



U.S. Department
of Transportation

Transportation Management Area Planning Certification Review

Federal Highway
Administration

Federal Transit
Administration

Southeastern Wisconsin Regional Planning Commission Federal Certification Review



August 25-26, 2020

Summary Report





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1.0 EXECUTIVE SUMMARY

On August 25-26, 2020, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted a certification review of the planning process for the Southeastern Wisconsin Regional Planning Commission (SEWRPC). 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. The review was scheduled during the COVID-19 pandemic and, to ensure the safety of the participants and the public, was conducted virtually using MS Teams and GoToMeeting computer platforms for the “onsite” discussions and public meeting. The FTA and FHWA have determined that the SEWRPC planning process meets and exceeds Federal planning requirements.



1.1 Previous Findings and Disposition

The previous Certification Review for SEWRPC was conducted in 2016 and made several recommendations and commended several of SEWRPC's practices. There were no corrective actions needed in 2016. A summary of the recommendations and their disposition are summarized below.

Review Area	Action	Corrective Actions/ Recommendations	Disposition
Unified Planning Work Program 23 CFR 450.308	Recommendation	SEWRPC should consider including a visual timeline of all tasks identified in the Unified Planning Work Program (UPWP), similar to the Regional Land Use and Transportation Plan Schedule found in Appendix I of SEWRPC's 2016 Overall Work Program (OWP). Such a timeline could serve to differentiate between projects that are ongoing through the year and repeat on an annual basis, and those that are limited in duration with a defined endpoint.	Beginning with the 2017 OWP, SEWRPC has included a visual timeline of all projects included in the OWP.



Review Area	Action	Corrective Actions/ Recommendations	Disposition
Transit Planning 49 U.S.C. 5303 23 U.S.C. 134 23 CFR 450.314	Recommendation	<p>SEWRPC is encouraged to continue working closely with the City of Milwaukee and Milwaukee County Transit System (MCTS) as they explore transit oriented development (TOD) opportunities associated with both the Milwaukee Streetcar and the East-West Bus Rapid Transit (BRT) project currently in development under FTA’s Capital Investment Grant (CIG) program. SEWRPC’s experiences in developing <i>VISION 2050</i> can be used to help guide project funding and corridor prioritization decisions that are made by transit operators in a manner that is transparent and accessible to the riding public. While notifying the public of transit service decisions (expansions or reductions) are primarily the responsibility of the transit operators, SEWRPC’s public involvement process and website appear to be an effective mechanism to garner input on transit service needs in the different jurisdictions.</p> <p>SEWRPC should continue working with the transit operators and local advisory committees to formally identify jurisdictional challenges that limit effective, compatible, and coordinated transit service. A comprehensive updating of the seven Coordination Plans or an effort independent of and more immediate than the Transit Development Plan updates may be warranted to address the current connectivity of transit services problem. Through the Vision 2050 document, SEWRPC touched on regional consequences of not having a vibrant and adequately funded transit system. A closer look at the local consequences of inadequate transit service may be warranted as well.</p>	<p>SEWRPC will continue to work with and provide support to the City of Milwaukee and Milwaukee County to help capitalize on their recently completed, underway, and future fixed-guideway investments by assisting with the implementation of TOD consistent with VISION 2050.</p> <p>As part of the 2020 update to the Public Transit Human Services Coordination Plans, SEWRPC will hold a Regional Meeting, inviting all seven Counties to participate, to facilitate intercounty coordination of gaps and transit service improvements. As an advisory agency, SEWRPC works to facilitate interagency communication as transit services are developed. SEWRPC, when asked, meets with local technical staffs and elected officials to help coordinate transit planning efforts, but cannot mandate certain actions be taken. For more than a decade SEWRPC has been outspoken on the issue of transit funding, the need for dedicated funding for transit, and the impacts inadequate funding of transit will have on the Region’s transit dependent users. SEWRPC documents this analysis (EJ Analysis) in an appendix to the RTP and Transportation Improvement Program (TIP).</p>



Review Area	Action	Corrective Actions/ Recommendations	Disposition
<p>Transportation Improvement Program 23 U.S.C. 134(c)(h) & (j) 23 CFR 450.326</p>	<p>Recommendation</p>	<p>SEWRPC should create a more visual presentation of TIP amendment criteria. A table or matrix that details certain dollar or percentage change thresholds would help explain the differences between amendments requiring formal review and administrative modifications.</p> <p>SEWRPC should evaluate its current amendment and administrative modification criteria and determine if it applies equally and clearly to both highway and transit projects. Consideration should be given to defining the criteria for amendments for transit projects if it is found that the current criteria is not commonly understood by transit operators or the public.</p> <p>Consideration should also be given to creating a more visual presentation of the various funding programs and the scoring/selection criteria within each program where applicable. The same formatting consideration should be given to federal funding sources subject to transfer between highway and transit programs.</p> <p>A cooperative agreement between SEWRPC, FHWA, FTA, transit operators and the State should be considered to examine if a new approach should be taken to apply criteria such as a cap rate or percentage changes in highway and transit projects for amendments and administrative modifications.</p>	<p>Beginning with the 2017-2020 TIP, SEWRPC first developed a table (Table 1) that summarizes the criterion used to determine what constitutes a major or minor amendment or an administrative modification, and the level of public involvement associated with each type of TIP change. When the 2019-2022 TIP was developed, this table was replaced with a figure (Figure 2) to improve the visual presentation of the types of TIP changes.</p> <p>Regarding the amendment and administrative modification process, SEWRPC established a cost threshold to delineate between administrative modifications, minor amendments, and major amendments, which was included in Figure 2 described above.</p> <p>Regarding the visualization of the Federal funding selection processes, there has been considerable volatility in the policies and practices implementing the programs that SEWRPC is involved in since 2016, which impacted each program's selection process. This uncertainty inhibited the development of a visualization of the selection processes utilized by funding source. As a first step, SEWRPC has improved the description of the project selection process within the TIP and this is included as Figure 1 of the TIP. As part of the development of the 2021-2024 TIP, Commission staff will attempt to visualize the selection processes for funding sources where SEWRPC is involved in project selection, such as the STBG, CMAQ, and TAP funding programs.</p> <p>Prior to developing Figure 2, described above, there would occasionally be questions about the process required for changing or including projects in the TIP. Since</p>



Review Area	Action	Corrective Actions/ Recommendations	Disposition
			<p>creating this figure, which was approved by the TIP advisory committees having representation from FHWA, FTA, transit operators, and the State, these questions have been drastically reduced. Currently, Commission staff's opinion is that including the TIP change process in a cooperative agreement is unnecessary. Should issues rise in the future, Commission staff will look to different methods of clarifying the process.</p>
<p>Public Participation 23 U.S.C. 134(i)(6) 23 CFR 450.315 & 450.326(b)</p>	<p>Recommendation</p>	<p>SEWRPC is encouraged to consider implementing the following recommendations:</p> <ul style="list-style-type: none"> • Clarify roles and responsibilities for transit related public involvement • Continue building on established task forces and community group relationships • Consider You-Tube shorts to present information • Include consultation process in the Public Participation Plan (PPP) • Include groups specifically listed in planning regulations (23 CFR 415.316) for TIP consultation in the PPP 	<p>SEWRPC has clarified the language in the TIP and in public notices to specifically note that the TIP public involvement process satisfies the Program of Projects' public involvement requirements for the listed transit operators, in accordance with Chapter 53 of Title 49, United States Code, and the current metropolitan and statewide planning regulations.</p> <p>SEWRPC's task forces are intended to meet on an ad hoc basis as topical issues arise. The Environmental Justice Task Force (EJTF), in particular, has been meeting on a near quarterly basis to discuss how various elements of SEWRPC's work should consider or may impact Environmental Justice Groups. SEWRPC has used this Task Force to help identify community groups and organizations that SEWRPC should coordinate with. Additionally, SEWRPC has continued its relationships with the 8 (now 9) community partners and SEWRPC's Public Involvement and Outreach Division has worked to improve relationships with 100+ other community groups.</p> <p>To date, SEWRPC created a YouTube Channel and posted a VISION 2050 video presentation during the Governor's 2020 "Safer-at-Home" order. SEWRPC is considering how we</p>



