

Transportation Management Area Planning Certification Review

Federal Highway
Administration

Federal Transit
Administration

2024 Southeast Michigan Transportation Planning Certification Review

Covering the Detroit, Ann Arbor, and Port Huron Urbanized Areas



source: SEMCOG

December 3, 2024

Summary Report



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1.0 EXECUTIVE SUMMARY

On July 23 and 24, 2024, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted a hybrid site visit certification review of the transportation planning process for Southeast Michigan. FHWA and 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.

1.1 Previous Findings

Appendix B of this report provides the findings from the previous (2020) certification review and the Southeast Michigan response summarizing how those findings have been addressed as of 2024.

1.2 Summary of Current Findings

The current review found that the conduct of the metropolitan transportation planning process in the Southeast Michigan urbanized area meets the federal planning requirements.

As a result of this review, on October 30, 2024, FHWA and FTA **certified** the transportation planning process conducted by the Michigan Department of Transportation (MDOT), Southeast Michigan Council of Governments (SEMCOG), and the multiple public transportation operators. In this report, there are many areas that are to be commended, and several recommendations to improve processes. In total, the federal review team found **6 commendations, and 5 recommendations**. Further details of the certification findings are contained in this report.

Commendation 1	<u>Metropolitan Transportation Plan</u> - SEMCOG's Vision 2050 RTP Hub is a great practice that allows interested groups to find all materials related to their LRTP in a single and user-friendly location. SEMCOG has developed innovative tools to assist residents, local governments, and FACs to develop better plans and more effectively implement programs. For example, the Southeast Michigan Water Infrastructure Planning Guide is a highly effective resource that could be adopted nationwide. WATS 2050 LRTP is an example of clear and concise communication. Their newly adopted plan communicates a complex topic visually and engagingly. This is a commendable practice that should be adopted by other MPOs.
Commendation 2	<u>Transportation Improvement Program</u> - SEMCOG has adopted a highly innovative process for linking projects across their required planning documents by assigning a numerical reference system to 'code' projects within their TIP based on 7 overarching policy goals. This ensures links projects back to policy goals in the MTP and other planning documents. This is a commendable practice which will allow the MPO to better track progress made on their goals.
Commendation 3	<u>Unified Planning Work Program</u> - SEMCOG's online interactive tools such as the Flood Risk Tool and the Building Footprint Tool are highly innovative, providing examples that can be shared nationally to assist other MPOs in developing planning assistance products.
Commendation 4	<u>Equity</u> - SEMCOG uses multiple quantitative measures that address impacts to minority and low-income populations. SEMCOG applies a suite of quantitative tools to provide equity analysis for their RTP and TIP through the Environmental Justice Technical Analysis, including their Travel Demand Model, land use simulation model (Urban SIM), the new Southeast Michigan Equity Emphasis Areas Tool, GIS, and other methods.



Commendation 5	<u>Civil Rights</u> - The SEMCOG Title VI links found on the home page of the SEMCOG website are readily available in English, Spanish, and Arabic without the need for members of the public to request Spanish or Arabic translation. Each link directs you to a Title VI webpage that contains Title VI information, LEP Plan, Title VI Complaint Form, and the Title VI Non-Discrimination Plan in the language selected.
Commendation 6	<u>Performance-Based Planning and Programming</u> - SEMCOG and MDOT are commended on the development and implementation of the Multimodal Tool which is a national best practice to help communities apply a Safe System Approach to their transportation planning programming and connection between the project development and selection process to performance-based planning and programming.
Recommendation 1	<u>Public Participation</u> - SEMCOG should more clearly identify the public comment period for amendments with impact to air quality conformity in the PPP.
Recommendation 2	<u>Transportation Improvement Program</u> - The Federal Team (FHWA and FTA certification review participants) recommends SEMCOG, the FACS, and MDOT closely monitor the new 15-day public comment period for cost-change TIP amendments to ensure that this process meets the needs of staff, the MPO committees, and members of the public.
Recommendation 3	<u>Transit Planning</u> – a) The Federal Team recommends SEMCOG work with RTA to further develop its role as the designated recipient of the federal transit funds. That role means that RTA has responsibility for federal transit funds above direct recipients. The Federal Team believes this would help support our mutual interest in receiving and tracking uniform information on the use and prioritization of federal transit funds once they are programmed to direct recipients. b) The Federal Team recommends SEMCOG and RTA continue to develop the FAC prioritization process to continue to clearly align RTP priorities for project selection with the projects ultimately programmed in the TIP. The Federal Team recommends that SEMCOG review all flexible federal funds to determine the eligibility and utility of those funds to assist in advance transit goals in the RTP. SEMCOG and RTA should continue working together on corridor studies and other planning studies like the Thriving Communities.
Recommendation 4	<u>Equity</u> – a) The federal team recommends adding qualitative information to the EJ analysis such as public participation comments, neighborhood stories from residents, and historic information on neighborhoods that were negatively impacted by highway infrastructure projects. Currently, the EJ analysis focuses on quantitative data. However, the MPO also collects good qualitative information from the household surveys. b) The Federal Team encourages SEMCOG to continue exploring activities and methods that further the goals of integrating equity in the transportation planning process through training and peer events with other MPOs with advanced practices in equity. Opportunities are available through the FHWA and FTA <u>Peer Program - Transportation Planning Capacity Building Program (dot.gov)</u> and the National Highway Institute.
Recommendation 5	<u>Civil Rights</u> – a) The Federal Team strongly recommends that SEMCOG adhere to its current schedule to complete a comprehensive self-evaluation and transition plan, including a schedule for taking steps necessary to achieve compliance, by early 2025. Additionally, it is imperative that SEMCOG consult with interested persons, including persons with a disability and organizations representing persons with a disability, as required per 49 CFR 27.11 (c)(2) and 28 CFR 35.105 (b) and (c). b) The Federal Team recommends SEMCOG provide Title VI and ADA non-discrimination training to its employees to further improve its implementation of these programs. c) The Federal Team recommends that SEMCOG remove <i>disability</i> from its Title VI Complaint Form to prevent confusion since complaints of discrimination based on disability are addressed through ADA. This will provide a clearer process for handling Title VI complaints or ADA complaints d) The Federal Team recommends SEMCOG make its Public Participation Plan readily available in English, Spanish, and Arabic. SEMCOG’s Title VI Non-Discrimination Plan and LEP Plan is available in English, Spanish, and Arabic. Currently both the LEP and PPP are referenced in SEMCOG’s Title VI Non-Discrimination Plan, however the PPP is available only in English and would require LEP individuals to request a translated copy.



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. In general, the reviews consist of three primary activities: a hybrid site visit, a review of planning products (in advance of and during the hybrid 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 Metropolitan Planning Organization (MPO(s)), the State Department of Transportation (DOT(s)), and public transportation operator(s) in the conduct of the metropolitan transportation planning process. Joint FTA/FHWA Certification Review guidelines provide agency field reviewers with latitude and flexibility to tailor the review to reflect regional issues and needs.

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.

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 current [Infrastructure Investment and Jobs Act \(IIJA\)](#) signed into law November 15, 2021 continues this requirement.

Southeast Michigan Council of Governments (SEMCOG) is the designated MPO for the Detroit, Ann Arbor and Port Huron urbanized areas. MDOT is the responsible State agency. There are multiple public transportation operators. Membership of SEMCOG consists of elected officials,



education officials, and citizens from the political jurisdictions in the MPO boundary which includes all of 7 Michigan counties: Livingston, Macomb, Monroe, Oakland, St. Clair, Washtenaw, and Wayne.

About SEMCOG



- Formed in 1968
- Governed by a 48 member Executive Committee
- 7 Counties; 93 Cities; 24 Villages; 115 Townships
- 4.75 million people
- Bordered by Canada, Ohio, & Great Lakes

Certification of the planning process is a prerequisite to the approval of Federal funding for metropolitan planning in the area. 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

This report details the findings and process for the planning certification review for the Southeast Michigan region. The review process consisted of a desk review, a hybrid site visit which included off-site tours to Michigan Central Station and the new Detroit Department of Transportation (DDOT) transit terminal, and public involvement opportunities. The certification review covers the transportation planning process conducted cooperatively by the MPO, State, and public transportation operators. Partners in the planning process for Southeast Michigan include, but are not limited to:

- Southeast Michigan Council of Governments (SEMCOG)
- St. Clair County Transportation Study (SCCOTS)



- Washtenaw Area Transportation Study (WATS)
- Regional Transit Authority (RTA)
- Detroit Department of Transportation (DDOT)
- Ann Arbor Area Transportation Authority (AAATA) The Ride
- Suburban Mobility Authority for Regional Transportation (SMART)
- Local governments in the seven-county region
- Michigan Department of Transportation (MDOT)
- Federal Transit Administration (FTA)
- Federal Highway Administration (FHWA)

A list of certification review participants is included in Appendix A.

The previous Southeast Michigan certification review was conducted 2020. An update, provided by SEMCOG, summarizing how the findings from the 2020 review have been addressed is Appendix B.

