include the use of maps and other visual aids. The MPO should have documented specific parameters of monitoring the effectiveness of public involvement activities.

**Commendation:** None.

**Corrective Action:** The PPP must contain timelines for involvement, outreach methodologies, and methods for contacting traditionally underserved populations. The PPP must contain specific outreach methods for the MPO's main planning documents (MTP, TIP, UPWP, etc.).

The Montgomery MPO must include in its updated PPP descriptive or quantifiable strategies for seeking out and considering the needs of the traditionally underserved, minorities, and those with low incomes. The MPO must fully discuss and document strategies for periodically reviewing the effectiveness of the PPP, specifically with the explanation of (a) how the plan was developed in consultation with other interested parties; (b) description of the visualization techniques utilized in the LRTP and TIP; and (c) how this information is used to influence decision making.

**Recommendations:** The Montgomery MPO should update its PPP to incorporate descriptive and quantifiable strategies to seek out communities of concern.

**Schedule for Process Improvement:** One (1) year from the date of this review. (August 2025)

**Proposed FHWA/FTA Technical Assistance:** FHWA and FTA can provide examples of effective public involvement practices and plans upon request.

## **4.8 Civil Rights (Title VI, EJ, LEP, ADA)**

### **4.8.1 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 can meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency.

#### **4.8.2 Current Status**

The Montgomery MPO conducts regular public involvement meetings and has a public participation plan drafted in 2014. The MPO has adopted the City of Montgomery Title VI Program Plan as its own. FHWA does not require MPOs to have Title VI Implementation Plans, but FTA does.

MPOs are required by FHWA to have signed the standard USDOT nondiscrimination assurances which cover all applicable civil rights laws and regulations as well as have established internal controls to ensure nondiscrimination. There was no evidence that the Montgomery MPO had either a signed assurance of nondiscrimination or internal controls to ensure nondiscrimination. There was evidence of demographic and environmental justice data being collected, but no evidence that this data was being reviewed and analyzed in a way that would ensure nondiscrimination in their transportation decision making process.

The Montgomery MPO submitted ADA transition plans for the cities and counties they represent. Each plan is slightly different, but does contain most of the required items, such as identifying the responsible party and inventorying barriers to access.

#### **4.8.3 Findings**

The Federal Review Team finds the Montgomery MPO not in compliance with 23 CFR 450.316(a)(1)(vii), which requires the needs of those “traditionally underserved” by existing transportation systems, such as low-income and/or minority households, be sought out and considered by the Montgomery MPO transportation planning body.

There is no evidence presented to suggest that the MPO seeks out and considers the needs, values, and concerns specifically from groups that are traditionally underserved and underrepresented by existing transportation systems who may face challenges accessing employment and other services. The Montgomery MPO also lacked evidence that it reviewed



the effectiveness of procedures and strategies contained in the public participation plan to ensure open and full participation in the MPO's planning process by EJ communities.

MPOs must have clear processes in place to assess the distribution of impacts on different socio-economic groups for the investments identified in the TIP. Using ALDOT's template, the MPO have self-certification statements included in each new TIP (see pages 129-140 of FY2024-2027 TIP). Without established processes and controls, the MPO is unable to be certified regarding its compliance with the provisions of Title VI.

Not all the ADA transition plans describe a plan to address these barriers with a timeline for completion. The most current ADA transition plan was from 2020 (City of Montgomery). It is recommended that all ADA transition plans, from the various jurisdictions, be updated with timelines for addressing barriers and showing progress made in correcting deficiencies thus far.

The Montgomery MPO should refer to USDOT's Promising Practices for Meaningful Public Involvement in the Transportation Decision-Making Guide to improve its public involvement process.

The Federal Review Team finds the Montgomery MPO not in compliance with 23 CFR 200.9(b)(5) which requires the MPO to develop a program to conduct Title VI reviews of program areas.

**Commendation:** None.

**Corrective Action:** (1) The Montgomery MPO must perform a formal evaluation of their public involvement process per the requirements of the periodic assessment (23 CFR 450.316(b)).