Review Area	Action	Corrective Actions/ Recommendations	Disposition
			<p>might continue to use this channel as another method to improve our public involvement process.</p> <p>SEWRPC's PPP was updated in 2016/2017: www.sewrpc.org/involvement. The consultation process was updated at that time as well and is included as Appendix B to the PPP.</p> <p>With regard to the groups specifically listed in 23 CFR 450, SEWRPC's consultation process was updated, along with the PPP, to include discussion on how SEWRPC—through its interactions with the 9 partner organizations, Advisory committees, and task forces involves all of the different interests prescribed in the regulations in its planning processes. The consultation process is now attached to the PPP as Appendix B.</p>
<p>Freight Planning 23 U.S.C. 134(h) 23 CFR 450.306</p>	<p>Recommendation</p>	<p>SEWRPC should work closely with WisDOT to incorporate the statewide freight plan into relevant planning efforts. As part of this effort, the MPO should identify and consider specific major freight corridors in its Regional Transportation Plan (RTP).</p>	<p>Commission staff has worked closely with the Wisconsin Department of Transportation (WisDOT) staff to ensure that the relevant recommendations are included in the RTP. In particular, VISION 2050 recommends a multimodal freight transportation system designed to provide for the efficient and safe movement of raw materials and finished products to, from, and within Southeastern Wisconsin. To achieve this goal, VISION 2050 recommends improvements to the Region's transportation infrastructure as well as intergovernmental cooperation and other actions to preserve key transportation corridors, address regulatory inefficiencies, meet trucking industry workforce needs, and increase transportation safety and security. Many of these recommendations serve to implement or support the State's Freight Plan completed in 2018. WisDOT completed the Wisconsin State Freight Plan in April 2018, which</p>



Review Area	Action	Corrective Actions/ Recommendations	Disposition
			<p>includes information on many of the topics included in VISION 2050 freight recommendations, as well as a prioritized list of freight projects that could potentially be eligible for newly established NHFP funding. As of November 2019, none of the projects identified in the State Freight Plan are located in Southeastern Wisconsin.</p> <p>In accordance with the FAST Act, SEWRPC, in consultation with WisDOT, designated Critical Urban Freight Corridors (CUFCs) for the Milwaukee urbanized area in 2019. Similarly, WisDOT, in consultation with SEWRPC, designated CUFCs and Critical Rural Freight Corridors (CRFCs) in the Region's other urbanized and non-urbanized areas. As part of designating the CUFCs, Commission staff evaluated: segments of WisDOT's Primary and Secondary Highway Freight Corridors not on the National Highway Freight Network (NHFN); oversize/overweight (OSOW) routes serving Port Milwaukee; truck volume, tonnage, and value data provided by WisDOT; and locations of major industrial areas in the Region.</p> <p>SEWRPC's Executive Director and/or Chief Transportation Engineer (alternate) attend and participate in WisDOT's Freight Advisory Committee as the AWRPC representative.</p> <p>Additionally, from 2014 through 2018, SEWRPC participated in an OSOW Working Group coordinated by WisDOT. The Working Group included representatives from WisDOT, SEWRPC, the Cities of West Allis and Milwaukee (including Port Milwaukee staff), and the private sector. Through the Working Group's efforts, a set of privately funded infrastructure improvements to facilitate OSOW shipments along a key OSOW route connecting the City of West Allis and</p>



Review Area	Action	Corrective Actions/ Recommendations	Disposition
			Port of Milwaukee was identified. In addition, a Wisconsin State Statute was enacted that prohibits any future actions that would make any portion of this OSOW route unavailable for use by a truck transporting a load up to 28-feet wide and 23-feet high. SEWRPC will continue to remain responsive and will continue to provide support to the Region's freight needs into the future.
Air Quality 42 U.S.C. 7401 40 CFR Part 93 23 CFR 450.324(m)	Recommendation	The WisDOT Southeast Region Office should consider participation in the quarterly Transportation Conformity Workgroup meetings to improve transparency in terms of upcoming projects and allow consideration of air quality impacts by the various agencies and identification of additional information or analysis needed during project development process.	Since the 2016 certification review, the WisDOT Southeast Region has sent a representative to participate in the quarterly Transportation Conformity Workgroup meetings.



<p>Congestion Management Process / Management and Operations 23 U.S.C. 134(k)(3) 23 CFR 450.322</p>	<p>Recommendation</p>	<p>SEWRPC is encouraged to consider implementing the following recommendations:</p> <ul style="list-style-type: none"> • Update congestion management process (CMP) following VISION 2050. • Reorient the CMP documentation as a stand-alone guiding document establishing the CMP process, performance measures and recommended CMP strategies (Transportation System Management (TSM), Transportation Demand Management (TDM), etc.) that will be considered in all transportation planning efforts. • Quantify the expected impact of the various strategies or family of strategies in terms of the overall CMP performance measures. • Use the Regional Transportation Operations Plan (RTOP) in prioritizing STBG funding. • Produce an annual evaluation of CMP strategies implemented. • Conduct field evaluations of implemented CMP strategies to determine their impact on congestion 	<p>SEWRPC’s updated CMP will be completed at the end July 2020. This CMP will document the process used by SEWRPC to develop all of its transportation plans. The impact of the recommended CMP strategies identified during the development of the long-range land use and transportation plan is quantified through various comparisons of the Vision and fiscally constrained transportation system (FCTS) to current trends and a baseline. SEWRPC’s transportation plans have long recommended capacity improvements only after the impact of the congestion management elements (bicycle/pedestrian, transit, TDM, and TSM) have been considered and their impact on congestion quantified.</p> <p>Once the CMP is complete and the new TIP is developed, Commission staff will work with SEWRPC’s advisory committees to develop a RTOP that will include a prioritization of TSM and TDM projects recommended in the long-range plan but not already included in the TIP. This prioritized list could then be used to help prioritize TSM and TDM projects that are submitted to the Federal funding programs where SEWRPC is involved in project selection, such as CMAQ, STBG, and TAP.</p> <p>SEWRPC, as part of its annual performance report, will include an analysis of the effectiveness of implemented congestion management strategies. This information will be based on data either collected by, available to, or purchased by SEWRPC (traffic counts, NPMRDS, INRIX). The analysis will likely rely heavily on the obligated projects list and TIP to identify projects that are near completion or have been implemented.</p>
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1.2 Summary of Current Findings

The current review found that the metropolitan transportation planning process conducted by SEWRPC meets and exceeds Federal planning requirements.

As a result of this review, FHWA and FTA are certifying the transportation planning process conducted by Wisconsin Department of Transportation (WisDOT), SEWRPC and public transportation operators. There are recommendations in this report that warrant close attention as well as areas that MPO is performing very well in that are to be commended.

Review Area	Action	Recommendations/ Commendations
Metropolitan Planning Area Boundaries 23 U.S.C. 134(e) 23 CFR 450.312(a)	None	
MPO Structure and Agreements 23 U.S.C. 134(d) 23 CFR 450.314(a)	None	
Unified Planning Work Program 23 CFR 450.308	None	
Metropolitan Transportation Plan 23 U.S.C. 134(c),(h)&(i) 23 CFR 450.324	None	
Transit Planning 49 U.S.C. 5303 23 U.S.C. 134 23 CFR 450.314	Commendation	The Federal Review Team commends SEWRPC on its commitment to promoting transit planning in the region. Transit providers within the Milwaukee urbanized area, and throughout seven county area value SEWRPC’s technical assistance in developing transit plans, and other transit related studies and projects.
Transportation Improvement Program 23 U.S.C. 134(c)(h)& (j) 23 CFR 450.326	None	
Public Participation 23 U.S.C. 134(i)(6) 23 CFR 450.316 & 450.326(b)	Recommendation	Consider incorporating into SEWRPC’s public involvement plan virtual public involvement techniques utilized during the pandemic.
Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324, Age Discrimination Act, Sec. 504 Rehabilitation Act, Americans with Disabilities Act	Recommendation	Determine degree of ADA transition plan compliance amongst member jurisdictions and provide assistance, as needed, to jurisdictions needing to develop an ADA transition plan. Recommend expanding self-certification statement by providing examples of activities that indicate compliance with the various laws (see example in Appendix B).