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

Background information, current status, and key findings are summarized in the body of the report for the following subject areas selected by FHWA and FTA:

1. Public Participation
2. Agreements and Inter-Agency Coordination and Consultation
3. Metropolitan Transportation Plan
4. Transportation Improvement Program
5. Unified Planning Work Program
6. Transit planning
7. Equity
8. Civil Rights
9. Performance-Based Planning and Programming

3.2 Documents Reviewed

The following non-exhaustive list of MPO documents were evaluated as part of this planning process review:

- SE Michigan Certification Review Report, 2020
- Unified Planning Work Program, FY2025
- Vision 2050 Regional Transportation Plan, 2024
- MPO TIP and Self-Certification, FY23-26



- Audited Financial Statements, FY20, FY21, FY22, and FY23
- Title VI Non-Discrimination Plan, 2023
- Public Participation Plan, 2023 and Public Participation Plan, 2020
- Bicycle and Pedestrian Mobility Plan for Southeast Michigan, 2020
- SEMCOG System Performance Report, 2024
- Southeast Michigan Transportation Safety Plan, 2023
- A Guide to Transportation Planning in Southeast Michigan, 2024



4.0 PROGRAM REVIEW

4.1 Public Participation

4.1.1 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, holding public meetings at convenient and accessible locations and times, demonstrating explicit consideration and response to public input, and periodically reviewing the effectiveness of the participation plan.

Executive Order #12898 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.

4.1.2 Current Status

The SEMCOG’s current Public Participation Plan (PPP) was developed and adopted in July 2023. However, SEMCOG’s January 2020 PPP was available on its website through the public participation plan hyperlink at the time of the hybrid site visit. The July 2023 PPP was found using SEMCOG’s Publications quick search tool available on its website. There is no reference on the January 2020 PPP to inform the reader that there is a new version of the PPP. This can lead to confusion on what PPP version is currently in place and the plan standards SEMCOG is using. Upon learning this information, SEMCOG updated the links on its website to direct users to the most current July 2023 PPP.



SEMCOG is governed by individuals on its General Assembly, comprised of elected and appointed officials from all member communities. The General Assembly meets three times a year. SEMCOG's main policy-making body is the Executive Committee, a representative subset of General Assembly delegates and alternates. This committee typically meets six times per year. All Executive Committee and General Assembly meetings are open to the public. In February 2023, SEMCOG convened a Public Participation working group with local government members and stakeholders informing the revision of SEMCOG's PPP. As a follow-up to this working group discussion, SEMCOG staff visited Programs to Educate all Cycles to learn about the transportation and communication needs of people with cognitive disabilities which was included as a part of SEMCOG's public participation efforts to reach people with special needs. SEMCOG continues its efforts to increase public participation and is exploring the International Association for Public Participation (IAP2) spectrum for public participation engagement strategies and looks to add this to their next PPP.

SEMCOG's PPP is updated periodically with revisions developed in consultation with focus groups or interested parties and final approval from SEMCOG's Executive Committee after the 45-day public comment period. SEMCOG's public participation process for most SEMCOG plans provide for a 30-day public review period for comments before official approval action is taken. For amendments to SEMCOG's Regional Transportation Plan and Transportation Improvement Plan SEMCOG conducts a minimum 15-day public comment period. The Air Quality Conformity section of the PPP references amendments to the RTP and TIP that may require Air Quality Conformity to also be updated, in which case public participation and comment procedures for amendments will be followed as described in the plan. As currently written in the PPP, the public comment period for projects with air quality conformity impacts is not clear. The Air Quality Conformity section (page 27) of the PPP states "Air Quality Conformity is developed as part of the RTP and TIP updates, in which case public participation and public comment procedures for the RTP and TIP updates will be followed as described in this document. Air Quality Conformity is also updated as required by certain amendments to the RTP or TIP, in which case public participate and comment procedures for amendments to the RTP or TIP will be followed as previously described." Statements such as "described in this document" and "as previously described" are vague requiring the reader to search to different sections of the document and does not provide clarity on the air quality conformity requirements. The Air Quality Conformity section of the PPP should clearly state what the process is for projects that have AQ conformity impacts. Additionally, the chart included on page 26/27 of the PPP states a 15-day public comment period for RTP and TIP amendments without reference to AQ conformity.

Additionally, the "2016 Memorandum of Agreement (MOA) Regarding Determination of Conformity of Transportation Plans, Programs, and Projects to State Implementation Plans" signed by SEMCOG, EGLE, US EPA, FHWA, FTA, and all MPOs in the State of Michigan (including



SEMOG) references the regulations for the public comment period for MTPs and TIPs in a clear way that could be referenced in SEMCOG's PPP.

SEMOG's public participation strategies and tools include increasing awareness and promoting public participation to create a shared vision through two-way interaction by educating, publicizing, listening, and evaluating its public involvement process. These strategies and tools include blogs, data visualization, reaching persons with special needs, SEMCOG's Guide to Transportation Planning in Southeast Michigan, in-person contact, media advisories, new releases, podcasts, project-specific public involvement, community visioning sessions, and several other strategies and tools. Additionally, SEMCOG's PPP includes data from its 2050 Regional Forecast illustrating SEMCOG's efforts to collect community data and mapping of its communities to ensure effective and appropriate decisions for each community.

Regarding the cross-sharing of information amongst government agencies and the public, SEMCOG serves as a regional entity, shares public information for local agencies and MDOT, helps to convene discussions, and provide influence. Federal-Aid Committees (FAC) are county-level organizations, except for the City of Detroit which also has a FAC. SEMCOG works with and provides funding to FACs to help publicize and facilitate public involvement. The public has two avenues for engagement, either through the FAC or through SEMCOG. The more proactive approach is to have public engagement in the FAC stages.

4.1.3 Findings

Recommendations: SEMCOG should more clearly identify the public comment period for amendments with impact to air quality conformity in the PPP.

4.2 Agreements and Inter-Agency Consultation and Coordination

4.2.1 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:

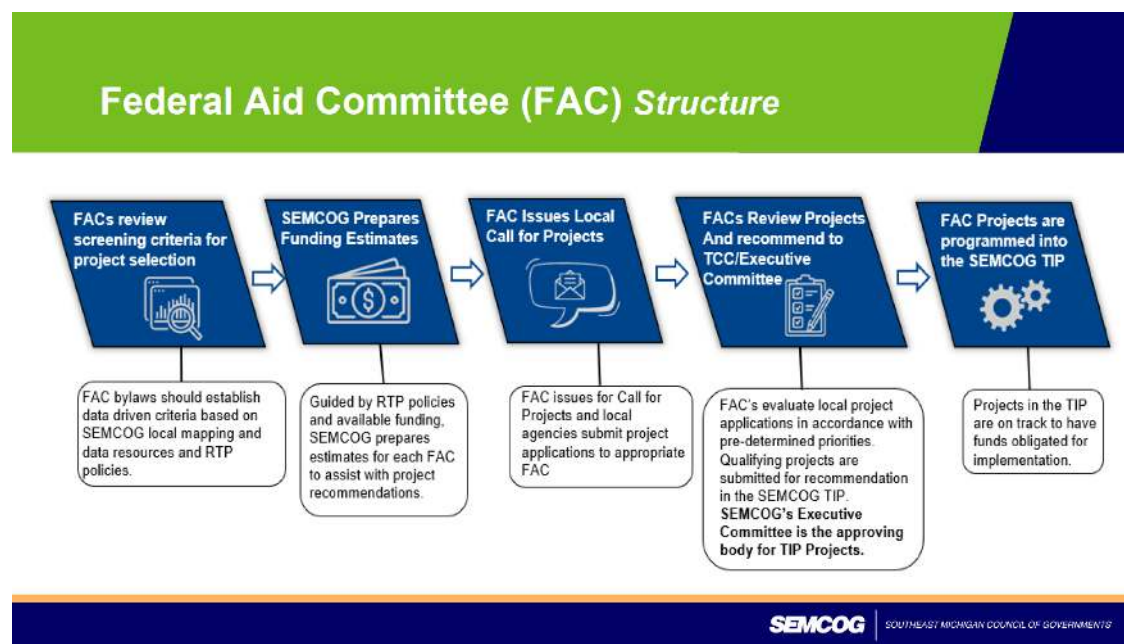
- Agencies and officials responsible for other planning activities (State, local, economic development, environmental protection, airport operations, or freight)
- Other providers of transportation services



- Indian Tribal Government(s)
- Federal land management agencies

4.2.2 Current Status

Believed to be unique in the nation, the Federal-Aid Committees (FACs) were established by SEMCOG to involve the local area governments in the transportation decision-making planning process. There is a FAC in each of the seven counties of SEMCOG and the City of Detroit. The FACs are comprised of representatives of local officials and governments, transit agencies, and MDOT. The FACs function within the local governance structure of the county where they are located and are responsible for prioritizing transportation investments to recommend to SEMCOG technical and policy committees for inclusion in the TIP/MTP.



source: SEMCOG

Since the 2020 Certification Review Recommendation: “SEMCOG should continue with their efforts to raise awareness and provide information on the FACs on their website and in their planning documents”, SEMCOG has worked to implement that recommendation, see Appendix B. The Federal Team (FHWA and FTA certification review participants) recognizes that this effort is on-going, especially regarding website and calendar updates and maintenance.