(2) The Montgomery MPO must sign the standard USDOT nondiscrimination assurances. Also, the MPO must have Internal Controls in place to ensure nondiscrimination, including collecting demographic data and analyzing that data to determine the distributional effects of the transportation investments identified in the TIP.

**Recommendations:** (1) The Montgomery MPO should actively seek out participation from the underserved communities and document their efforts to do so. The MPO should evaluate their outreach efforts regularly and actively make changes to those efforts if participation is lacking. The Public Participation Plan should be updated as its 10 years old.

(2) All ADA transition plans, from various jurisdictions, should be updated as the most current one is from 2020, the oldest being from 2009. Ensure all ADA transition plans contain the required elements. Also, ensure public outreach efforts extend to disabled groups, representatives, communities, etc. It is advised that a disabled person or representative be placed on the technical committee. Ensure the website reflects the most current documentation and working links for civil rights required items.





**Schedule for Process Improvement:** Immediately, sign the standard USDOT nondiscrimination assurances and update the website. Within six months, evaluate the public involvement process and show internal controls and processes in place to ensure nondiscrimination. Within 12 months, have all cities and counties represented by this MPO update their ADA transition plan.

**Proposed FHWA/FTA Technical Assistance:** FHWA AL Division Civil Rights Specialist will provide technical assistance as needed in any of the areas covered in this section upon request.

## 4.9 Consultation and Coordination

### 4.9.1 Regulatory Basis

23 U.S.C. 134(g) & (i)(5)-(6) and 23 CFR 450.316(b-e) set forth requirements for consultation in developing the MTP and TIP. Consultation is also addressed specifically in connection with the MTP in 23 CFR 450.324(g)(1-2) and in 23 CFR 450.324(f)(10) related to environmental mitigation.

In developing the MTP and TIP, the MPO shall, to the extent practicable, develop a documented process that outlines roles, responsibilities, and key decision points for consulting with other governments and agencies as described below:

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

### 4.9.2 Current Status

The federal review team could not locate any consultation procedures, contacts, or received feedback from federal, state, or local resource agencies. ALDOT has provided documentation and organizes the process for environmental consultation with federal, state, and local resource agencies as required by 23 CFR 450.324(g) for the MPOs when concerning the MTPs.

### 4.9.3 Findings

The Montgomery MPO complies with 23 CFR 450.324(g), although the consultation efforts are not documented in any of the MPO's planning documents.

**Commendation:** None.



**Corrective Action:** None.

**Recommendations:** The MPO should include the consultation efforts of ALDOT in the appendix of the MTP.

**Schedule for Process Improvement:** The next MTP update (2050 horizon).

**Proposed FHWA/FTA Technical Assistance:** None.

## 4.10 List of Obligated Projects

### 4.10.1 Regulatory Basis

23 U.S.C. 134(j)(7) and 23 CFR 450.334 requires that the State, the MPO, and public transportation operators cooperatively develop a listing of projects for which Federal funds under 23 U.S.C. or 49 U.S. C. Chapter 53 have been obligated in the previous year. The listing must include all federally funded projects authorized or revised to increase obligations in the preceding program year and, at a minimum, the following for each project:

- The amount of funds requested in the TIP.
- Federal funding obligated during the preceding year.
- Federal funding remaining and available for subsequent years.
- Sufficient description to identify the project.
- Identification of the agencies responsible for carrying out the project.

### 4.10.2 Current Status

FY2023 Annual List of Obligated Projects report was included in the FY2024-2024 TIP (pages 123-126). The MPO's process satisfies the federal requirements.

### 4.10.3 Findings

The Montgomery MPO Annual List of Obligated Project substantially complies with the requirements of 23 CFR 450.334. The current version of the document is just a list of projects with no context or narrative of the purpose of the document.

**Commendation:** None.

**Corrective Action:** None.



**Recommendations:** A standalone document posted on the MPOs website with an excellent written narrative, summary financial investment information, the purpose of the report, and a clear, easy to understand project list with all required specific information would be useful when being transparent to the public.