Review Area	Action	Recommendations/ Commendations
Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324, Age Discrimination Act, Sec. 504 Rehabilitation Act, Americans with Disabilities Act	Commendation	The Federal Review Team commends SEWRPC on the depth of its equity analysis, including the recognition of the impacts of the region's segregation problem and inadequate transit funding, and its development of equity project selection criteria.
Consultation and Coordination 23 U.S.C. 134(g) & (i) 23 CFR 450.316, 23 CFR 450.324(g)	Commendation	The Federal Review Team commends SEWRPC on its successful efforts to work collaboratively with all of its planning partners and community groups. Most noteworthy are SEWRPC's relationship with and high commitment to aiding transit agencies and its collaborative efforts to develop PM3 transportation performance measures and targets with its planning partners.
List of Obligated Projects 23 U.S.C. 134(j)(7) 23 CFR 450.334	None	
Freight 23 U.S.C. 134(h) 23 CFR 450.306	None	
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	None	
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)	None	
Transportation Security Planning 23 U.S.C. 134(h)(1)(C) 23 CFR 450.306(a)(3) 23 CFR 450.306(d) 23 CFR 450.324(h)	None	
Nonmotorized Planning 23 U.S.C. 134(h) 23 U.S.C. 217(g) 23 CFR 450.306 23 CFR 450.3224f)(2)	None	
Integration of Land Use and Transportation 23 U.S.C. 134(g)(3) 23 U.S.C. 134 (h)(1)(E) 23 CFR 450.306(a)(5)	None	



Review Area	Action	Recommendations/ Commendations
Travel Demand Forecasting 23 CFR 450.324(f)(1)	None	
Air Quality Clean Air Act 42 U.S.C. 7401 40 CFR Part 93 23 CFR 450.324(m)	Recommendation	Recommend SEWRPC consolidate and expand its discussion of climate change and greenhouse gas emissions during the next update of Vision 2050. Consider adopting specific metrics and targets.
Congestion Management Process / Management and Operations 23 U.S.C. 134(k)(3) 23 CFR 450.322	None	

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 certification reviews usually 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 FTA/FHWA Certification Review guidelines provide agency field reviewers with latitude and flexibility to tailor the review to reflect regional issues and needs. As a consequence, 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 findings of the entire oversight effort.

The SEWRPC review process was individually tailored to focus on topics of significance in the region. The planning areas addressed during this review were established using a risk-based approach in discussions between SEWRPC, WisDOT and the Federal Review Team. To ensure the safety of all participants and the public during the ongoing COVID-19 pandemic, the review was held virtually using MS TEAMS and GoToMeeting computer platforms for the “onsite” discussions and the public meeting. The Federal Review Team thanks all the participants for their collaboration to successfully conduct the review virtually.



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.

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.

SEWRPC is the designated MPO for the urbanized areas of Milwaukee, Racine, West Bend, Kenosha, and a portion of Round Lake Beach-McHenry, Grayslake IL. Two of the urbanized areas within Southeastern Wisconsin are designated as transportation management areas (the Milwaukee and Round Lake Beach-McHenry, Grayslake IL urbanized areas). SEWRPC's metropolitan planning area (MPA) includes all of Kenosha, Milwaukee, Ozaukee, Racine, Washington, and Waukesha Counties, and parts of Dodge, Jefferson, and Walworth Counties, with the City of Milwaukee as the largest population center. WisDOT is the responsible State agency and 10 public agencies are responsible for the operation of public transportation within the MPA. Current membership of the SEWRPC MPO consists of elected officials and citizens from the political jurisdictions in the seven-county region consisting of Kenosha, Milwaukee, Ozaukee, Racine, Walworth, Washington, and Waukesha 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

This certification review covers the transportation planning process conducted cooperatively by the SEWRPC, WisDOT, and public transportation operators. Key findings and recommendations are summarized in the body of this report for the following subject areas selected by SEWRPC, WisDOT, FHWA and FTA staff for on-site review:

- Metropolitan Transportation Plan (MTP)
- Transit Planning



- Public Participation
- Civil Rights (Title VI, EJ, LEP, ADA)
- Freight Planning
- Transportation Safety & Security
- Nonmotorized Planning
- Travel Demand Forecasting
- Air Quality
- Congestion Management Process / Management and Operations
- Transportation Performance Management
- Financial Planning

3.2 Documents Reviewed

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

- SEWRPC and WisDOT et al Cooperative Agreement (2018)
- Overall Work Program - 2020 Southeastern Wisconsin Regional Planning Commission
- Vision 2050: A Regional Land Use and Transportation Plan (2020 Update)
- A Transportation Improvement Program for Southeastern Wisconsin: 2019-2022
- SEWRPC Regional Transportation Operations Plan for Southeastern Wisconsin: 2012-2016 (Memorandum Report No. 202)
- SEWRPC Workforce Mobility Team brochure.
- SEWRPC website: <https://www.sewrpc.org/SEWRPC.htm>
- SEWRPC Title VI Plan
- Environmental Justice Task Force Charter
- Vision 2050 Appendix B: Review of Targets for National Performance Measures
- Southeastern Wisconsin Regional Planning Commission 2018 Annual Report
- Congestion Management Process for Southeastern Wisconsin (Memorandum Report No. 203, 2nd Edition)
- Regional Transit Planning Council: 2019 Annual Report
- CMAP/SEWRPC/IDOT/WisDOT Cooperative Agreement
- 2012 MOA Regarding Transportation Quality Conformity for Plans, Programs and Projects To State Implementation Plans
- SEWRPC Public Participation Plan (2017)
- SEWRPC Public Involvement and Outreach Accomplishments (2016)
- SEWRPC Public Involvement Quantitative Evaluation (2019)
- SEWRPC Organizational Structure (2016)



- 2019 SEWRPC Primary Organizations Contact List Approved by the Environmental Justice Task Force
- Milwaukee Dockless Scooter Pilot Study
- Milwaukee Adaptive Bike Share System Pilot



4.0 PROGRAM REVIEW

4.1 Metropolitan Transportation Plan

4.1.1 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 (i) 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

4.1.2 Findings

SEWRPC completed an interim review and update of its Vision 2050 transportation plan in June 2020. Vision 2050 was originally adopted in 2016 and utilized scenario planning and performance measures to develop recommendations for land use and



transportation. SEWRPC also made two sets of transportation recommendations: one based on needs or desired outcomes and the other based on anticipated financial resources and referred to as the fiscally constrained transportation system (FCTS). This practice continued with the 2020 update. Following the development of these plans performance measures are monitored at a frequency based on the availability of data—annually as reported in the SEWRPC’s annual report, every four years as part of an interim review and update of a plan, or every ten years as part of the major update to the plan to coincide with the decennial U.S. Census and the Region travel survey conducted by SEWRPC.

The most recent update did not result in major changes in SEWRPC’s planning assumptions or outlook. Some of the notable results and future activities include:

- While Vision 2050 recommends more than doubling of transit service to significantly improve transit access, there is a substantial funding gap between the recommendations and what is contained in the FCTS. SEWRPC concludes that the underfunding of transit will have a disparate impact on minorities and low-income populations. SEWRPC continues to be outspoken on the issue of transit funding, the need for dedicated funding for transit, and the impacts inadequate funding of transit will have on the Region’s transit dependent users.
- Vision 2050 recommends addition of eight rapid transit lines, four commuter rail lines, and significantly expanded local bus, express bus, commuter bus, and shared-ride taxi services
- Vision 2050 recommends a series of programs be considered to improve access to suburban employment centers, including: vanpool programs; partnerships with transportation network companies such as Uber or Lyft; pedestrian facility enhancements; and job access programs.
- A Workforce Mobility Team was created in July 2018 through a collaboration between SEWRPC and the Regional Transit Leadership Council. The Workforce Mobility Team provides assistance to employers in the Region who experience challenges retaining and attracting workers as a result of those workers having limited or no commuting transportation options available.
- Report #221 is a comparison of SEWRPC on a number of metrics to other comparable MPOs in the Midwest and nationally. This is the second edition and it has been useful for local decision-makers. This report provides a statistical comparison of the Milwaukee metropolitan area with 14 other metro areas in the Midwest and 14 other metro areas throughout the nation. Data comparisons include educational attainment, racial/ethnic disparities, per capita income, housing, travel to work, congestion, public transportation, etc. The report is updated with each plan update.