During the hybrid site visit, FHWA Eastern Federal Lands discussed the importance of SEMCOG coordination with the Federal Land Management Agencies in the region, such as River Raisin National Battlefield Park, and the Detroit River International Wildlife Refuge.

4.2.3 Findings

No Significant Findings



4.3 Metropolitan Transportation Plan

4.3.1 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, 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 five 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

Additionally, 23 U.S.C. 134 was updated by the 2022 Bipartisan Infrastructure Law (BIL) to include Housing Coordination:

“(b) (ii) Coordinate, to the extent practicable, with applicable State and local entities to align the goals of the process with the goals of any comprehensive housing affordability strategies established within the metropolitan planning area pursuant to section 105 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12705) and plans developed under section 5A of the United States Housing Act of 1937 (42 U.S.C. 1437c–1).”



“(c) (i) A metropolitan planning organization serving a transportation management area may develop a housing coordination plan that includes projects and strategies that may be considered in the metropolitan transportation plan of the metropolitan planning organization.”

4.3.2 Current Status








The Southeast Michigan Region is a highly developed and complex region, accounting for roughly 55% of the state’s total population. As such, the regional governance and long-range planning process for the region is equally complex and multi-faceted. As of August 2024, the area’s long-range transportation planning efforts are primarily encapsulated in the SEMCOG 2050 Regional Transportation Plan (2050 RTP)(MTP), the Washtenaw Area Transportation Study (WATS) 2050 Long Range Plan (2050 LRP), and the St. Clair County Transportation Study (SCCOTS) 2045 Long Range Transportation Plan (LRTP).

Given the complexity of this area, and the required multi-faceted approach, there exists a high degree of inter-governmental coordination between SEMCOG and the various Federal Aid Committees (FACs), which includes both WATS and SCCOTS. Each MTP incorporates elements of the other MTP, especially regarding overarching goals, financial constraint, and the investment plan/project list. SEMCOG’s 2050 RTP takes this a step further and incorporates by reference the SCCOTS and WATS MTPs and the RTA’s Transit Master Plan, ensuring a continuity of effort across the region to advance a singular set of goals and strategies for improving the transportation planning process through continuous, comprehensive, and cooperative planning.

SEMCOG and WATS make consistent and exemplary use of visual elements to convey the complex information contained in their MTPs in an easily understood manner. SEMCOG, WATS, and SCCOTS’ MTPs also clearly define their vision, goals, performance measures, and strategies for improving the transportation network throughout the region, while also clearly demonstrating fiscal constraint and a comprehensive list of projects throughout the 20-year planning horizon. SEMCOG, in their 2050 MTP has created a ‘planning hub’ that incorporates all the digital content associated with their plan in a one-stop shop that greatly improves the accessibility of the process for the public.



Southeast Michigan MTP Policy Goals *source: SEMCOG*

Policy	Statement
	Educate and foster collaboration among local governments, transportation agencies, utility providers, and residents to enhance knowledge about and efficiency of the transportation system. (Education)
	Ensure equitable access of the transportation system regardless of age, race, gender, ethnicity, national origin, physical or cognitive ability, or income. (Equity)
	Increase funding and broaden local options to ensure adequate resources and coordination for meeting regional transportation needs to achieve fiscal sustainability. (Funding)
	Use asset management practices, technology, and cost-effective transportation solutions to preserve existing infrastructure. (Preservation)
	Integrate environmental measures into the transportation system to improve community health, air quality, and infrastructure resilience. (Resilience)
	Increase safety for all travelers, regardless of mode. (Safety)
	Promote a thriving regional economy by facilitating seamless movement of goods and services, efficient trade connections, enhancing labor mobility, and fostering tourism and local placemaking. (Shared Prosperity)

SEMCOG, WATS, SCCOTS, and the other FACs have also developed several innovative tools to assist local governments, interest groups, and the population at large with developing more effective transportation plans. Their Southeast Michigan Water Infrastructure Planning Guide helps local public agencies to coordinate construction and infrastructure across agencies, helping to reduce costs and unify efforts to provide residents with the best water, sewer, transportation, and other infrastructure projects available. The Multimodal Tool is another highly effective planning tool that was developed by local staff to assist governments with assessing challenges faced by their transportation network and to improve the safety and efficiency of their roadways through being able to assess design impacts prior to breaking ground. These efforts are examples of the highly innovative approach to transportation planning that is prevalent in the region and have been showcased nationally as best practices.

Also of note, SEMCOG is hosting a PEER exchange in FY25 to assist with their development of a regional freight plan. Regional Freight Plan timeline:



source: SEMCOG



4.3.3 Findings

Commendation: SEMCOG's Vision 2050 RTP Hub is a great practice that allows interested groups to find all materials related to their LRTP in a single and user-friendly location.

SEMCOG has developed innovative tools to assist residents, local governments, and FACs to develop better plans and more effectively implement programs. For example, the Southeast Michigan Water Infrastructure Planning Guide is a highly effective resource that could be adopted nationwide.

WATS 2050 LRTP is an example of clear and concise communication. Their newly adopted plan communicates a complex topic visually and engagingly. This is a commendable practice that should be adopted by other MPOs.

Proposed FHWA/FTA Technical Assistance: Assist SEMCOG and FACs with the development of their regional freight plan.

4.4 Transportation Improvement Program

4.4.1 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.

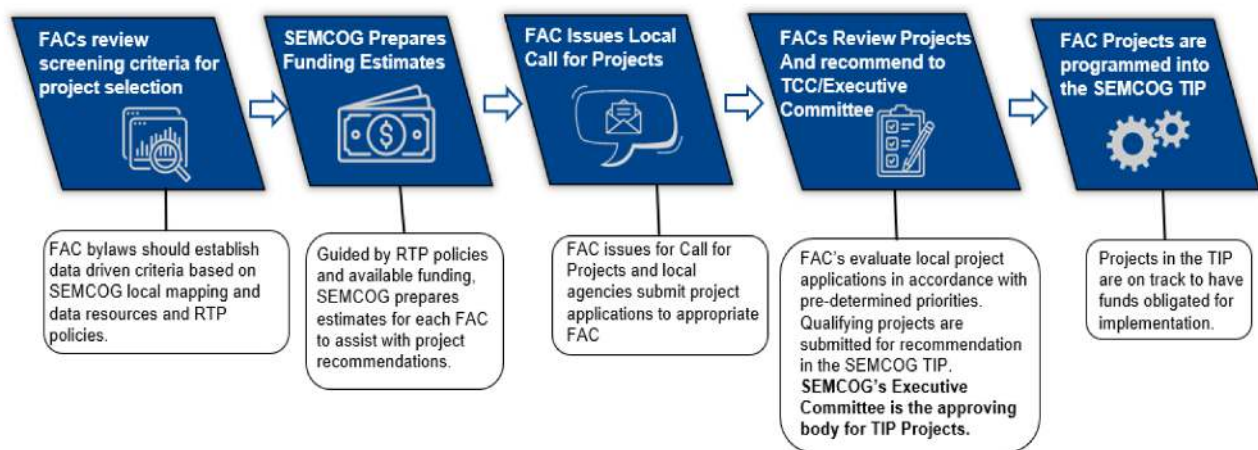
4.4.2 Current Status

The Southeast Michigan Region has a unique structure and approach to transportation planning that requires extensive collaboration across agencies. In this regard, the Transportation Improvement Plans (TIPs) produced by SEMCOG and the FACs are no different. Each FAC hosts its own call for projects, evaluation of project merits, and selection process to recommend



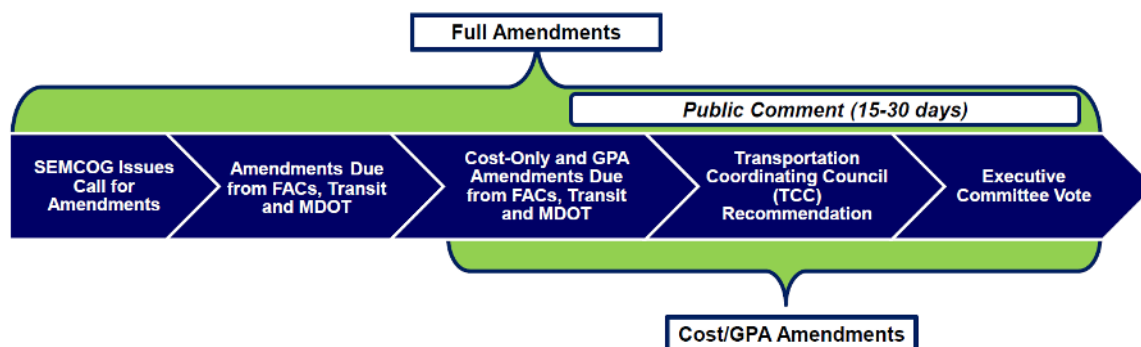
projects for acceptance to the Transportation Coordination Council and the Executive Committee. SEMCOG assists the local governments and FACs with this process and incorporates each FAC's project recommendations to produce one singular TIP for the entire Southeast Michigan Region. Each FAC, SEMCOG, and MDOT enjoy a good working relationship, and as a result, effectively coordinate complex requirements across agencies. The project recommendations from each FAC are reviewed by the Transportation Coordination Council (TCC) and the Executive Committee. Each of these committees meets six times per year and meetings are scheduled one year in advance. Public notice is provided on amendments and opportunities for the public to comment on projects at the TCC and Executive Committee meetings. FAC meetings are also open to the public.