**Schedule for Process Improvement:** The next project list update, FY 2025.

**Proposed FHWA/FTA Technical Assistance:** FHWA can provide examples of Annual List of Obligated Projects Reports upon request.

## **4.11 Freight Planning**

### **4.11.1 Regulatory Basis**

The MAP-21 established in 23 U.S.C. 167 a policy to improve the condition and performance of the national freight network and achieve goals related to economic competitiveness and efficiency; congestion; productivity; safety, security, and resilience of freight movement; infrastructure condition; use of advanced technology; performance, innovation, competition, and accountability, while reducing environmental impacts.

In addition, 23 U.S.C. 134 and 23 CFR 450.306 specifically identify the need to address freight movement as part of the metropolitan transportation planning process.

### **4.11.2 Current Status**

In the 2045 Long Range Plan, there is a section that discusses freight modeling and future demand. Additionally, the Montgomery MPO Regional Freight Plan identifies a regional freight network and strategies for improving freight movement in the region, including tasks such as updating the regional truck parking assessment and the examination of freight activity clusters.

The Montgomery MPO noted that the American Trucking Association (ATA) and Airport are members of the TAC. However, the MPO noted that the ATA tends to hold its data close for freight partner proprietary purposes. The MPO also noted that the new Inland Intermodal Center will increasingly be a partner in the metropolitan transportation planning process over time.

### **4.11.3 Findings**

The Montgomery MPO complies with the requirements of 23 CFR 450.306, and the MPO considers freight in the planning process as required by 23 U.S.C. 167. The MTP (Section 4.7)



discusses all different modes of freight transportation. However, including a proposed project list for freight specific projects would be recommended.

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** None.

**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** N/A

## **4.12 Environmental Mitigation/Planning Environmental Linkage**

### **4.12.1 Regulatory Basis**

23 U.S.C. 134(i)(2)(D) 23 CFR 450.324(f)(10) requires environmental mitigation be set forth in connection with the MTP. The MTP is required to include a discussion of types of potential environmental mitigation activities for the transportation improvements and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan.

23 U.S.C. 168 and Appendix A to 23 CFR Part 450 provide for linking the transportation planning and the National Environmental Policy Act (NEPA) processes. A Planning and Environmental Linkages (PEL) study can incorporate the initial phases of NEPA through the consideration of natural, physical, and social effects, coordination with environmental resource agencies, and public involvement. This will allow the analysis in the PEL study to be referenced in the subsequent NEPA document once the project is initiated, saving time and money with project implementation.

### **4.12.2 Current Status**

The environmental mitigation section is contained in Sections 3.8 and 3.9 of the MTP. The ALDOT contacts various state resources for any potential environmental conflicts. The MPO does not currently have any active PEL studies.

### **4.12.3 Findings**

The 2045 Montgomery MPO Long Range Plan is compliant with the requirements of 23 CFR 450.324. There are no visualizations of the planned transportation improvements compared to the environmentally sensitive areas in the planning area.



**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** Mapping the potential environmental conflict areas with the projects proposed in the Long-Range Plan may provide project sponsors with important information when delivering projects, which can reduce or avoid delays (especially when going through the NEPA process) in project delivery.

**Schedule for Process Improvement:** Before FY 2027 Certification Review.

**Proposed FHWA/FTA Technical Assistance:** FHWA will cooperate with ALDOT to deliver training on environmental consultation and environmental mitigation plans upon request.

## 4.13 Transportation Safety

### 4.13.1 Regulatory Basis

23 U.S.C. 134(h)(1)(B) requires MPOs to consider safety as one of ten planning factors. As stated in 23 CFR 450.306(a)(2), the planning process needs to consider and implement projects, strategies, and services that will increase the safety of the transportation system for motorized and non-motorized users.

In addition, SAFETEA-LU established a core safety program called the Highway Safety Improvement Program (HSIP) (23 U.S.C. 148), which introduced a mandate for states to have Strategic Highway Safety Plans (SHSPs). 23 CFR 450.306 (d) requires the metropolitan transportation planning process should be consistent with the SHSP, and other transit safety and security planning.

