



U.S. Department of Transportation
Federal Transit Administration
Region V
200 West Adams, Suite 2410
Chicago, IL 60606



U.S. Department of Transportation
Federal Highway Administration
Illinois Division Office
3250 Executive Park Drive
Springfield, IL 62703

June 1, 2018

In Reply Refer To:
HPER-IL

Mr. Randall S. Blankenhorn
MPO Policy Committee Chairman
Chicago Metropolitan Agency for Planning
223 South Wacker Drive, Suite 800
Chicago, Illinois 60606

Subject: U.S. Department of Transportation Planning Certification Review Finding
Chicago, Illinois Transportation Management Area

Dear Mr. Blankenhorn:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have completed a joint certification review of the transportation planning process in the Chicago Transportation Management Area. We appreciate the cooperation of the Metropolitan Planning Organization staff in assisting us with the review.

These reviews are made in accordance with 23 U.S.C. 134 which requires a review of the transportation planning process in metropolitan areas with a population of 200,000 or more. The objective of such a review is to determine whether the transportation planning process can be certified as implementing the Federal transportation planning requirements.

The review found the transportation planning process for the Chicago Area, as led by the Chicago Metropolitan Agency for Planning, has fully implemented all necessary Federal requirements. Based on this review, the FHWA and the FTA certify the transportation planning process for the Chicago Metropolitan Planning Area. Enclosed is a report that documents the results of the review and offers several recommendations for continuing quality improvements and enhancements to the planning process.

If you have any questions regarding this certification action, please contact John Donovan, FHWA, at (312) 353-4048 or Anthony Greep, FTA, at (312) 353-1646.

Sincerely,

Kelley Brookins
Acting Regional Administrator
Federal Transit Administration

Catherine A. Batey
Division Administrator
Federal Highway Administration

Enclosure

ecc: Ms. Kristin Williams, Office of the Secretary, IDOT
Ms. Justine Sydello, Deputy Secretary, IDOT
Mr. Omer Osman, Deputy Secretary, IDOT
Ms. Erin Aleman, Director, Office of Planning and Programming, IDOT
Mr. Paul Loete, Director of Office of Highways and Project Implementation, IDOT
Ms. Holly Ostdick, Bureau of Planning, IDOT
Mr. Joseph Szabo, Chicago Metropolitan Agency for Planning
Ms. Melissa Porter, Chicago Metropolitan Agency for Planning
Mr. Jesse Elam, Chicago Metropolitan Agency for Planning
Ms. Teri Dixon, Chicago Metropolitan Agency for Planning
Mr. Doug Ferguson, Chicago Metropolitan Agency for Planning
Ms. Leanne Redden, Regional Transportation Authority
Ms. Jill Leary, Regional Transportation Authority

Chicago, Illinois TMA Certification Review

2018

Based on this review and ongoing oversight by the Federal Highway Administration and the Federal Transit Administration, the transportation planning process carried out in the Chicago, Illinois Transportation Management Area is certified as meeting the requirements as described in 23 Code of Federal Regulations. A number of commendations have been made throughout this report to acknowledge successful practices as well as several recommendations that support continued enhancement of the planning process in this region.



Chicago, Illinois TMA Certification Review

Table of Contents

Part 1: Executive Summary	2
Description and Overview of MPO	2
Previous Findings	3
Certification Status.....	4
Summary of Current Findings	4
Part 2: Transportation Planning Process Review	7
Section 2-1: MPO Organizational Structure.....	7
Section 2-2: Metropolitan Planning Area Boundaries	12
Section 2-3: Agreements and Contracts	13
Section 2-4: Unified Planning Work Program	15
Section 2-5: Transportation Planning Process	15
Section 2-6: Metropolitan Transportation Plan.....	16
Section 2-7: Financial Planning	18
Section 2-8: Air Quality and Transportation Conformity.....	19
Section 2-9: Transportation Improvement Program and Project Selection	21
Section 2-10: Public Outreach and Participation	26
Section 2-11: Self-Certification	27
Section 2-12: Title VI and Nondiscrimination	28
Section 2-13: Congestion Management Process	29
Section 2-14: List of Obligated Projects	30
Section 2-15: Environmental Mitigation	31
Section 2-16: Consultation & Coordination	32
Section 2-17: Transportation Systems Management and Operations	33
Section 2-18: Transportation Safety Planning	34
Section 2-19: Security in the Planning Process.....	35
Section 2-20: Integrating Freight in the Transportation Planning Process.....	35
Part 3: Certification Review Site Visit Participant List.....	38
Part 4: Certification Review Site Visit Meeting Agenda	39
APPENDICES	40

Part 1: Executive Summary

This document describes the review and findings of the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) planning certification review of the transportation planning process in the Chicago, Illinois Transportation Management Area (TMA), as conducted by the Metropolitan Planning Organization (MPO) Policy Committee and staffed by the Chicago Metropolitan Agency for Planning (CMAP).

The MPO is required by Federal law to conduct the metropolitan transportation planning process according to the requirements of the Fixing America's Surface Transportation (FAST) Act, signed into law December 4, 2015. The United States Department of Transportation (U.S. DOT) issued the Statewide and Metropolitan Planning Final Rule on May 27, 2016, which set Federal requirements for the transportation planning process. These requirements updated those previously found in 23 CFR Part 450, the metropolitan planning regulations, and will continue to be closely tied with the Clean Air Act Amendments of 1990 through the U.S. Environmental Protection Agency's (EPA) Air Quality Conformity Regulations.