SEMCOG's coordination process with FACs in TIP development *source: SEMCOG*



One highly innovative technique is SEMCOG's process of assigning numerical codes to policies in the MTP and related projects in the TIP to ensure that projects in the TIP are continuing to advance the MTP goals and policies. This provides a method to track progress on these policies at the end of the TIP and MTP and communicate accomplishments and challenges to committees and members of the public.

SEMCOG TIP Amendment Workflow *source: SEMCOG*





One approach that SEMCOG has taken is to allow for an expedited review and approval process of TIP amendments that are only triggered by cost changes. Additionally, SEMCOG has recently reduced the public comment period for these amendment types from 30 days to 15 days. This process should be closely monitored to ensure that it is meeting the needs of committee members as well as members of the public.

SE MI TIP Amendment Schedule source: SEMCOG

Transportation Improvement Program (TIP) Amendment Schedule

- Frequency of amendment periods increased from three to **FIVE**.
 - Three **Full** amendments per year to change:
 - S/TIP Line-Item projects (*projects not under a GPA*) for any reason including cost, scope, etc.
 - GPAs: cost adjustments to GPAs over the 125% threshold
 - Two **Cost-Only** amendments per year limited to changing:
 - S/TIP Line-item projects: cost changes of 25% or more
 - GPAs: Cost adjustments to GPAs over the 125% threshold



4.4.3 Findings

Commendation: SEMCOG has adopted a highly innovative process for linking projects across their required planning documents by assigning a numerical reference system to 'code' projects within their TIP based on 7 overarching policy goals. This ensures links projects back to policy goals in the MTP and other planning documents. This is a commendable practice which will allow the MPO to better track progress made on their goals.

TCC Orientation: How TIP Projects Implement RTP Policies

23/26 TIP Amendment 24-3 (Full) DRAFT Project List
SEMCOG July 10, 2024

Id	Phase	Fiscal Year	County	Responsible Agency	Project Name	Length	Primary Work Type	Project Description	ACC ACC Budget	ACC Priority	Federal Budget	Fund Source	State Budget	Local Budget	Total Phase Cost	Amendment Type	Alt Quality	TIP Cost
23088	2024	2024	Washtenaw	Washtenaw	West Washtenaw Rd	0.25	Reconstruction	Reconstruct 0.25 miles of road, including resurfacing, drainage, and lighting.	\$0	1	\$200,000	2700	\$0	\$200,000	\$200,000	Full	Good	\$0

2050 Vision RTP Policy Codes:

1. Preserve Infrastructure
2. Increase Safety
3. Ensure Equitable Access
4. Promote Shared Prosperity
5. Environmental Resilience
6. Education and Collaboration
7. Increase Funding and Broaden Local Options



source: SEMCOG



Recommendations: The Federal Team recommends SEMCOG, the FACs, and MDOT closely monitor the new 15-day public comment period for cost-change TIP amendments to ensure that this process meets the needs of staff, the MPO committees, and members of the public.

4.5 Unified Planning Work Program

4.5.1 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 Metropolitan Planning Area (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 the sources of funds.

4.5.2 Current Status

Annual Budget: \$20,187,184

Vision & Mission: “All people of Southeast Michigan benefit from a connected, thriving region of small towns, dynamic urban centers, active waterfronts, diverse neighborhoods, premiere educational institutions and abundant agricultural, recreational, and natural areas”.

SEMCOG and their planning partners have a stated mission of supporting and creating:

- Unique places that offer various housing choices for a large and diverse population.
- An educated and trained workforce that supports a multi-sector economy and provides opportunities for all.
- Healthy, clean lakes, streams, air, and a connected system of trails, parks, and natural areas that support recreational and cultural amenities.
- Safe, efficient, and coordinated infrastructure systems that embrace advances in technology and focus on access for all.
- Effective local government and engaged citizenry.

Services & Initiatives: To accomplish this mission, SEMCOG and the FACs concentrate on evaluating and promoting the economic, demographic, and local government fiscal trends to provide context and the need for comprehensive planning and capacity-building.



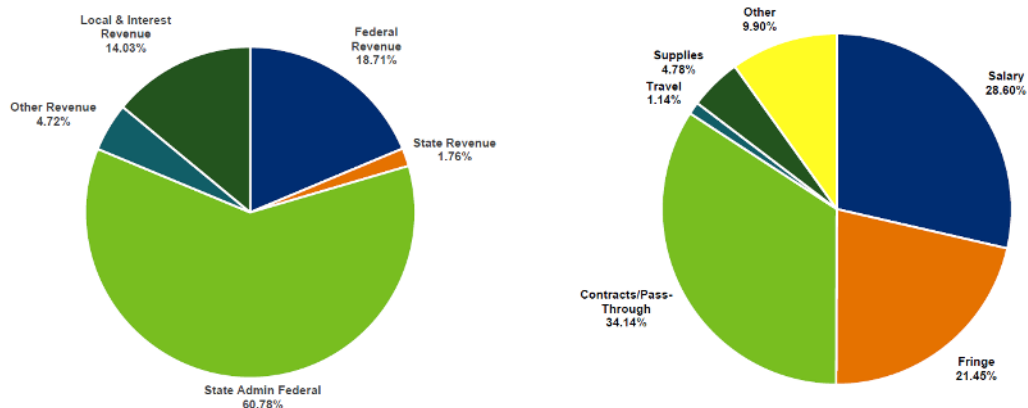
SEMCOG's Comprehensive work program is used to provide technical assistance to local governments, update models, data, and online interactive tools. Additionally, SEMCOG finances several ongoing regional planning projects, including:

- TIP and MTP development
- Economic Development District Committee
- Healthy Climate Plan
- Shared Prosperity Work
- Justice40 Communities Task Force
- Water Resiliency and Flooding
- M-3 PEL and I-94 Modernization
- I-375 Redesign
- I-75/M-102 Interchange Study
- M-1 Corridor Plan

One issue, which SEMCOG and WATS staff highlighted during the hybrid site visit, was the lack of consistency in federal guidelines and reviews related to discretionary grants. Staff at the MPO and State level also expressed concern over the timeliness of Notices of Funding Opportunity (NOFO) releases, and the significant time and resources devoted to applying to grants, which might not ever be received. We acknowledge this frustration, and propose that our division staff, where possible, assist to highlight these concerns to provide MPOs with timelier and more accurate NOFOs to HQ and decision makers for the various grant programs administered by the Agency. A clearer and more consistent NOFO process, grant application evaluation process, and grant administration process will help to reduce the financial and time burden placed on MPOs and local agencies that are pursuing and managing these funds.

SEMCOG's UPWP 2024-2025 Budget *source: SEMCOG*

Revenues/Expenses - \$20,187,184





4.5.3 Findings

Commendation: SEMCOG's online interactive tools such as the Flood Risk Tool and the Building Footprint Tool are highly innovative, providing examples that can be shared nationally to assist other MPOs in developing planning assistance products.

4.6 Transit Planning

4.6.1 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.

4.6.2 Current Status

The Regional Transit Authority of Southeast Michigan (RTA) continues to provide transportation service in the Detroit metropolitan area along with the eight fixed route transit providers: Detroit Transportation Corporation People Mover, Ann Arbor Area Transportation Authority, Blue Water Area Transit, Detroit Department of Transportation, Lake Erie Transit, Suburban Mobility Authority for Regional Transportation, University of Michigan, and M1 Rail. Residents and visitors rely upon these transit services to access education, employment, health care, and entertainment. As part of their responsibilities for transportation planning for the entire region, SEMCOG has a role in transit planning and related coordination for areas not covered by the RTA. The RTA facilitates discussions with the transit providers which has allowed for collaboration and better regional transit integration.

SEMCOG assists regional transit providers and other partners through data, technical assistance, grant development, and education initiatives. SEMCOG collaborates with the transit providers to meet the performance-based planning requirements regarding the required agreements and establishing performance measures and targets. This is done by reviewing and incorporating information from the transit agencies Transit Asset Management (TAM) plan and Public Transit Agency Safety Plan (PTASP). In February of 2024 SEMCOG's Executive Committee approved the regional transit asset and safety targets.

Since the last certification review the following items are of note:

RTA: The leadership transition is now complete with an Executive Director, Planning and Innovation Director and Grant Manager among other positions that are RTA employees, no longer contracted positions. The RTA is overseeing two pilot projects to close transit gaps using



flex funds. These include the D2A2 Service – Detroit to Downtown Ann Arbor express bus and DAX Bus express bus from Downtown Detroit to the Airport. Thus far these two pilot services are proving successful. The Mobility Wallet is another pilot RTA is spearheading to allow for shared payment system of multiple public transportation options. RTA is in discussions to assume operations of the M-1 Rail/QLINE service by 2025 from the non-profit, which was always envisioned. SEMCOG and RTA continue to share office space which has allowed for continued close collaboration among staff. RTA is responsible for preparation of the coordinated human services transportation plan ‘OnHand’ for the region and the Section 5310 call for projects. As the designated recipient responsibilities include the annual split letters of FTA formula funds coordinating the Detroit and Ann Arbor urbanized areas. RTA is gathering information on how existing funding is being spent and monitoring activity. Other responsibilities of RTA are planning studies, including the Regional Transit Master Plan (RTMP) that guides transit priorities in the four-county region done in close coordination with the transit providers. The RTMP feeds into the MTP, known locally as the RTP (Regional Transportation Plan).