### 4.13.2 Current Status

The MPO does not include safety considerations in long-range planning through the Metropolitan Transportation Plan (MTP), Unified Planning Work Program (UPWP), and Transportation Improvement Program (TIP). The MPO does publish crash data in their long-range transportation plan (LRTP).



### 4.13.3 Findings

The Montgomery MPO substantially meets the requirements of 23 CFR 450.306(a)(2).

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** The MTP could incorporate a location-based safety analysis to prioritize the implementation of proven safety countermeasures based on crash history. Additionally, the MTP would benefit from a systemic safety analysis and a discussion on countermeasures.

**Schedule for Process Improvement:** Before FY 2027 certification review.

**Proposed FHWA/FTA Technical Assistance:** The Federal Highway Administration (FHWA) can offer training to Alabama Department of Transportation (ALDOT) and Metropolitan Planning Organization (MPO) staff on conducting crash analysis and developing systemic safety plans, if necessary, and upon request.

## 4.14 Transportation Security Planning

### 4.14.1 Regulatory Basis

23 U.S.C. 134(h)(1)(C) requires MPOs to consider security as one of ten planning factors. As stated in 23 CFR 450.306(a)(3), the Metropolitan Transportation Planning process provides for consideration of security of the transportation system.

The regulations state that the degree and consideration of security should be based on the scale and complexity of many different local issues. Under 23 CFR 450.324(h), the MTP should include emergency relief and disaster preparedness plans and strategies and policies that support homeland security, as appropriate.

### 4.14.2 Current Status

The MPO has included a dedicated section in the MTP (Section 3.9 Environmental Mitigation Climate Change) that focuses on climate change and resilience of the transportation network.



### 4.14.3 Findings

The Montgomery MPO 2045 Long Range Plan complies with the requirements of 23 CFR 450.306(a)(3).

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** None.

**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** N/A

## 4.15 Nonmotorized Planning/Livability

### 4.15.1 Regulatory Basis

23 U.S.C. 217(g) states that bicyclists and pedestrians shall be given due consideration in the comprehensive transportation plans developed by each MPO under 23 U.S.C. 134. Bicycle transportation facilities and pedestrian walkways shall be considered, where appropriate, in conjunction with all new construction and reconstruction of transportation facilities.

23 CFR 450.306 sets forth the requirement that the scope of the metropolitan planning process "will increase the safety for motorized and non-motorized users; increase the security of the transportation system for motorized and non-motorized users; and protect and enhance the environment, promote energy conservation, improve the quality of life.

### 4.15.2 Current Status

Chapter 4 and Chapter 6 of the MTP contain a discussion of the safety, security, and accessibility of nonmotorized network in the planning area, review of existing plans, various maps and



inventory or existing conditions, a user needs assessment, and recommended improvements to enhance network connectivity.

The Walk Bike River Region plan was last updated in 2018 and adopted in 2019. The Montgomery MPO noted the next update would occur in FY2025.

#### **4.15.3 Findings**

The 2045 Montgomery Long Range Plan is compliant with the requirements of 23 CFR 450.306.

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** None.

**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** N/A

## **4.16 Integration of Land Use and Transportation**

### **4.16.1 Regulatory Basis**

23 U.S.C. 134(g)(3) encourages MPOs to consult with officials responsible for other types of planning activities that are affected by transportation in the area (including State and local planned growth, economic development, environmental protection, airport operations, and freight movements) or to coordinate its planning process, to the maximum extent practicable, with such planning activities.

23 U.S.C. 134 (h)(1)(E) and 23 CFR 450.306(a)(5) set forth requirements for the MPO Plan to protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns.

### **4.16.2 Current Status**

The MPO has included a dedicated section in the MTP (Section 3.2 Land Use) that focuses on land use and visualization of the land uses in the transportation network. The Montgomery MPO 2045 Long Range Plan contains land use and transportation comparisons throughout the





document as well.