<https://www.sewrpc.org/SEWRPCFiles/Publications/mr/mr-221-2nd-ed-comparison-milwaukee-area-to-peers.pdf>

- SEWRPC updated its equity analyses. The Milwaukee area has greater differences than nearly all metro areas with respect to the inequities between white and minority population education, per capita income, and poverty. Disparities between the City of Milwaukee and the rest of the Milwaukee area in terms of educational attainment, per capita income, and poverty exceed the central city-suburban disparities in other metropolitan areas.
- Flooding vulnerability analysis will be part of a future Vision 2050 update or as a stand-alone report.
- Work has begun on a regional food system plan for Southeastern Wisconsin. The plan is recommended by VISION 2050, which recognizes a need to improve access to healthy foods for all residents, especially for low-income residents of the Region's "food deserts." The plan will present information about the components of the Region's food system, including the food that is being produced, how it is being distributed, and who is consuming it. Recommendations will be developed to increase food access; reduce economic and health disparities; support locally owned farms; preserve productive agricultural land and sensitive natural resources; and better connect those who produce, distribute, and consume the Region's food.

Recommendations:

None.

4.2 Transit Planning

4.2.1 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.

4.2.2 Findings

SEWRPC continues to serve as an important resource for public transportation in the region. There are four designated recipients for FTA funding within the Milwaukee urbanized area: Milwaukee, Ozaukee, Washington, and Waukesha Counties. The City of Milwaukee receives Congestion Mitigation and Air Quality (CMAQ) funds for operations of The Hop Streetcar. SEWRPC assists with the call for projects, TIP development, distribution of transit formula



funding, and the preparation of Transit Development Plans (TDPs). TDPs evaluate current transit service, future transit needs, and recommended transit improvements to meet future needs. SEWRPC last completed a TDP for Milwaukee County in 2010, Ozaukee County in 2018, Washington County in 2015, and Waukesha County in 2013. SEWRPC is currently working with Waukesha County in developing a new TDP. Milwaukee County will work with SEWRPC to begin work on a new TDP in the near future.

SEWRPC is involved in many transit projects and initiatives including traffic signal prioritization that is a component of the City of Milwaukee's Streetcar service and will be part of Milwaukee County's future East-West Bus Rapid Transit (BRT) service. SEWRPC contributes to transit orientated development planning around future streetcar expansion in the City of Milwaukee, and establishing bus rapid transit (BRT) dedicated busways, transit enhancements along Blue Mound Road in Waukesha County, and other ongoing and future transit studies.

SEWRPC serves on the Executive Committee of the Regional Transit Leadership Council (RTLTC). Founded in 2016, the RTLTC unites public and private sector leaders from throughout the seven county Southeastern Wisconsin region around strategies and actions to connect the region with robust multi-modal transportation options. In partnership with SEWRPC, RTLTC's Workforce Mobility Initiative engages directly with employers and business groups to address workforce mobility challenges and devise solutions to connect workers to jobs. RTLTC acts as a convener and facilitator, working to advance projects that will directly solve immediate mobility challenges.

SEWRPC and RTLTC formed the Workforce Mobility Team (WMT) in 2018 to assist employers in identifying ways to better connect workers to jobs. The WMT created a website (<https://www.sewrpc.org/SEWRPC/Transportation/Workforce-Mobility-Team.htm>) with workforce mobility resources. Potential strategies can be sponsored by a single employer, a group of employers or a public-private partnership.

The COVID-19 Pandemic has affected transit providers throughout the region. At certain times during the pandemic, many of the transit providers either temporarily shut down service and/or provided free service due to safety concerns. Transit service has also been modified to account for changing commuting patterns and social distancing requirements. Transit continues as a viable transportation option through the pandemic. Transit providers are following mask wearing requirements and local and state directives to protect the safety of the transit riders and employees.

Recommendations:

None

Commendation:



The Federal Review Team commends SEWRPC on its commitment to promoting transit planning in the region. Transit providers within the Milwaukee urbanized area, and throughout seven county area value SEWRPC's technical assistance in developing transit plans, and other transit related studies and projects.

4.3 Public Participation

4.3.1 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.

4.3.2 Findings

SEWRPC continues to engage in comprehensive and diverse public involvement activities. In the 2016 Federal Certification Review, SEWRPC received a commendation for its public involvements efforts. Below is a brief summary of the current review's public involvement findings:

- In 2016, a review and update of the SEWRPC's public involvement process was completed.
- SEWRPC has identified nine community partners to work with that represent or work closely with low-income communities, minority communities, or people with disabilities. Currently, these partners include Common Ground of Southeastern Wisconsin, Ethnically Diverse Business Coalition, Hmong American Friendship Association, Independence *First*, Milwaukee Urban League, Renew Environmental Public Health



Advocates, Inc., Southside Organizing Committee, Urban Economic Development Association of Wisconsin, and Urban League of Racine and Kenosha.

- SEWRPC has a formal distribution list of approximately 100 organizations. Approximately 53 of the organizations have been identified as primary organizations and a focus of targeted outreach efforts. The list of primary organizations is reviewed annually by the Environmental Justice Task Force.
- Moving forward, SEWRPC is looking to enhance its social media presence (e.g. Facebook, YouTube, Twitter). In addition, based on the lessons learned using virtual platforms for meetings and public involvement during the COVID-19 pandemic, SEWRPC anticipates developing a hybrid public participation approach which enhances its current practices with virtual methods.
- SEWRPC used the GoToMeeting platform to conduct its public involvement efforts associated with the recent update of the Vision 2050 plan.
- Outreach to individuals with disabilities is still a challenge.
- SEWRPC annually evaluates the effectiveness of its outreach efforts and documents the outcome on its website.

<https://www.sewrpc.org/SEWRPCFiles/PublicParticipation/PublicParticipationAccomplishmentsEvaluation2019.pdf>

Recommendations:

None

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

4.4.1 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 are able to meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency.

4.4.2 Findings

Significant disparities exist between minority populations and non-minority populations in the Region, particularly in the Milwaukee metropolitan area, with respect to educational attainment levels, per capita income, and poverty. Milwaukee County has declared racism a public health crisis and the City of Milwaukee is one of the most racially segregated in the U.S. This condition creates significant challenges to decision-makers in the region. Below is a brief summary of SEWRPC efforts to address equity in the region.

- SEWRPC’s Surface Transportation Block Grant (STBG) project selection process for the Milwaukee urbanized area includes an equity criterion. Specifically, project applicants that provide adequate transit and a good balance of housing and jobs get 10 additional points in the 100-point scoring process.
- SEWRPC biannually reviews its STBG funding distribution for equity. This review is documented.
- VISION 2050 identified transportation accessibility gaps with respect to jobs, healthcare, education, recreation, and other considerations. The ability of Vision 2050 to address these gaps has been analyzed using the following criteria: 1) accessibility for minority populations and low-income populations by transit and automobile to jobs and other activity centers; 2) minority populations and low-income populations served by transit; 3) transit service quality for minority populations and low-income populations; 4) benefits and impacts of new and widened arterial streets and highways on minority populations and low-income populations; and 5) transportation-related air quality impacts on minority populations and low-income populations. Vision 2050 recommendations included expanding transit availability and accessibility to the entire urbanized area (linking to jobs and activity centers) and improving the speed of transit travel.
- While Vision 2050 recommends significant expansion of transit, the lack of transit funding in its fiscally constrained transportation system (FCTS) will result in a 35 percent reduction in transit service and minimal addition of higher-quality transit service that



will result in significantly less access to jobs, healthcare, education, and other daily needs, and an overall reduction in transit service quality when compared to both VISION 2050 and the transit system that exists today. Given current limitations at the State level on local government revenue generation and on the Wisconsin Department of Transportation's ability to allocate funds between different programs, the ability for the Region to avoid such a disparate impact is dependent on the State Legislature and Governor providing additional State funding for transit services, or allowing local units of government and transit operators to generate such funds on their own.