DDOT: DDOT leadership has changed since the last certification review. With new leadership Phase 2 of the Service Restoration Plan is underway including the hiring of bus drivers to increase service to pre-pandemic levels by January 2025. The paratransit service operation has been moved in-house rather than being provided by a contractor, and ridership has been steadily increasing due to improvement in the quality and reliability of service with a pilot program of same-day service anticipated in Q4 2024. Other activities include expansion of the MoGo bikeshare system; completion of NEPA for the demolition and reconstruction of the Coolidge Bus Garage, NEPA and construction for the adaptive reuse of the state fairgrounds as the Jason Hargrove Transit Center near the Amazon and Meijer distribution centers.



Photos: Jason Hargrove Transit Center and FTA and Detroit/DDOT leadership with the \$30.8M Low or No Emissions Discretionary Grant Award for continuation to clean energy vehicles



SMART: In November of 2022, Oakland County passed the first county wide transit millage. The funds are being divided between multiple entities, including SMART, Western Oakland Transportation Authority (WOTA), North Oakland Transportation Authority (NOTA), and the Older Persons Commission. Oakland County keeps a portion of the funds for administrative costs related to the distribution of the funds. Oakland County, not SMART, also determines the funding levels of each transit provider in the County. SMART has begun expanding bus service.



Photo: SMART Bus Wrap

SMART has been creative with attracting and retaining bus operators including bus wraps highlighting drivers and different individuals in the community and in transit. The photo here highlights women in transit and planning in the Detroit area and beyond on a national scale.

AAATA The Ride: In 2022 Ann Arbor, Ypsilanti and Ypsilanti Township approved the Ann Arbor Area Transportation Authority's millage, taking effect in 2024 will triple the current budget and



Image: Proposed Ypsilanti Transit Station concept

allow for expanded service, increased frequency an Ann Arbor/Ypsilanti express service and additional capital projects. NEPA/Section 106 consultation is underway for the Ypsilanti Transit Station which received congressional directed funds. AAATA also received a \$25M low no emission grant from FTA to purchase hydrogen fuel cell and low-emission diesel-electric hybrid buses replacing diesel buses.

DTC the Detroit People Mover: The People Mover is offering fare free rides in 2024 due to private sponsorship. Leadership hopes to continue this program in the future due to success in ridership and interest from private sponsors. DTC is also engaged in a larger citywide plan for



downtown Detroit as downtown is becoming a neighborhood with residents. As part of the downtown mobility plan the People Mover could be re-imagined. DTC also purchased refurbished people mover rail cars and parts from Toronto using local funds.

4.6.3 Findings

Recommendation: a) The Federal Team recommends SEMCOG work with RTA to further develop its role as the designated recipient of the federal transit funds. That role means that RTA has responsibility for federal transit funds above direct recipients. The Federal Team believes this would help support our mutual interest in receiving and tracking uniform



information on the use and prioritization of federal transit funds once they are programmed to direct recipients.

b) The Federal Team recommends SEMCOG and RTA continue to develop the FAC prioritization process to continue to clearly align RTP priorities for project selection with the projects ultimately programmed in the TIP. The Federal Team recommends that SEMCOG review all flexible federal funds to determine the eligibility and utility of those funds to assist in advance transit goals in the RTP. SEMCOG and RTA should continue working together on corridor studies and other planning studies like the Thriving Communities.

4.7 Equity

4.7.1 Regulatory Basis

In 2021 FHWA/FTA issued the [Planning Emphasis Area](#) on *Equity and Justice*⁴⁰ in *Transportation Planning* to support Executive Order 13985 (Advancing Racial Equity and Support for Underserved Communities) and Executive Order 14008 (Tackling the Climate Crisis at Home and Abroad). These EOs provide a whole of government approach to advancing environmental justice by setting the target for 40 percent of Federal investments to flow to disadvantaged communities.

4.7.2 Current Status

The Federal Team reviewed how equity is being integrated into the transportation planning process at SEMCOG by reviewing the organizational structure and federal transportation planning documents (Regional Transportation Plan (RTP), Unified Planning Work Program (UPWP), Public Participation Plan (PPP), and Transportation Improvement Program (TIP))

Organizational Structure

SEMCOG, issued a statement of commitment to Diversity Equity & Inclusion which was signed by all SEMCOG council members on June 9th, 2020¹. This was in response to the racial and social injustices toward people of color that took place at the time and in recognition of long-standing practices of injustices within the region in the planning, decision making, and implementation of transportation projects and transportation investments. With this

¹ [Statement from SEMCOG leadership \(informz.net\)](#)



statement SEMCOG aims to change the way that business is conducted regarding equity and the transportation planning process.

Prior to the EOs SEMCOG already had an existing structure to meet requirements for Title VI which includes considering Environmental Justice communities. After 2021, SEMCOG created the Justice 40 Communities Task Force² to further activities to address the needs of Environmental Justice communities through the transportation planning process. The Task Force is given the charge to:

1. Provide input and guidance into the development of regional plans and initiatives.
2. Highlight best practices and successful projects in their communities and identify mutually shared opportunities and challenges.
3. Provide assistance on current processes for public input and engagement into the development of the regional plans and initiatives.
4. Provide guidance to increase technical assistance opportunities and grant applications from Justice40 communities.
5. Provide feedback on SEMCOG educational programs (e.g., Walk. Bike. Drive. Safe, One Water, etc.), SEMCOG University workshop topics, and other programs (e.g., Experience Southeast Michigan). [and]
6. Increase engagement with SEMCOG, leading to increased representation of Justice40 communities on SEMCOG boards, committees, and task forces.

The task force meets every few months to engage in activities that “ensure all voices and communities are heard in regional planning and initiatives, and that support is provided to communities in their path to prosperity environmental justice communities were provided opportunities” and that Justice40 targets were being addressed.

Regional Transportation Plan

In *Vision 2050*, SEMCOG’s Regional Transportation Plan, equity is one of the seven policies used to shape actions, strategies, and project selection to meet regional goals. Throughout the document equity is integrated in to planning for transit, resiliency, safety, bicycle and pedestrian mobility, and freight. Vision 2050 also dedicates a chapter on Equity in Transportation where it provides an overview of the regional analysis on equity and how SEMCOG aims to ensure that environmental justice communities have access to jobs, education, healthcare, and other core services. To address the needs of disparate communities through the lens of equity SEMCOG considered land use and transportation, housing, access to core services, broadband, and Justice40.

² [Background of SEMCOG's Justice40Communities](#)



The RTP used the Access to Core Services report in Southeast Michigan, adopted in 2016 to developed common measures of accessibility for comparison across the region, established benchmarks to identify gaps and challenges where accessibility is low, and set regional policies and local actions to be implemented by various stakeholders. The report measured and evaluated accessibility to understand how well the region's transportation system provides access to core services across four modes of travel (automobile, transit, walking, and bicycling). The core services measured were jobs, health care facilities (including hospitals, community health centers, and urgent care facilities), supermarkets, public parks, schools, libraries, and fixed-route transit.

Data and Modeling

The MPO enhanced the commercial vehicle and transit components of its trip-based Travel Demand Forecast Model that was used for a variety of analysis for the RTP, including EJ analysis to ensure there were equitable benefits and no disproportionately high and adverse impacts on populations from transportation investments. SEMCOG's non-motorized accessibility analysis evaluates how well transportation infrastructure serves travel demands at the local or neighborhood levels. It focuses on walking and biking trips to essential core service destinations for everyone, and in particular for EJ population. The accessibility analysis in 2045 RTP supplements EJ analysis with a complete set of non-motorized accessibility indicators for both 2015 and 2045³.

SEMCOG uses a land use simulation model (UrbanSim) to simulate land development for future years in the seven-county region. The output from the model is parcel level socioeconomic data including households by type, jobs by type, and land use by type for all future years. The parcel output data is aggregated to TAZs and the results are used as inputs of SEMCOG's travel demand model and the EJ analysis⁴. SEMCOG analyzes transportation investments by populations group and geographically overlays the selected population groups by TAZ.⁵

Unified Planning Working Program, Public Participation Plan, and Transportation Improvement Program

There are several initiatives SEMCOG includes in the UPWP on how the MPO has outlined certain responsibilities to ensure that the process and outcomes of the transportation planning process neither unfairly deprive any person of benefit, nor create undue burden on protected groups (based on race, color, national origin, sex, age, creed, or disability).

³ Page 164 of RTP

⁴ Page 38 of Appendix C EJ Tech Analysis.

⁵ The details of SEMCOG's methodology are described on Page 46-62 of Appendix C EJ Tech Analysis.