### **4.16.3 Findings**

The MPO has met the requirements of 23 U.S.C. 134(g)(3) and 23 U.S.C. 134 (h)(1)(E).

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** None.

**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** N/A

## **4.17 Travel Demand Forecasting**

### **4.17.1 Regulatory Basis**

23 CFR 450.324(f)(1) requires that the Metropolitan Transportation Plan include the projected transportation demand of persons and goods in the Metropolitan Planning Area over the period of the transportation plan. Travel demand forecasting models are used in the planning process to identify deficiencies in future year transportation systems and evaluate the impacts of alternative transportation investments. In air quality non-attainment and maintenance areas, they are also used to estimate regional vehicle activity for use in mobile source emission models that support air quality conformity determinations.

### **4.17.2 Current Status**

The Montgomery MPO 2045 Long Range Transportation Plan has travel demand forecasting in two sections, Chapter 6 and 7. Chapter 6 gives an overview of the needs identified through the travel demand modeling process, while Chapter 7 is narratively focused on evaluation through comparative qualitative analysis. There are several visualizations in Chapter 6 to enhance the data.

### **4.17.3 Findings**

The Montgomery MPO has met the requirements of 23 CFR 450.324(f)(1).

**Commendation:** None.

**Corrective Action:** None.



**Recommendations:** None.

**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** N/A

## 4.18 Air Quality

### 4.18.1 Regulatory Basis

The air quality provisions of the Clean Air Act (42 U.S.C. 7401) and the MPO provisions of Titles 23 and 49 require a planning process that integrates air quality and metropolitan transportation planning, such that transportation investments support clean air goals. Under 23 CFR 450.324(m), a conformity determination must be made on any updated or amended transportation plan in accordance with the Clean Air Act and the EPA transportation conformity regulations of 40 CFR Part 93. A conformity determination must also be made on any updated or amended TIP, per 23 CFR 450.326(a).

### 4.18.2 Current Status

The Montgomery MPO is currently in attainment for all National Ambient Air Quality Standards (NAAQS). Conformity determination is not required.

### 4.18.3 Findings

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** None.

**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** N/A



## 4.19 Congestion Management Process / Management and Operations

### 4.19.1 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.

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

### 4.19.2 Current Status

The 2045 Montgomery MPO Long Range Plan has the Congestion Management Process included in Chapter 5, as well as the standalone document - Montgomery Congestion Management Process Plan (CMP) 2023-2027. The Montgomery MPO staff noted the latest CMP 2023-2027 was developed in advance of the TIP FY2024-2027 to help inform which projects are ultimately programmed. CMP goals are based upon 2045 LRTP objectives, and the CMP and LRTP use the same network.

The MPO staff noted that local projects are mostly “maintenance” while ALDOT sponsored projects mostly address “capacity” needs. MPO staff also mentioned that the CMP has resulted in some traffic signals being removed and replaced with roundabouts, and there have been some conversions of one-way/two-way streets in the downtown area. MPO staff also noted that the MPOs Access Management Manual (adopted in 2021) helps guide implementation of the regions access management related projects.

### 4.19.3 Findings

The Montgomery MPO has met the requirements of 23 CFR 450.322.

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** None.



**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** N/A



## 5.0 CONCLUSION AND RECOMMENDATIONS

The FHWA and FTA review found that the metropolitan transportation planning process conducted in the Montgomery urbanized area meets (with corrective actions) Federal planning requirements as follows.

### 5.1 Commendations

There are no noteworthy practices for the Montgomery MPO documented in this report.