- Transportation air pollution impacts are evaluated and measured as within ½ or ¼ mile of planned roadway widening.
- The planned freeway system, including those freeway segments to be widened under the updated VISION 2050 and FCTS, is compared to locations of current concentrations of minority populations and low-income populations
- SEWRPC continues to use an Environmental Justice Task Force which was established in 2007 and continues to meet quarterly, or as needed based on regional planning schedules. The primary role of the 15-member Task Force is to enhance the consideration and integration of environmental justice throughout the regional planning process.

Recommendations:

Recommend updating self-certification statement to include examples that demonstrate compliance with the various laws (See Appendix B in this report for an example). Also, recommend assessing degree of ADA compliance by member jurisdictions with ADA transition plan requirements and providing assistance as needed.

Commendation:

The Federal Review Team commends SEWRPC on the depth of its equity analysis, including the recognition of the impacts of the region's segregation problem and inadequate transit funding, and its development of equity project selection criteria.

4.5 Freight Planning

4.5.1 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.

4.5.2 Findings

- SEWRPC has made good progress in the area of freight planning since the last review.
- The region, like much of Wisconsin, sees a lot of pass-through freight.
- Staff has worked closely with WisDOT to ensure relevant recommendations were included in the regional transportation plan (RTP).
- VISION 2050 recommends a multimodal freight system as a component of the Plan, identifies specific strategies on how to get there, and identifies a list of prioritized potential freight projects. These efforts compliment Wisconsin's current Freight Plan adopted in 2019.
- SEWRPC, in consultation with WisDOT, successfully designated Critical Urban Freight Corridors (CUFCs) for the Milwaukee urbanized area in 2019. Similarly, WisDOT, in consultation with SEWRPC, designated CUFCs and Critical Rural Freight Corridors (CRFCs) in the Region's other urbanized and non-urbanized areas.
- SEWRPC's Executive Director and/or Chief Transportation Engineer (alternate) continue to attend and participate in WisDOT's Freight Advisory Committee as an MPO/RPC representative.
- The Commission also actively participated in a WisDOT led Oversize/Overweight Working Group. This effort culminated in a set of privately funded infrastructure improvements to facilitate OSOW shipments along a key route connecting the City of West Allis and Port of Milwaukee. In addition, a Wisconsin State Statute was enacted that prohibits any future actions that would make any portion of this OSOW route unavailable for use by a truck transporting a load up to 28-feet wide and 23-feet high.
- While no current federal freight funding has yet been spent in SE Wisconsin, SEWRPC's work in prioritizing freight corridors and potential projects ensures the area is ready to compete for funding that may become available.
- SEWRPC is committed to looking ahead, remaining responsive and providing support to the Region's freight needs into the future.

Recommendations: None.

4.6 Transportation Safety & Security

4.6.1 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.

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.

4.6.2 Findings

SEWRPC has established its own short-term and long-term (2046-2050) targets for the national safety performance measures. The targets are of an aspirational nature and quantify the safety objective and safety recommendations of VISION 2050. The safety targets are reported and monitored in the transportation system performance section of the SEWRPC's Annual Report and on its website. The regional long-term targets will be reviewed and updated every four years as part of the interim regional plan update and every 10 years as part of the major regional plan update. SEWRPC is working to develop a Regional Safety Implementation Plan that will identify arterials and intersections with safety issues. Other activities include:

- SEWRPC's STBG project selection process gives points (5 out of 100-point system) for projects that improve safety.
- TA-Set Aside project selection criteria also includes safety.
- SEWRPC assists counties and local governments with development of hazard mitigation plans.

Recommendations:

None.



4.7 Nonmotorized Planning

4.7.1 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.

4.7.2 Findings

With the rescission of the State's Complete Streets policy, there is much more variation in the region as far as nonmotorized accommodations. SEWRPC nonmotorized planning efforts have been focused on identifying gaps in its nonmotorized network. Any significant progress in the future will require consideration of taking space from parking and/or travel lanes.

VISION 2050 envisions expanding the 299 miles of off-street paths in 2015 to approximately 709 miles of off-street paths by the year 2050. SEWRPC nonmotorized performance measures include on-street bicycle accommodations in miles, off-street bicycle paths in miles and bike share stations. Since plan completion, 114.3 miles of standard or enhanced on-street bicycle facilities have been implemented, or about 5 percent of the approximately 2,400 miles of arterial streets and highways recommended in VISION 2050 to have new on-street bicycle facilities. Additionally, there have been 11.4 miles of off-street paths implemented since plan completion, or about 3 percent of the 410 miles of new off-street paths recommended for the Region. Vision 2050 also encourages communities with 50 or more employees to maintain updated ADA transition plans, which evaluate and plan for physical improvements to address accessibility for people with disabilities

SEWRPC bike-ped count program began in 2015 with a FHWA funded pilot. In 2018, SEWRPC created an interactive web map¹ that provides count information for SEWRPC's 55 count locations and 42 additional count locations managed by WisDOT, Milwaukee County, Ozaukee County, and the City of Milwaukee. SEWRPC staff coordinates with these local agencies to develop annual count schedules and to share count data. A standing committee organized

¹ <http://www.sewrpc.org/SEWRPC/Transportation/nmcounts.htm>



through the Milwaukee County Trails Council provides further opportunity for the representatives from each of these agencies to discuss their count programs and to develop counting strategies that benefit the entire region.

Bike share is currently operated in the Cities of Milwaukee, Wauwatosa, and West Allis and the Village of Shorewood by Bublr Bikes. Bublr Bikes has expanded to a total of 89 stations in 2019. The City of Milwaukee and Bublr Bikes are currently working to expand the system by 26 additional stations. In August 2019, the City of Milwaukee launched an adaptive bicycle pilot program with Bublr Bikes that makes tricycles and hand cycles accessible to people of all abilities available. The program ends in December 2019 and will be evaluated by the City of Milwaukee in early 2020.

There has been no known progress since 2015 towards development of pedestrian safety action plans or Safe Routes to School initiatives by local governments; however, the Wisconsin Bike Federation organizes several Safe Routes programs and classes at many elementary schools each year, particularly within the Milwaukee Public Schools system. SEWRPC plans to host a Safe Transportation for Every Pedestrian (STEP) workshop in 2021.

Recommendations:

None.

4.8 Travel Demand Forecasting

4.8.1 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.

4.8.2 Findings

SEWRPC travel demand models have been maintained, refined, and validated by SEWRPC since the 1960s. These travel simulation models have been employed in the preparation of the regional transportation plans, for the motor vehicle emissions forecasts for the SIPs and Maintenance Plans developed by the Wisconsin Department of Natural Resources (WDNR) and traffic forecasts used during environmental project development. These models and their validation are thoroughly described in SEWRPC Technical Report No. 51, Travel Simulation



Models of Southeastern Wisconsin (July 2017). SEWRPC models undergo rigorous review, validation and refinement. The models have generally indicated estimated traffic volumes that are generally within 10 percent of ground traffic counts. Moreover, SEWRPC staff has demonstrated expertise and experience in the development and application of travel simulation models and is active in national committees concerning travel demand models.

There are several risk factors in the region that could cause higher scrutiny of SEWRPC's model and traffic forecasting process including opposition by local advocacy groups to projects that increase highway capacity and designation as an air quality nonattainment and maintenance area. SEWRPC does traffic forecasting for WisDOT on major projects in the region and is working to complete documentation of its forecasting procedures.

Recommendations:

None.

4.9 Air Quality

4.9.1 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).

4.9.2 Findings

The SEWRPC metropolitan planning area has within its boundary designated non-attainment areas for the 2008 and 2015 Ozone National Ambient Air Quality Standards (NAAQS) and maintenance areas for the 1997 Ozone and 2006 fine particulate NAAQS. Conformity was demonstrated for the current 2050 FCTS and 2021-2024 TIP in December 2020. The determination of conformity of the FCTS and TIP travel and emission forecasts were for the network analysis years of 2020, 2022, 2025, 2030, 2040 and 2050.

A 2012 Memorandum of Agreement for the Wisconsin Transportation Conformity Interagency Consultation Workgroup (WTCICW) outlines the roles and responsibilities between MPOs, FHWA, FTA, WDNR and WisDOT for air quality conformity determinations on transportation



plans and TIPs. At a minimum, the WTCICW meets quarterly and the consultation process has been collaborative and effective in identifying and addressing air quality issues.