Through the implementation of a climate action plan, SEMCOG ensures all people are considered for and benefit from the outcomes of the action plan with an emphasis on Low-income and Disadvantaged communities (LIDACs). SEMCOG will also be performing stakeholder outreach and community engagement for this action plan.⁶ Funds are included in the UPWP to manage the Regional Transportation Plan (RTP) and implement the TIP. Activities include public participation for the RTP and TIP and identifying trends and priorities including the integration of equity analysis and Justice 40 (J40) prioritized.⁷ Additionally, funds are included in the UPWP to develop, maintain, and apply tools for EJ, environmental sensitivity analysis, equity and J40 planning⁸.

To meet the requirements of a Title VI analyses SEMCOG utilizes household surveys pairing them with potential affects from the recipient's programs and activities. The activity involves designing, collecting, processing, and analyzing household travel survey data to understand travel patterns and update the travel demand models, improve EJ analysis and support planning activities⁹. Also, UPWP includes line item for data collection, management, and distribution. Funding of this activity will produce demographic data, population estimates, socio-economic data inputs for the travel demand model.

UPWP includes funding to increase the capacity of local governments and partner organized to maintain and update the Equity Emphasis areas tool and promote the integration of equity and J40 in transportation planning. The MPO will be integrating the Bipartisan Infrastructure Law planning factors into travel and tourism and J40 into planning activities. Additionally, the activity to increase capacity of local governments includes the engagement and coordination of planning initiative through the J40 communities task force¹⁰.

SEMCOG has laid the groundwork to integrate equity into the region's transportation planning process through existing practices to meet Title VI requirements and address the needs of Environmental Justice communities. SEMCOG has adopted additional measures to advance equity considerations in transportation planning by expanding their organizational structure with the Justice 40 Communities Task Force, laying the foundation for continued quantitative equity analysis through the new Southeast Michigan Equity Emphasis Areas Tool and the Environmental Justice Technical Analysis which is produced alongside the TIP, and other reports and plans that addresses equity in transportation planning. Additionally, Vision 2050,

⁶ Page 21 of UPWP.

⁷ Page 26 of the UPWP.

⁸ Page 27 of UPWP.

⁹ Page 13 of UPWP.

¹⁰ Page 41 of UPWP.



SEMOG's Regional Transportation Plan, equity is well integrated into the narrative of the document.

During the certification review SEMCOG asked many questions on how to meaningfully integrate equity and serve to address social justice. The Justice 40 Communities Task Force, development of community profiles, quantitative equity analysis data and tools SEMCOG created and uses are commendable initiative. SEMCOG is eager to further advance equity in the transportation planning process and is seeking opportunities to increase their capacity and ability to reach out to the EJ population, restore neighborhoods, increase access opportunities, and capture qualitative data to truly meet the community's needs.

4.7.3 Findings

Commendation: SEMCOG uses multiple quantitative measures that address impacts to minority and low-income populations. SEMCOG applies a suite of quantitative tools to provide equity analysis for their RTP and TIP through the Environmental Justice Technical Analysis, including their Travel Demand Model, land use simulation model (Urban SIM), the new Southeast Michigan Equity Emphasis Areas Tool, GIS, and other methods.

Recommendations: a) The federal team recommends adding qualitative information to the EJ analysis such as public participation comments, neighborhood stories from residents, and historic information on neighborhoods that were negatively impacted by highway infrastructure projects. Currently, the EJ analysis focuses on quantitative data. However, the MPO also collects good qualitative information from the household surveys.

b) The Federal Team encourages SEMCOG to continue exploring activities and methods that further the goals of integrating equity in the transportation planning process through training and peer events with other MPOs with advanced practices in equity. Opportunities are available through the FHWA and FTA Peer Program - Transportation Planning Capacity Building Program ([dot.gov](https://www.dot.gov)) and the National Highway Institute.

4.8 Civil Rights

4.8.1 Regulatory Basis

Title VI of the Civil Rights Act of 1964, prohibits discrimination based on race, color, or national origin. Specifically, 42 U.S.C. § 2000(d) 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". Additionally, there are other statutes that provide legal protection against discrimination such as: the Federal Aid Highway Act of 1973 (23 U.S.C. § 324), the Age Discrimination Act of 1975, the Rehabilitation Act of 1973 (29 U.S.C. §794) (Section 504), and



the Americans with Disabilities Act (ADA) of 1990. The ADA specifies that all programs, services, and activities undertaken by public entities regardless of the source of the funding, are prohibited from discrimination based solely on an individual's disability.

Executive Order (EO) 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 (EJ populations). USDOT and FHWA issued orders to establish policies and procedures for addressing environmental justice in minority and low-income populations to comply with this EO. Federal planning regulations in 23 C.F.R. §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. FTA Circular 4703.1 provides guidance to FTA grant recipients on how to fully engage environmental justice populations in the public transportation decision-making process and how to measure, minimize, or mitigate potential impacts on EJ populations.

EO 13166 addresses Limited-English-Proficiency (LEP) and requires agencies to ensure that those limited in English proficiency can meaningfully access services provided without unduly burdening the fundamental mission of each federal agency.

Under the ADA (28 CFR § 35.105) and Section 504 (49 CFR § 27.11), public entities must ensure that all programs, activities, and services are examined to identify barriers to access for persons with disabilities. States and municipalities are required by Section 504 and by the ADA to complete a self-evaluation and an ADA transition plan. The self-evaluation is an inventory of an entity's facilities (e.g., sidewalks, curb ramps, and detectable warnings) that identifies barriers in policies (e.g., public meetings in inaccessible locations), programs (e.g., sidewalks and curb ramps that are either inaccessible to persons with disabilities, or missing), and other activities or services that prevent access for those with disabilities.

4.8.2 Current Status

Title VI of the Civil Rights Act of 1964 (Title VI)

The SEMCOG Title VI Non-Discrimination Plan can be obtained through the Title VI link available towards the bottom of the SEMCOG webpage. SEMCOG's Title VI webpages are provided in English, Spanish, and Arabic and contain its Title VI Non-Discrimination Plan, Title VI Coordinator information, LEP Plan, and Complaint Form in each language. The webpage is readily accessible for members of the public to locate and review the SEMCOG's Title VI Non-Discrimination Plan, identify the SEMCOG's point of contact for discrimination concerns, and review the complaint form and process. SEMCOG's translated documents allows members of the public to review these already translated documents without the need to request translation. This makes it convenient for members of the public to access and improves the transparency of SEMCOG's Title VI Program.



SEMOG's Title VI Non-Discrimination Plan includes current assurances and a non-discrimination policy statement signed by its executive director. SEMOG's plan lays out its structure, goals related to Title VI, commitment to data collection and analysis, and annual reporting to MDOT. Furthermore, the plan references its LEP and Public Participation plans.

The current Title VI Complaint form is provided on the Title VI webpage as a link separate from its Title VI Non-Discrimination Plan and is readily available in English, Spanish, and Arabic. This allows members of the public to conveniently obtain and submit the form.

Executive Order (EO) 13166 (Limited English Proficiency)

The current SEMOG LEP Plan lays out the four factor criteria it uses to determine the appropriate language assistance needs of its planning area, identifies how it will provide notice to LEP persons, its continued monitoring and commitment to updating its LEP Plan, its LEP complaint procedures, and additional ways to access its LEP Plan. SEMOG's LEP Plan is readily available on its Title VI webpages in English, Spanish, and Arabic.

SEMOG takes into consideration its size and the concentration of LEP individuals in its service area to determine its proposed actions to meet the needs of LEP individuals that may encounter its programs. The plan lays out actions for communicating with members of the public through writing, over the phone, or in office and resources used to better serve LEP individuals through the distribution of "I-Speak" language identifications cards to its employees for use, and use of the Translators Resource List provided by MDOT. SEMOG also provides regular Title VI and LEP training for new team members and department heads and at times as a refresher course for employees. SEMOG is currently discussing the possibility of including this training in its annual training schedule.

Americans with Disabilities Act of 1990 Requirements (ADA) and Section 504

At the time of the hybrid site visit, the SEMOG website contained an accessibility link, providing notice of website accessibility and SEMOG's commitment to providing information to the general public in other formats separate from the website. SEMOG's Executive Committee and General Assembly meetings are open to the public and include notice of interpretation, translation, and signage services at public meetings upon request as outlined in its PPP. There was no reference to specific accommodations that can be made for residents that may require additional accommodations such as welcoming a service animal in offices or public meeting spaces, providing documents in Braille, and other ways of ensuring that people with disabilities have an equal opportunity to enjoy all SEMOG's programs, services, and activities. The Federal Team recommended including additional information, ADA Coordinator contact, public notice, and grievance procedures related to ADA and accessibility to help reduce barriers that disabled individuals may face in participating.

While SEMOG did not have procedures for filing a discrimination complaint based on disability, members of the general public may, at any time, submit a complaint of discrimination



by email, phone, or in person. SEMCOG's Title VI Complaint Form included disability as an alleged discrimination option. It was suggested during the hybrid site visit that a complaint of discrimination on the basis of disability be separate from Title VI. The ADA provides protections for persons with disabilities while Title VI does not. This will help eliminate confusion and ensure complaints from members of the public are addressed appropriately.

During the hybrid site visit, SEMCOG indicated that it has explored what its ADA self-evaluation would be and what it would look like. SEMCOG requested additional resources from the Federal Team to assist with meeting this requirement. SEMCOG uses resources available through MDOT.