### 5.2 Corrective Actions

The following are corrective actions that the Montgomery MPO must take to comply with Federal Regulations:

- The Montgomery MPO must reassess how the policy board votes to ensure equal transit representation on the policy board; Additionally, MPO will need to outline the member framework specifically for addressing 23 CFR 450.310(d)(3)(iii) requirement.
- The UPWP must contain an Indirect Cost Allocation Plan (ICAP) and/or Certificate of Indirect Costs, if the MPO uses federal funds for reimbursement of indirect costs. If the MPO does not request reimbursement for indirect costs, there must be a statement in the UPWP indicating that there are no federal funds used for indirect costs.
- The system performance report must include a thorough description of the measures and actual performance data, not just established targets. Transit performance data must be included in the report as well.
- The Montgomery MPO must provide a written agreement between the MPO, the State(s), and the providers of public transportation that documents 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(s), and the providers of public transportation serving the MPA.
- The Montgomery MPO must provide descriptive and quantifiable documentation of the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services.
- The Montgomery MPO must include narrative and anticipated effect of the TIP toward achieving the performance targets identified in the MTP, linking investment priorities to those performance targets.
- The Montgomery MPO must monitor progress in implementing the TIP by identifying the criteria and process for prioritizing projects (including multimodal trade-offs) for inclusion and any changes in priorities from previous TIPs.



- The PPP must contain timelines for involvement, outreach methodologies, and methods for contacting traditionally underserved populations. The PPP must contain specific outreach methods for the MPO's main planning documents (MTP, TIP, UPWP, etc.).  
The Montgomery MPO must include in its updated PPP descriptive or quantifiable strategies for seeking out and considering the needs of the traditionally underserved, minorities, and those with low incomes. The MPO must fully discuss and document strategies for periodically reviewing the effectiveness of the PPP, specifically with the explanation of (a) how the plan was developed in consultation with other interested parties; (b) description of the visualization techniques utilized in the LRTP and TIP; and (c) how this information is used to influence decision making.
- The Montgomery MPO must perform a formal evaluation of their public involvement process per the requirements of the periodic assessment (23 CFR 450.316(b)).
- The Montgomery MPO must sign the standard USDOT nondiscrimination assurances. Also, the MPO must have Internal Controls in place to ensure nondiscrimination, including collecting demographic data and analyzing that data to determine the distributional effects of the transportation investments identified in the TIP.

### 5.3 Recommendations

The following are recommendations that would improve the transportation planning process:

- The Montgomery MPO should update its website accordingly to ensure that it is user-friendly and that all transportation related products such as the MPO Policy Board Bylaws, CAC Bylaws, and TAC Bylaws with voting members (such as The M Transit) are current and displayed in an easy and accessible manner for the public and oversight agencies.
- The Montgomery MPO should monitor progress in implementing the TIP by identifying the criteria and process for prioritizing projects (including multimodal trade-offs) for inclusion and any changes in priorities from previous TIPs. The MPO could clearly outline criteria and procedures for scoring techniques used for prioritizing projects that are included within the TIP, possibly stated in an appendix. Document any formal descriptions of monitoring procedures and how these procedures are used to monitor results and how they are used to improve future TIPs.
- The Montgomery MPO should refer to USDOT's Promising Practices for Meaningful Public Involvement in the Transportation Decision-Making Guide to improve its public involvement process. They should actively seek out participation from the underserved communities and document their efforts to do so.
- All ADA transition plans from various jurisdictions should be updated as the most current one is from 2020, the oldest being from 2009. Ensure all ADA transition plans contain the required elements. Also, ensure public outreach efforts extend to disabled groups, representatives, communities, etc. It is advised that a disabled person or representative be placed on the technical committees. Ensure the website reflects the most current documentation and working links for civil rights required items.



- The MPO should include the consultation efforts of ALDOT in the appendix of the MTP.
- A standalone document posted on the MPOs website with an excellent written narrative, summary financial investment information, the purpose of the report, and a clear, easy to understand project list with all required specific information would be useful when being transparent to the public.
- Mapping the potential environmental conflict areas with the projects proposed in the MTP may provide project sponsors with important information when delivering projects, which in terms can reduce or avoid delays (especially when going through the NEPA process) in project delivery.
- The MTP could incorporate a location-based safety analysis to prioritize the implementation of proven safety countermeasures based on crash history. Additionally, the MTP would benefit from a systemic safety analysis and a discussion on countermeasures.