Greenhouse gas (GHG) impacts on various Vision 2050 RTP scenarios were evaluated when the Vision 2050 was initially adopted in 2016 (see Vol II #55). The analysis used the EPA's MOVES model. Vision 2050 does address climate change in different parts of the document. The issue of climate change, transportation and land use contributions to the problem, and regional responses are discussed in different sections of Vision 2050 but in a manner not easily accessible to readers.

Recommendations:

The issue of climate change and greenhouse gas emissions in Vision 2050 is addressed in several parts of the plan documents but not in a comprehensive manner or one that is easily found by the public. We recommend SEWRPC consolidate and expand its discussion of climate change and greenhouse gas emissions during the next update of Vision 2050. Consider adopting specific metrics and targets.

4.10 Congestion Management Process / Management and Operations

4.10.1 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.

4.10.2 Findings

SEWRPC completed an update of its congestion management process (CMP) in August 2020 (MEMORANDUM REPORT NUMBER 203 (2ND EDITION)). The CMP documents the land use and transportation planning process used by SEWRPC, which incorporates congestion management into the development of plan recommendations. Congestion management objectives and performance measures are developed, reviewed, and refined as part of the development of the regional transportation plan updates that occur approximately every ten years, and during



interim review and updates occurring every four years. Below are the performance measures used to evaluate planning scenarios.

Multi-Modal Performance Measures: Transit Service Level, Transit Passenger Boardings, Access to Transit, Access to Fixed-Guideway Transit, Transit Service Quality, Accessibility via Transit, Number of People Living in Walkable Areas, Bicycle Level of Service, and Access to Park-Ride Facilities.

Recurring Congestion Performance Measures: Average Weekday Congestion on the Total Arterial Street and Highway System, Average Weekday Congestion on the Freeway System, Average Weekday Congestion on the Regional Highway Freight Network, Peak Hour Travel Speeds and Accessibility via Automobile.

Nonrecurring Traffic Congestion: Number and Rate of Vehicular Crashes, Number and Rate of Fatal and Serious Injury Vehicular Crashes, Total Number of Vehicular Crashes Involving Bicycles or Pedestrians

The national performance measures related to congestion management are also used as part of the congestion evaluation.

For the development of each alternative planning scenario, consideration is first given to public transit, bicycle and pedestrian, travel demand management, and transportation systems management improvements. For each alternative, these four transportation elements are quantitatively tested and evaluated with respect to their travel impacts and potential to reduce congestion prior to any consideration of arterial street and highway system improvement and expansion.

SEWRPC monitors the various performance metrics on a near annual frequency depending on the availability of data. This monitoring has been documented in the performance section of the SEWRPC's annual report. As the interim and major plan updates are conducted, this information is used to monitor the accuracy of the forecasts that underlie its regional land use and transportation plan; the progress made in implementation of the plan, including plan recommendations pertaining to congestion management. Monitoring of congestion and safety allow for the comparison of historical trends in traffic congestion and traffic safety on the arterial street and highway system in Southeastern Wisconsin. Over time these trends allow SEWRPC to develop an assessment of the effectiveness of recommended congestion management actions that have been implemented. In addition, during each regional land use and transportation plan update, a few implemented recommendations—including those projects funded through FHWA CMAQ funding—will be selected for evaluation of their specific impact on transportation system congestion and performance in the Region. SEWRPC notes in its CMP that no one project can be expected to have a significant impact on congestion, rather it is many projects implemented over time and within the context of a comprehensive multimodal plan that the overall benefits of the congestion management measures are realized.



Recommendations:

None.

4.11 Transportation Performance Management

4.11.1 Regulatory Basis

Section 1203 of the Moving Ahead for Progress in the 21st Century Act (MAP-21) mandated the development of performance measures to increase accountability and transparency of the Federal-aid highway program and improve project decision-making through performance-based planning and programming. 23 CFR 490 specifies the federal performance rules and their associated requirements.

The planning regulation (23 CFR 450) also address requirements applicable to MPOs. The final safety performance measure rule was effective April 14, 2016 and the system performance measure rules were effective May 20, 2017. The first applicable deadline for MPOs is to establish their own safety targets, adopt WisDOT safety targets or adopt a combination thereof by February 27, 2018. MPO RTP or TIP updates on or after May 27, 2018 must be fully compliant with the safety performance measure requirements (May 20, 2019 for system performance measures and pavement/bridge measures).

The RTP needs to include:

- A description of the federally required performance measures and targets used in assessing the performance of the transportation system. [23 CFR 450.324]
- A system performance report evaluating the condition and performance of the transportation system with respect to the performance targets [23 CFR 450.324]

The TIP needs to include (to the maximum extent practicable) a description of the anticipated effect of the TIP toward achieving the federally required performance targets identified in the MTP, linking investment priorities to those performance targets. [23 CFR 450.326]



The FTA's transit asset management performance management requirements² outlined in 49 USC 625 Subpart D are a minimum standard for transit operators. Providers with more data and sophisticated analysis expertise can add performance measures and utilize those advanced techniques in addition to the required national performance measures. The performance measures are as follows:

- **Rolling Stock:** The percentage of revenue vehicles (by type) that exceed the useful life benchmark (ULB).
- **Equipment:** The percentage of non-revenue service vehicles (by type) that exceed the ULB.
- **Facilities:** The percentage of facilities (by group) that are rated less than 3.0 on the Transit Economic Requirements Model (TERM) Scale.
- **Infrastructure:** The percentage of track segments (by mode) that have performance restrictions. Track segments are measured to the nearest 0.01 of a mile.

MPOs must establish targets specific to the MPO planning area for the same performance measures for all public transit providers in the MPO planning area within 180 days of when the transit provider establishes its targets.

The FTA's public transportation agency safety plan rule establishes requirements for recipients of federal transit funds to develop public transportation agency safety plans. The plans would include the recipient's strategies for minimizing the exposure of the public, personnel, and property to unsafe conditions and include safety performance targets.

4.11.2 Findings

As discussed earlier in this report, SEWRPC has a long history of comprehensively integrating performance measures into its planning processes. For the national performance measures, SEWRPC has adopted its own targets except for the CMAQ measures requiring joint development and adoption with WisDOT. In addition to the 2-year and 4-year targets required under 23 CFR 490, SEWRPC has established aspirational 2050 targets under its long-range plan. The measures and targets are addressed in Appendix B of the Vision 2050 long-range plan³ which satisfies the systems performance

³ <https://www.sewrpc.org/SEWRPCFiles/LUTranSysPlanning/2019-12-16/VISION2050-2020Update-AppendixB-revisedDraft.pdf>



report required under the regulations. The targets are also reported and monitored in the transportation system performance section of the SEWRPC's Annual Report and on its website. The regional long-term targets will be reviewed and potentially updated every four years as part of the interim regional plan update and every 10 years as part of the major regional plan update. SEWRPC plans to create an online report combining its own performance metrics with the national performance metrics.

In September 2020, SEWRPC submitted to WisDOT a CMAQ Program Performance Plan for the 2018-2021 midperformance period progress report. This CMAQ performance plan documents the mid-performance period progress of the three CMAQ performance measures towards achieving the two-year targets established for 2019. This report also provides updated descriptions of CMAQ projects programmed for years 2018-2021 and an assessment of the contribution of these projects in achieving the two-year and four-year targets.

Recommendations:

None.

4.12 Financial Planning

4.12.1 Regulatory Basis

The metropolitan planning statutes state that the long-range transportation plan and TIP (23 U.S.C. 134 (j) (2) (B)) must include a "financial plan" that "indicates resources from public and private sources that are reasonably expected to be available to carry out the program." Additionally, the STIP may include a similar financial plan (23 U.S.C. 135 (g)(5)(F)). The purpose of the financial plan is to demonstrate fiscal constraint. These requirements are implemented in the transportation planning regulations for the metropolitan long-range transportation plan, TIP, and STIP. These regulations provide that a long-range transportation plan and TIP can include only projects for which funding "can reasonably be expected to be available" [23 CFR 450.322(f)(10) (metropolitan long-range transportation plan), 23 CFR 450.324(h) (TIP), and 23 CFR 450.216(m)(STIP)]. In addition, the regulations provide that projects in air quality nonattainment and maintenance areas can be included in the first two years of the TIP and STIP only if funds are "available or committed" [23 CFR 450.324(h) and 23 CFR 450.216(m)]. Finally, the Clean Air Act's transportation conformity regulations specify that a conformity determination can only be made on a fiscally constrained long-range transportation plan and TIP [40 CFR 93.108].