After the hybrid site visit and prior to the completion of this report, the SEMCOG has been actively working to meet its obligations under the ADA and Section 504 of the Rehabilitation Act of 1973. The SEMCOG has updated its ADA/Accessibility webpage to include a notice of nondiscrimination and has added a nondiscrimination statement for viewing on its lobby monitor. Furthermore, SEMCOG has designated an ADA Coordinator and adopted an ADA grievance/complaint procedure, both of which have been published publicly on its ADA/Accessibility webpage. This ADA/Accessibility webpage can be accessed through the ADA/Accessibility hyperlink on SEMCOG's main webpage.

SEMCOG provided the Federal Team with its' Draft Self-Evaluation and Transition Plan and is actively evaluating all its programs, services, and activities. This evaluation includes the identification of universal access barriers and descriptions of the methods to remove the barriers. However, it is unclear what accessibility standard was used to identify the barriers. The draft plan included a timeline for public comment and the Executive Board's approval of the plan. SEMCOG is committed to securing board approval of its' Self-Evaluation and Transition Plan by early 2025 to comply with the Americans with Disabilities Act (ADA) of 1990/Section 504 of the Rehabilitation Act of 1973. **4.8.3 Findings**

Commendation: The SEMCOG Title VI links found on the home page of the SEMCOG website are readily available in English, Spanish, and Arabic without the need for members of the public to request Spanish or Arabic translation. Each link directs you to a Title VI webpage that contains Title VI information, LEP Plan, Title VI Complaint Form, and the Title VI Non-Discrimination Plan in the language selected.

Recommendations: a) The Federal team strongly recommends that SEMCOG adhere to its current schedule to complete a comprehensive self-evaluation and transition plan, including a schedule for taking steps necessary to achieve compliance, by early 2025. Additionally, it is imperative that SEMCOG consult with interested persons, including persons with a disability and organizations representing persons with a disability, as required per 49 CFR 27.11 (c)(2) and 28 CFR 35.105 (b) and (c).

b) The Federal Team recommends SEMCOG provide Title VI and ADA non-discrimination training to its employees to further improve its implementation of these programs.



c) The Federal Team recommends that SEMCOG remove *disability* from its Title VI Complaint Form to prevent confusion since complaints of discrimination based on disability are addressed through ADA. This will provide a clearer process for handling Title VI complaints or ADA complaints

d) The Federal Team recommends SEMCOG make its Public Participation Plan readily available in English, Spanish, and Arabic. SEMCOG's Title VI Non-Discrimination Plan and LEP Plan is available in English, Spanish, and Arabic. Currently both the LEP and PPP are referenced in SEMCOG's Title VI Non-Discrimination Plan, however the PPP is available only in English and would require LEP individuals to request a translated copy.

Proposed FHWA/FTA Technical Assistance: An example document - [Self-Evaluation and Transition Plan: Title II of the Americans with Disabilities Act of 1990 Section 504 of the Rehabilitation Act of 1973 \(capitalmpo.org\)](#)

4.9 Performance-Based Planning and Programming

4.9.1 Regulatory Basis

23 USC §150 (b), 23 CFR §450.340 and 450.306 stipulate requirements for the use of performance-based planning and programming (PBPP) in project development and selection. MPO(s), State(s), and the providers of public transportation shall jointly agree upon and develop specific written provisions for cooperatively developing and sharing information related to transportation performance data, the selection of performance targets, the reporting of performance targets, the reporting of performance to be used in tracking progress toward attainment of critical outcomes. PBPP applies performance management principles to transportation system policy and investment decisions, providing a link between management and long-range decisions about policies and investments that an agency makes in its transportation system. PBPP is a system-level, data-driven process to identify strategies and investments.

Performance-based planning and programming involves integrating performance management concepts into the existing federally required transportation planning and programming processes. PBPP involves using data to support long-range and short-range investment decision-making. It generally starts with a vision and goals for the transportation system, selection of performance measures, and use of data and analysis tools to inform development of investment priorities, which are then carried forward into shorter-term investment planning and programming. PBPP should involve a range of activities and products undertaken by a transportation agency, working together with other agencies, stakeholders, and the public, as part of a 3C (cooperative, continuing, and comprehensive) process.



23 USC §150 (b) and 23 CFR §340 require state DOTs and MPOs to develop goals and objectives through setting data-based and measurable performance targets. They are then required to measure progress toward these targets as part of the 3c planning process and establish a mechanism for reporting on their progress.

4.9.2 Current Status

SEMOG has long incorporated a multi-disciplinary performance-based planning approach far before it was required by Federal legislation (MAP-21, 2012) for transportation decision-making to achieve national transportation goals. The requirements for MPOs and State DOTs to maintain a performance-based transportation planning approach has been continued under the current transportation funding law, the Infrastructure Investment and Jobs Act (IIJA) of 2021.

SEMOG continues to work with MDOT, transit agencies, the MPO technical and policy committees, and other planning partners in developing and refining performance measures and making the connection between the project prioritization and selection process and performance-based planning and programming. SEMOG takes intentional and consistent steps year over year to measure how projects in the TIP and MTP are achieving the identified outcomes and investment goals.

SEMOG effectively tracks, monitors, and evaluates the federally required performance measure areas which include:

- Safety
- Pavement & Bridge Condition
- System Performance: National Highway System (NHS) Reliability, Interstate Freight Reliability, Congestion Mitigation and Air Quality (CMAQ)
- Transit Performance: Transit Asset Condition & Transit Safety

In addition to the federal required performance measures, SEMOG also tracks data for these areas:

- Reliable, Quality, Infrastructure
- Desirable Communities
- Access to Services, Jobs, Markets, and Amenities
- Healthy, Attractive Environmental Assets
- Economic Prosperity

Safety

MDOT establishes annual statewide safety targets after consultation and coordination with regional planning organizations throughout the State. Until recently, SEMOG's committees have elected to adopt the State's annual targets. Committee members have been vocal about the importance of safety and have had discussions about encouraging MDOT to establish more aspirational targets.



In January 2023, SEMCOG's Executive Committee adopted their own developed regional safety targets. This is the first time an MPO in Michigan created their own safety measures instead of utilizing MDOT's. SEMCOG's targets were developed in partnership with their Transportation Safety Task Force, Transportation Safety Action Committee, Transportation Coordinating Council, and other regional stakeholders. With the goal of being both data driven and aspirational in nature, they focused on the priority of a zero deaths and serious injuries by 2050 goal. Details regarding the establishment of the safety targets can be found in the Southeast Michigan Transportation Safety Plan.

Related, SEMCOG and MDOT developed the [Multimodal Tool](#) to assist communities in Southeast Michigan with determining modal priorities for streets and evaluating how current and planned designs work for all road users -whether they walk, bike, drive, ride transit or move freight. In keeping with the PBPP mandate the tool uses quantitative, research-backed multimodal performance measures that expand the breadth of transportation analysis beyond the traditional measures of vehicular level of service and delay. By enabling stakeholders to design and evaluate streets for all users, the Multimodal Tool helps agencies understand how they can better address competing needs for each mode, often in limited available space.

This tool connects directly with SEMCOG's vision zero approach and is an important implementation resource for ensuring communities in the region work to apply a Safe System Approach to their planning and design of infrastructure. The Multimodal Tool integrates FHWA's Proven Safety Countermeasures which allows planning practitioners, elected officials, and members of the public to utilize the tool to weigh different design options when making decisions that best address the most vulnerable road users.

The Multimodal Tool is at the heart of complete streets and the Safe System approach, including safe speeds. As with every tool, it must be used within the scope it was intended and applied appropriately. SEMCOG has done an impressive job explaining how it should be used and has created a resource that is a national best practice.

4.9.3 Findings

Commendation: SEMCOG and MDOT are commended on the development and implementation of the Multimodal Tool which is a national best practice to help communities apply a Safe System Approach to their transportation planning programming and connection between the project development and selection process to performance-based planning and programming.

5.0 CONCLUSION

In conclusion, FHWA and FTA determined that the metropolitan transportation planning process conducted in the Southeast Michigan metropolitan area meets Federal planning requirements.



APPENDIX A - PARTICIPANTS

The following individuals were involved in the certification review and the hybrid site visit.