## 5.4 Training/Technical Assistance

The following training and technical assistance are recommended to assist the MPO with improvements to the transportation planning process:

- FHWA/FTA will work with the Montgomery MPO to provide guidance on ensuring fair and equal voting in the transportation planning process.
- FHWA and FTA can provide technical assistance or an example ICAP and/or Certificate of Indirect Costs to the MPO upon request. The assigned FHWA Planner will assist the Montgomery MPO staff upon request in creating an ICAP and/or certificate of indirect costs.
- FHWA Planning will provide training on MTP performance measure requirements upon request.
- FHWA/FTA will work with the Montgomery MPO to provide examples of organizations with effective public participation upon request.
- FHWA Planning will conduct training with MPO staff to demonstrate linking projects to performance measures upon request.
- FHWA and FTA can provide examples of effective public involvement practices and plans upon request.
- FHWA AL Division Civil Rights Specialist will provide technical assistance as needed in any of the areas covered in this section upon request.
- FHWA can provide examples of Annual List of Obligated Projects Reports upon request.
- FHWA will cooperate with ALDOT to deliver training on environmental consultation and environmental mitigation plans upon request.
- The Federal Highway Administration (FHWA) can offer training to Alabama Department of Transportation (ALDOT) and Metropolitan Planning Organization (MPO) staff on conducting crash analysis and developing systemic safety plans, if necessary, and upon request.



U.S. Department of Transportation  
**Federal Highway Administration**  
**Federal Transit Administration**





## APPENDIX A - PARTICIPANTS

The following individuals were involved in the Montgomery, Alabama urbanized area on-site review:

- Larry Anderson, FHWA Headquarters (virtual)
- Shontrill M. Lowe, FHWA Alabama Division
- Aaron Dawson, FHWA Alabama Division
- Jeff Shelley, DDA FHWA Alabama Division
- Christine Medina, FHWA Alabama Division
- Timothy Heisler, FHWA Alabama Division
- Lynne Urquhart, FHWA Alabama Division
- Tammy Keely Wright, FHWA Alabama Division (virtual)
- Simona Petrick, FHWA Alabama Division (virtual)
- Clint Andrews, FHWA Alabama Division (virtual)
- Wilbert Wilson, FHWA Alabama Division (virtual)
  
- Brandon Oliver, FTA Region 4 (virtual)
- Eva Steinman, FTA Headquarters (virtual)
  
- Robert Smith, Metropolitan Planning Director, Montgomery MPO
- Casey Lewis, Senior Planner, Montgomery MPO
- Lisa Hart, Planner, Montgomery MPO
- James Askew, GIS, Montgomery MPO
- Nita Armstead, Assistant, Montgomery MPO
  
- Sam Tensley, Manager, The M Transit
- Cody Calhoun, The M Transit
  
- Barrett Dees, Local Transportation, Alabama Department of Transportation
- Bryan Fair, Transit, Alabama Department of Transportation
- Brad Lindsey, Local Transportation, Alabama Department of Transportation
- Cornell Tatum, Civil Rights, Alabama Department of Transportation



## APPENDIX B - STATUS OF FINDINGS FROM LAST REVIEW

One of the priorities of each certification review is assessing how well the planning partners in the area have addressed corrective actions and recommendations from the previous certification review. This section identifies the corrective actions and recommendations from the previous certification and summarizes discussions of how they have been addressed.

**Recommendation 1:** The MPO should document the process on how the transit representatives for both the M – Montgomery Area Transit System and ACRT were selected and whether or not the MPO members agreed to the selection. No update to the MPO bylaws has occurred since the last Certification Review.

Disposition: The most recent agreement was executed in 1995, with its last bylaws update in 2015, with a March 2021 update of the Citizens Advisory Committee (CAC) Bylaws.

**Recommendation 2:** The Federal Review Team recommends the following for the MPO to include in the next UPWP update: To review the MPO’s COOP and update it for emergency situations.

Disposition: The Montgomery MPO has yet to update its COOP for emergency situations.

**Recommendation 3:** The Walk Bike River Region Plan in 2018 will be incorporated into the 2045 LRTP with capacity and maintenance projects in the 2045 LRTP reviewed for designation as a pedestrian or bicycle route.