4.12.2 Findings

The financial analysis in Vision 2050 examines the expected costs of its transportation recommendations and compares those costs to reasonably expected revenues that would be available. The estimated costs include the necessary system level costs to preserve the existing transportation system, such as arterial street resurfacing and transit system bus replacement.



Comparing cost and revenue forecasts illustrates funding gaps, especially for transit service, that would need to be addressed to fully implement VISION 2050. To address the funding gaps, VISION 2050 identifies additional revenue sources⁴ that should be explored. Only the portion of VISION 2050 that can be funded with current revenues is considered in the “fiscally constrained” regional transportation plan and is referred to as the Fiscally Constrained Transportation Plan (FCTP) for VISION 2050.

Transit system improvement and expansion, as recommended under VISION 2050, would require State legislation to create local dedicated transit funding (as recommended in previous SEWRPC regional transportation plans) and a renewal of adequate annual State financial assistance to transit. In terms of State financial assistance to transit, VISION 2050 recommends that the State restore the cut in transit funding from the 2011-2013 State budget, raise funding back to historical levels, and increase future funding at the rate of inflation. The Wisconsin Transportation Finance and Policy Commission recommended an annual increase in statewide transit funding of \$36.3 million along with recommended revenue sources to support the additional funding. Implementing these measures would have the potential to partially address the transit funding gap.

The 2021-2024 TIP includes an estimate of system level operations and maintenance costs. The estimated costs are annually \$79 million in 2021 constant dollars—\$47 million for State maintained facilities and \$32 million for local and county facilities—based on historical local, county, and State funding levels.

Recommendations:

None.

⁴ See also FHWA’s manual entitled *Value Capture: Capitalizing on the Value Created by Transportation* https://www.fhwa.dot.gov/ipd/pdfs/value_capture/value_capture_implementation_manual_2019.pdf



5.0 CONCLUSION AND RECOMMENDATIONS

The FHWA and FTA review found that the metropolitan transportation planning process conducted by SEWRPC meets and exceeds Federal planning requirements.

5.1 Commendations

The following are noteworthy practices that SEWRPC is doing well in the transportation planning process:

Civil Rights: The Federal Review Team commends SEWRPC on the depth of its equity analysis, including the recognition of the impacts of the region's segregation problem and inadequate transit funding, and its development of equity project selection criteria.

SEWRPC's continuing, comprehensive, and cooperative (3C) planning process: The Federal Review Team commends SEWRPC on its successful efforts to work collaboratively with all of its planning partners and community groups. Most noteworthy are SEWRPC's relationship with and high commitment to aiding transit agencies and its collaborative efforts to develop PM3 transportation performance measures and targets with its planning partners.

Transit Planning: The Federal Review Team commends SEWRPC on its commitment to promoting transit planning in the region. Transit providers within the Milwaukee urbanized area, and throughout seven county area value SEWRPC's technical assistance in developing transit plans, and other transit related studies and projects.

5.2 Corrective Actions

None.

5.3 Recommendations

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

Public Involvement: Consider incorporating into SEWRPC's public involvement plan virtual public involvement techniques utilized during the pandemic.

Civil Rights: Determine degree of ADA transition plan compliance amongst member jurisdictions and provide assistance, as needed, to jurisdictions needing to develop an ADA transition plan.



Civil Rights: Recommend expanding self-certification statement by providing examples of activities that indicate compliance with the various laws (see Appendix B for example).

Air Quality: Recommend SEWRPC consolidate and expand its discussion of climate change and greenhouse gas emissions during the next update of Vision 2050. Consider adopting specific metrics and targets.



APPENDIX A - PARTICIPANTS

The following individuals were involved in the SEWRPC on-site review:

- Mitch Batuzich, Mary Forlenza, FHWA Wisconsin Division
- Bill Wheeler, Evan Gross, Mariliza Trovela, FTA Region 5
- Kevin Muhs, Ben McKay, Chris Hiebert, Ryan Hoel, Libby Larsen, Nakeisha Payne, Eric Linde, SEWRPC
- Chuck Wade, Jim Kuehn, Jennifer Murray, Tony Barth, Andrew Levy, Brian Porter, Wisconsin Department of Transportation
- Transit Participants:
 1. John Rodgers, Milwaukee County Transit System
 2. Brian Engelking, City and County of Waukesha
 3. Nelson Ogbuagu, Kenosha Area Transit
 4. Mike Maierle, RYDE, City of Racine
 5. Jeff Polenske, Dave Windsor, City of Milwaukee Streetcar
 6. Joy Nelson, Ozaukee/Washington County
 7. Carolyn Feldt, Western Kenosha County Transit
 8. Nicole Hill, Walworth County
 9. Cameron Clapper, Whitewater Taxi
 10. Gary Cardarelle, Hartford Taxi
 11. Angela Rosenberg, West Bend Taxi



APPENDIX B – Sample Self-Certification Statement

MPO Self-Certification Summary

The MPO Policy Board is charged with implementing the metropolitan planning process in accordance with applicable requirements of federal laws, including transportation statutes, the Clean Air Act, the Civil Rights Act, and the Americans with Disabilities Act. All agencies involved in the transportation planning process must also be held accountable to these federal requirements.

By federal law, agencies providing transportation services and/or receiving federal money must adhere to the requirements as listed in the MPO’s adopted self-certification resolution. Concurrent with submittal of the proposed TIP to the FHWA and FTA MPOs are required to certify that the metropolitan transportation planning process is being carried out in accordance with all federal requirements.

The 10 requirements for self-certification and MPO activities to comply are summarized below.

(1) 23 U.S.C. 134, 49 U.S.C. 5303, and this subpart.

These citations summarize the metropolitan planning requirements, which include a compliant planning process; current approved Transportation Improvement Program, Long-Range Transportation Plan, Transportation Planning Work Program, Public Participation Plan, and Congestion Management Process (TMAs); current interagency agreements; approved metropolitan area boundaries; and annual listings of obligated projects. TMA MPOs should also have a current certification from FHWA-FTA.

Example MPO Documentation of Compliance:

Current Documentation

Transportation Plan	Green Bay Metropolitan Planning Organization (MPO) 2045 Long-Range Transportation Plan, adopted October 7, 2015
TIP	Sheboygan Metropolitan Planning Area Transportation Improvement Program Calendar Years 2016 – 2019, approved January 8, 2016
UPWP	2016 Planning Work Program for the La Crosse Area Planning Committee, adopted November 18, 2015, approved by FHWA-FTA 12/29/2016
PPP	Public Participation Plan Janesville Area Metropolitan Planning Organization, Adopted October 22, 2012
CMP (TMA)	Congestion Management Process for the Madison Metropolitan Planning Area, Adopted October 5, 2011



MPO Cooperative Agreement Executed May 2, 2008

Metropolitan Planning Area Boundary Approved by MPO & WisDOT 6/16/2014

Annual Listing of Obligated Projects 2015 annual listing posted on website

FHWA-FTA Certification (TMA) April 1, 2016

All of these documents can be found on the MPO's website.

The MPO met _____ times during 2016.

- (2) *In non-attainment and maintenance areas, sections 174 and 176 (c) and (d) of the Clean Air Act, as amended (42 U.S.C. 7504, 7506 (c) and (d)) and 40 CFR Part 93.*

The MPO is required to have a conforming long range plan and TIP. State and local transportation officials take part in a collaborative 3C planning process to determine which planning elements will be implemented to improve air quality.

Example MPO Documentation of Compliance:

The entire metropolitan planning area is designated in attainment with National Ambient Air Quality Standards.

Or

The MPO is within Sheboygan County, which is designated as a marginal nonattainment area under the 2008 ozone NAAQS. FHWA-FTA determined conformity on the *Year 2045 Sheboygan Area Transportation Plan* on May 28, 2015 and on the Sheboygan Metropolitan Planning Area Transportation Improvement Program: Calendar Years 2016-2019 on December 11, 2015. The Bay-Lake Regional Planning Commission as MPO for the Sheboygan urbanized area is a signatory to the Wisconsin 2012 Memorandum of Agreement Regarding Determination of Conformity of Transportation Plans, Programs and Projects to State Implementation Plans and participates as a member of the Wisconsin Transportation Conformity Interagency Consultation Workgroup, which meets regularly to cooperatively ensure compliance with all air quality planning and conformity requirements.