- Andrew Sibold, FHWA MI Division
- Christina Nicholaides, FHWA MI Division
- Jenny Staroska, FHWA MI Division
- PaHoua Schroeder, FHWA MI Division
- Andy Pickard, FHWA MI Division
- Joseph Agyemang, FHWA MI Division
- Mack Frost, FHWA HQ
- Maria Hayford, FHWA HQ
- Lindsay Donnellon, FHWA HQ
- Lewis Grimm, FHWA EFL
- Richelle Ellis, FHWA EFL
- Anthony Greep, FTA Region 5
- Andrew Kiefaber, FTA Region 5
- Susan Weber, FTA Region 5
- Richard Bayus, MDOT
- Don Mayle, MDOT
- Daniela Kavajian, MDOT
- Lindsey Dowswell, MDOT
- Kathryn Beck, MDOT
- James VonSteel, MDOT
- Craig Newell, MDOT
- Matthew Galbraith, MDOT
- Meredith Fryer, MDOT
- Deanna Donahoo, MDOT OPT
- Michele Fedorowicz, SEMCOG
- Kelly Karll, SEMCOG
- Stephen Brudzinski, SEMCOG
- Ally Racisz, SEMCOG
- Beheshteh Makari, SEMCOG
- Sayeed Mallick, SEMCOG
- Trevor Layton, SEMCOG
- Jilian Chen, SEMCOG
- Misty Jordan, SEMCOG
- Brian Pawlik, SEMCOG



- Amy O’Leary, SEMCOG
- Alex Bourgeau, SEMCOG
- Kevin Vettraino, SEMCOG
- Chris Williams, SEMCOG
- Rachel Barlock, SEMCOG
- Ryan Buck, WATS
- Lindsay Wallace, SCCOTS
- Peter Klomparens, SCCOTS
- Ben Stupka, RTA
- Jordan VonZynda, SMART
- Andy Thorner, SMART
- Michael Staley, DDOT
- Stephanie Davis, DDOT
- Riki Yamakura, DDOT
- Raymond Hess, AAATA The Ride
- Irvin Wyche, Macomb County Department of Roads
- Scott Wanagat, Macomb County Department of Roads



APPENDIX B - STATUS OF FINDINGS FROM 2020 REVIEW

This section identifies the findings from the previous certification review and summarizes how those findings have been addressed.

The response below was received from SEMCOG July 12, 2024:

In response to the recommendations that were presented in the 2020 Certification review we are providing the following status memo. We are happy to discuss further the progress that SEMCOG and our local partners have made to address the recommendations that were noted in the review four years ago. We wanted to be able to frame these changes in advance of our scheduled certification and allow the opportunity for follow-up questions on July 23rd and 24th.

2020 FHWA/FTA Recommendations

- *SEMCOG should continue with their efforts to raise awareness and provide information on the FACs on their website and in their planning documents.*
- *As use of the new STIP software evolves, partners should continue to work together to create a TIP listing report which meets the needs of the MPOs and applicable Federal requirements.*

2024 Status of Recommendations

- **SEMCOG should continue with their efforts to raise awareness and provide information on the FACs on their website and in their planning documents.**

The Federal-Aid Committees (FACs) were established by SEMCOG to involve the local area governments in the transportation decision-making planning process. There is a FAC in each of the seven counties of SEMCOG and the City of Detroit. The FACs are comprised of representatives of local officials and governments, transit agencies, and MDOT. The FACs function within the local governance structure of the county where they are located and are responsible for prioritizing transportation investments to recommend to SEMCOG. The FACs play an important role within the SEMCOG planning process in the selection and recommendation of projects from their counties into the Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP).

As noted in the 2020 Recertification review the “Federal-Aid Committee” term and structure is unique to Southeast Michigan and is not found in Federal regulations. Public involvement is required as part of the planning process per 23 CFR 450.210. The FACs play an important role in meeting state and regional targets related to performance-based planning regulations. Regionally, we see this decentralized process as advantageous to the local and public input process because it allows for more voices within the process and allows for local



partners and the public to engage more directly with their local offices, without traveling to other areas within our seven-county region.

The local involvement inherent to each FAC acts as a pre-step or a subcommittee to the SEMCOG technical committee, the Transportation Coordination Council (TCC), and the SEMCOG policy committee, the Executive Committee. The final vote for approval for the RTP and TIP projects is conducted through the Executive Committee. This process allows three opportunities for involvement for local projects. The TCC and Executive Committee provide the robust regional dialogue needed for the regional policies, actions, and prioritization criteria.

Over the last four years, SEMCOG has worked closely with each FAC to ensure that the individual bylaws, meeting minutes, upcoming meetings and agendas are housed on their FAC webpages or our SEMCOG FAC webpage. To continue efforts of raising awareness, SEMCOG has hosted multiple educational sessions outlining the background of transportation planning and funding in the region. SEMCOG recently updated the Guide to Transportation Planning, which explains the transportation planning process in the region, for the FAC committee members and public. SEMCOG has also recently created a *FAC Staff Guidebook* to provide a comprehensive detail of the FAC administrative role and programming best practices. Additionally, we have also been working with FACs on developing and signing updated Memorandums of Understanding which outline the roles and responsibilities for SEMCOG and the FACs for greater collaboration and partnership across the region, including project prioritization and federal transportation performance measure review.

SEMCOG has also worked with the FAC staff over the past year through a series of meetings with our TIP Development Committee to review improvements to safety and other prioritization criteria across the region. These meetings allowed FAC staff to collaborate, learn and share ideas. Meetings offer opportunities for continuing regional cooperation on a variety of topics including infrastructure coordination, equity, and project delivery. SEMCOG continues to work with the FACs to ensure transparency in project selection and within the entirety of the transportation process.

- **As use of the new STIP software evolves, partners should continue to work together to create a TIP listing report which meets the needs of the MPOs and applicable Federal requirements.**

As noted via the recommendation 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 provide at least four years of projects and contain costs, funding sources, responsible agencies. These lists must be provided to interested parties with a reasonable timeframe and the ability to comment. SEMCOG's Public Participation Plan addresses these requirements for TIP transparency and dissemination.

MDOT and SEMCOG utilize JobNet to submit TIP documents and amendments via the JobNet system. These processes were well on their way to being established through the last recertification. Four years later, these processes are utilized for every TIP amendment and the overall development of the TIP list.



This process is very uniform throughout the state and allows for improvements in project flow and ease of TIP delivery. The TIP list, produced and exported from JobNet allows for uniformity on a month-to-month basis.

SEMCOG and MDOT were able to implement two additional cost only and GPA amendments that allow five opportunities for project changes to move forward, in comparison to the three that existed previously.



APPENDIX C – PUBLIC COMMENTS

No public comments were received during the public comment opportunity period.

There was opportunity for public involvement & comments:

1. during the TTC meeting on July 18, 2024, and
2. during the hybrid on-site meetings July 23 & July 24, 2024, and
3. on the MPO websites & social media accounts, and
4. sent by email to their contacts list.

Copy of notice sent to SEMCOG, WATS, and SCCOTS staff on July 12, 2024



U.S. Department
Of Transportation

Federal Highway Administration
315 W. Allegan Street, Room 201
Lansing, MI 48933

Federal Transit Administration
200 W. Adams Street, Suite 320
Chicago, IL 60606

We want to hear from you!
Tell us your thoughts on the transportation planning process in Southeastern Michigan
as part of the Transportation Planning Federal Certification Review

Your input is requested! An opportunity is available to comment on the transportation planning process in the Southeast Michigan region. This is part of a review that will assess compliance with Federal regulations related to the transportation planning process conducted by the Southeast Michigan Council of Governments (SEMCOG), the Michigan Department of Transportation (MDOT), the St. Clair County Transportation Study (SCCOTS), the Washtenaw Area Transportation Study (WATS), public transportation providers, and local and regional units of government in the area. We look forward to hearing from you!

Written comments will be accepted until August 25, 2024. Two virtual meetings will be held on 23-24 July (9:30am – 3:30pm):

Dial in by phone 509-931-1572

Phone conference ID: 371 219 922#

Address comments to:

Susan Weber
Federal Transit Administration, Region V
200 West Adams Street, Suite 320
Chicago, IL 60606
e-mail: Susan.Weber@dot.gov

or

Andrew Sibold
Federal Highway Administration, Michigan Division
315 West Allegan Street, Room 201
Lansing, MI 48933
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APPENDIX D - LIST OF ACRONYMS

AAATA: Ann Arbor Area Transportation Authority - The Ride
ADA: Americans with Disabilities Act
BIL: Bipartisan Infrastructure Law
CAA: Clean Air Act
CAC: Citizen Advisory Committee
CFR: Code of Federal Regulations
CMP: Congestion Management Process
CO: Carbon Monoxide
COA: Comprehensive Operational Analysis (Transit)
DDOT: Detroit Department of Transportation
DOT: Department of Transportation
EJ: Environmental Justice
FAC: Federal Aid Committee
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
IJA: Infrastructure Investment and Jobs Act (see BIL)
LEP: Limited-English-Proficiency
MAP-21: Moving Ahead for Progress in the 21st Century
MDOT: Michigan Department of Transportation
MPA: Metropolitan Planning Area
MPO: Metropolitan Planning Organization
MTP: Metropolitan Transportation Plan/ Regional Transportation Plan
MTPA: Michigan Transportation Planning Association
NAAQS: National Ambient Air Quality Standards
NO₂: Nitrogen Dioxide
O₃: Ozone
PBPP: Performance Based Planning and Programming
PPP: Public Participation Plan
PTASP: Public Transportation Agency Safety Plan
PM₁₀ and PM_{2.5}: Particulate Matter
RTA: Regional Transit Authority
RTP: Regional Transportation Plan/ Metropolitan Transportation Plan
SCCOTS: St. Clair County Transportation Study
SEMCOG: Southeast Michigan Council of Governments
SHSP: Strategic Highway Safety Plan
SMART: Suburban Mobility Authority for Regional Transportation
STIP: State Transportation Improvement Program



TAM: Transit Asset Management
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
VPI: Virtual Public Involvement
WATS: Washtenaw Area Transportation Study





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