Disposition: The Montgomery MPO continues to incorporate pedestrian or bicycle projects into the capacity and maintenance projects.

**Recommendation 4:** The Federal Review Team recommends the MPO to consider incorporating CMP strategies that are low cost and innovative on local and ALDOT projects.

Disposition: The Montgomery MPO are incorporating very few low cost and innovative strategies on local roads and ALDOT projects.

**Recommendation 5:** The MPO plans to update the Public Participation Plan as well as evaluate the current effectiveness of their efforts soon, and advancements in their public participation techniques have already begun.

Disposition: The Montgomery MPO has failed to start an update to the 2014 Public



Participation Plan, nor update with amendments that would cover virtual public participation from COVID-19 procedures.

**Recommendation 6:** The Federal Review Team recommends that the MPO list a full-time ADA coordinator on the MPO website, although a staff member carries this duty, this contact information has not yet been made available to the public at the MPO level.

Disposition: The Montgomery MPO has yet to officially name a staff member to carry out this duty.



## APPENDIX C – PUBLIC COMMENTS

### Attendees:

- Johnnie Sankey, CAC member
- Isaiah Sankey, MPO Policy Board member
- Brenda Baine, Mt. Zion AME Church
- Tony Baine, Mt. Zion AME Church
- Vivian Handy, Mt. Zion AME Church
- Rebecca Martin, Chisholm Improvement Association
- Trenika Thomas, Chisholm Improvement Association
- Jimmie Coleman, SDAC
- Terry Robinson, Thompson Engineering

- ❖ What is the role of the CAC? How many citizens are on it? (Questions answered)
- ❖ Concerned about communities of color getting a fair share of projects.
- ❖ The MPO drives the process, and some communities get more projects than others.
- ❖ Those who don't say anything or speak up do not get any projects.
- ❖ There should be a more collaborative effort between the three boards (Policy, TAC, CAC)
- ❖ The process is a fair process.
- ❖ There is no "introductory class" for new Policy Board members.
- ❖ It is very difficult to get public participation at standard meetings.
- ❖ Meetings should be taken to churches or schools.
- ❖ There is room for improvement to take meetings to where people are (especially to underserved/EJ populations)
- ❖ Infrastructure investment makes communities feel better.
- ❖ Neighborhood Association meetings would be a great way to get the word out.
- ❖ We would appreciate FHWA to be part of the discussion on housing, stormwater, sidewalk issues.
- ❖ We need more funding resources to be able to apply for grants.
- ❖ There is a tremendous need for equity committees, local match is a big challenge.



## APPENDIX D - LIST OF ACRONYMS

**ADA:** Americans with Disabilities Act  
**AMPO:** Association of Metropolitan Planning Organizations  
**CAA:** Clean Air Act  
**CFR:** Code of Federal Regulations  
**CMP:** Congestion Management Process  
**CO:** Carbon Monoxide  
**DOT:** Department of Transportation  
**EJ:** Environmental Justice  
**FAST:** Fixing America's Surface Transportation Act  
**FHWA:** Federal Highway Administration  
**FTA:** Federal Transit Administration  
**FY:** Fiscal Year  
**HSIP:** Highway Safety Improvement Program  
**ITS:** Intelligent Transportation Systems  
**LEP:** Limited-English-Proficiency  
**M&O:** Management and Operations  
**MAP-21:** Moving Ahead for Progress in the 21<sup>st</sup> Century  
**MPA:** Metropolitan Planning Area  
**MPO:** Metropolitan Planning Organization  
**MTP:** Metropolitan Transportation Plan  
**NAAQS:** National Ambient Air Quality Standards  
**NO<sub>2</sub>:** Nitrogen Dioxide  
**O<sub>3</sub>:** Ozone  
**PM<sub>10</sub> and PM<sub>2.5</sub>:** Particulate Matter  
**SHSP:** Strategic Highway Safety Plan  
**STIP:** State Transportation Improvement Program  
**TDM:** Travel Demand Management  
**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





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