- (3) *Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000d-1) and 49 CFR Part 21.*

Title VI prohibits exclusion from participation in, denial of benefits of, and discrimination under federally-assisted programs on the grounds of race, color, or national origin.

Example MPO Documentation of Compliance:

The MPO complies with this requirement through the policies identified in the MPO's Title VI and Non-Discrimination Program/Limited English Proficiency Plan that was approved by the MPO Policy Board on June 4, 2014. Activities include conducting an EJ analysis of the existing transportation network and projects proposed in the current MTP. The MPO Public Participation Plan also includes outreach strategies to traditionally underserved and limited-English populations (LEP) which are periodically evaluated for effectiveness. EJ outreach strategies



include use of minority-focus media and the existence of an EJ Committee consisting of representatives from community organizations familiar with the unique characteristics and needs of the EJ populations in the region.

- (4) *49 U.S.C. 5332, prohibiting discrimination on the basis of race, color, creed, national origin, sex, or age in employment or business opportunity.*

Example MPO Documentation of Compliance:

The MPO complies with this requirement through the policies identified in the MPO's Title VI Non-Discrimination Program/Limited English Proficiency Plan that was approved by the MPO Policy Board on June 4, 2014 and Title VI Non-Discrimination Agreement executed October 28, 2013.

- (5) *Section 1101(b) of the MAP-21 (Pub. L. 112-141) and 49 CFR Part 26 regarding the involvement of disadvantaged business enterprises (DBEs) in USDOT-funded projects.*

The DBE program ensures equal opportunity in transportation contracting markets, and in the statute Congress established a national goal that 10% of federal funds go to certified DBE firms.

Example MPO Documentation of Compliance:

The MPO will follow the WisDOT's federally approved DBE program when soliciting contractors to complete MPO projects using federal MPO planning funds.

- (6) *23 CFR Part 230, regarding the implementation of an equal employment opportunity program on federal and federal-aid highway construction contracts.*

Example MPO Documentation of Compliance:

This requirement does not directly apply to the MPO because it is not involved in federal or federal-aid highway construction contracts. However, the East Central Regional Planning Commission has an Affirmative Action Program for Equal Employment Opportunities effective January 29, 2016 that outlines SEWRPC's policies.

- (7) *The provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) and 49 CFR parts 27, 37, and 38.*

Programs and activities funded with federal dollars are prohibited from discrimination based on disability.

Example MPO Documentation of Compliance:

The MPO complies with this requirement through the policies identified in the MPO's Title VI and Non-Discrimination Program/Limited English Proficiency Plan that was approved by the MPO Policy Board on June 4, 2014. The MPO's offices and all public involvement locations are ADA compliant and transit accessible. The MPO also periodically evaluates its website for accessibility by individuals with disabilities. Finally, the MPO transportation plan VISION 2050 includes recommendations to provide pedestrian facilities that facilitate safe, efficient, and accessible pedestrian travel, including addressing gaps in the pedestrian network through neighborhood connections to regional off-street bicycle paths, transit, and major destinations; that all pedestrian facilities be designed and constructed in accordance with the Federal Americans with Disabilities Act (ADA) and its implementing regulations; and encourages communities with 50 or more employees to maintain updated ADA transition plans.

- (8) *The Older Americans Act, as amended (42 U.S.C. 6101), prohibiting discrimination on the basis of age in programs or activities receiving federal financial assistance.*



Example MPO Documentation of Compliance:

The MPO complies with this requirement through the policies identified in the MPO's Title VI and Non-Discrimination Program/Limited English Proficiency Plan that was approved by the MPO Policy Board on June 4, 2014 and Title VI Non-Discrimination Agreement executed October 28, 2013. The MPO also follows the City's nondiscrimination policy because the MPO is housed within the City Planning Department. The MPO's public involvement activities target elderly populations and organizations advocating for their interests.

(9) Section 324 of title 23 U.S.C. regarding the prohibition of discrimination based on gender.

Example MPO Documentation of Compliance:

The MPO complies with this requirement through the policies identified in the MPO's Title VI and Non-Discrimination Program/Limited English Proficiency Plan that was approved MPO Policy Board on June 4, 2014 and Title VI Non-Discrimination Agreement executed October 28, 2013. The MPO also follows Brown County's nondiscrimination policy because the MPO is housed within the Brown County Planning Department. In development of its latest MTP update, the MPO formed a Women in Transportation subcommittee to assist in the plan's development and implementation.

(10) Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and 49 CFR Part 27 regarding discrimination against individuals with disabilities.

Example MPO Documentation of Compliance:

The MPO complies with this requirement through the policies identified in the MPO's Title VI and Non-Discrimination Program/Limited English Proficiency Plan that was approved by the MPO Policy Board on June 4, 2014 and Title VI Non-Discrimination Agreement executed October 28, 2013. Other activities are addressed in #7 above.



APPENDIX C – PUBLIC COMMENTS

During the virtual public meeting, there were a small number of comments received. Most complimented the SEWRPC planning process. Another raised concern about a project current undergoing an environmental reevaluation, the I-94 E-W.

There were three written comments received before the close of the public comment period on September 24, 2020. A letter was received from individuals representing the ACLU of Wisconsin Foundation, the Interfaith Earth Network, the Law Office of Dennis Grzezinski, the NAACP Milwaukee branch, the Sierra Club Wisconsin, and the 1000 Friends of Wisconsin. Below is a summary of the issues raised in the letter:

- Recognition that there has been continuing progress on the part of SEWRPC's planning efforts since the 2016 certification review. Specifically, SEWRPC's transit funding recommendations, its production of a 66-page VISION 2050 Summary document, and its EJ Task Force.
- Concerns were raised about SEWRPC's hiring, promotion and contracting processes.
- Concern about SEWRPC's ability to address the equity issues, particularly related to transit service in the region. They recommend SEWRPC fundamentally change the way in which it conducts transportation planning to ensure that the outcomes do not have the effect of discriminating against communities of color and persons with disabilities.
- Continued concern that WisDOT's planning efforts are not satisfying its obligations under Title VI of the Civil Rights Act.

The group's recommendations included FHWA and FTA decertifying SEWRPC and requiring that a new MPO, with proportional representation from the city of Milwaukee and County of Milwaukee, be created. Alternatively, conditionally certifying on specific requirements that address the deficiencies and shortcomings of SEWRPC and closely monitor implementation of those conditions. This Federal certification review did not find evidence of discrimination by SEWRPC.

Kristi Luzar, Executive Director of the Urban Economic Development Association of Wisconsin (UEDA) provided a letter in support of SEWRPC's planning efforts citing SEWRPC's collaboration with UEDA and its public outreach efforts.

Brian Peters, a Community Access and Policy Specialist from Independence First, followed-up by email on a comment he provided during the review's virtual public meeting on August 24, 2020. Mr. Peters addressed the format of the public meeting and recommended reading the questions out loud, as the chat box isn't necessarily accessible to everyone (i.e. visual disabilities, phone, people with cognitive processing issues that can't keep track of multiple input, etc.).



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 21st Century
- MPA:** Metropolitan Planning Area
- MPO:** Metropolitan Planning Organization
- MTP:** Metropolitan Transportation Plan
- NAAQS:** National Ambient Air Quality Standards
- NO₂:** Nitrogen Dioxide
- O₃:** Ozone
- PM₃:** The 3rd round of national performance measures including percent of reliable person-miles traveled on the Interstate, percent of reliable person-miles traveled on the non-Interstate NHS, percentage of Interstate system mileage providing for reliable truck travel time (Truck Travel Time Reliability Index), total emissions reductions by applicable pollutants under the CMAQ program, annual hours of peak hour excessive delay per capita, percent of non-single occupancy vehicle travel.
- PM₁₀ and PM_{2.5}:** Particulate Matter
- SEWRPC:** Southeastern Wisconsin Regional Planning Commission
- 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
- WisDOT:** Wisconsin Department of Transportation





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