The FAST Act requires a performance based planning and programming approach which represents a fundamental shift for statewide and metropolitan area transportation planning towards an emphasis on system performance and measurable outcomes. This shift will be reflected throughout the transportation planning process including key topics covered in this review and in the products of the process such as the Metropolitan Transportation Plan (MTP), the Transportation Improvement Program (TIP), and the Unified Planning Work Program (UPWP).

Description and Overview of MPO

Metropolitan Chicago is a dynamic and culturally diverse region. It is an international center for business and leisure travel due in part to the city's transportation accessibility and mobility, a successful business community, and world-class hotels, restaurants, shopping and attractions.

Transportation is a critical component of the region's history as original settlements looked to utilize the Chicago and Mississippi Rivers and Great Lake watersheds for trade. Later, the introduction and expansion of railroads resulted in an influx of people and commerce and positioned the region to develop into a primary transportation hub in the United States. The modern foundations of the region were also created by some of the nation's leading planners and architects who helped re-develop Chicago after the Great Fire of 1871 including the work included in Daniel Burnham's 1909 Plan for Chicago. This revolutionary plan emphasized a regional approach to development and focused on improvement of the lakefront, a regional highway system, improvement of railroad terminals, new outer parks, systematic arrangements of streets, and development of civic and cultural centers. Current planning efforts often call upon these enduring concepts and seek to find ways of prioritizing and implementing them in the context of the modern world.

The Chicago, Illinois TMA is the third largest in the United States in terms of population with a total of 8,608,208 persons as of the 2010 Decennial Census. The region consists of seven complete counties and portions of two other counties. The Chicago TMA is served by six Interstate highways including I-94, I-90, I-88, I-80, I-55, and I-57 as well as the connecting Interstates of I-294, I-290, I-355, and I-190. In total, the region has over 26,000 miles of interstate and arterial roadways. These roadways are complemented by the Regional Transportation Authority (RTA) which oversees the nation's third largest transit system and provides over two million rides daily. The RTA system has over 7,200 route miles and has combined assets valued at more than \$151 billion. The region is the nation's busiest freight hub with 37,500 freight cars passing through each day including one-fourth of all U.S. rail freight.

Two international airports primarily serve the region's air passengers and cargo needs and combine to generate over \$45 billion per year in economic activity.

The Chicago Area Transportation Study (CATS) Policy Committee was designated the MPO for the northeastern Illinois region in 1981. The Committee was renamed the MPO Policy Committee in 2005 after the enactment of the Illinois Regional Planning Act that merged CATS with the Northeastern Illinois Planning Commission to form CMAP. This authorizing legislation established the CMAP Board and identifies the agency as the official regional planning organization for the region's 284 communities in the counties of Cook, DuPage, Kane, Kendall, Lake, McHenry, and Will. The CMAP developed and now guides the implementation of GO TO 2040 which is presented as metropolitan Chicago's first comprehensive regional plan in more than 100 years. GO TO 2040 establishes coordinated strategies that help the region's 284 communities address transportation, housing, economic development, open space, the environment, and other quality-of-life issues.

The MPO Policy Committee is chaired by Randall S. Blankenhorn, Secretary of the Illinois Department of Transportation (IDOT) and the CMAP Board is chaired by Gerald Bennett, Mayor of Palos Hills. The MPO Policy Committee and the CMAP Board have adopted a Memorandum of Understanding (MOU) for transportation planning and programming in Northeastern Illinois. The agreement covers the working relationship between the two boards, whose responsibilities are defined in the Illinois Regional Planning Act and Federal legislation. By adopting this agreement, the MPO Policy Committee and CMAP Board affirm their commitment to coordinate and integrate the region's planning for land use and transportation in an open and collaborative process.

The planning process in the Chicago TMA has been strained at times in the past but has been running smoothly during this past certification cycle. The planning partners have moved beyond some of the intra-regional and intergovernmental struggles on roles, responsibilities, and authority to guide policy and investment decisions, and have moved the needle on a number of important planning issues in recent years. The Regional and State leaders have worked closely and cooperatively to advance performance based planning and programming, specifically regarding the Surface Transportation Program (STP) funding, despite state-level funding challenges throughout the past several years. The CMAP took a significant step towards finding more reliable and sustainable funding to match Federal transportation planning funding by collecting dues from members. While this system was designed to start slowly, it holds a great deal of promise and much-needed financial security for CMAP.

Additionally, the MPO has helped lead the development of the next long-range transportation plan, titled ON TO 2050, building off the important work done for the previous and still current plan, GO TO 2040. The planning process CMAP has implemented for developing ON TO 2050 has been well executed and inclusive, producing important debate and cooperation in an increasingly challenging fiscal environment where the transportation needs at all levels of government continue to outpace limited financial resources. While a great deal of work is still ahead, particularly regarding financial constraint and implementation of the ON TO 2050 plan in the coming year, the MPO has a strong foundation to build from.

Previous Findings

The 2018 Certification Review is the seventh U.S. DOT review of the transportation planning process in the Chicago, Illinois TMA. Previous reviews were conducted in 2014, 2010, 2005, 2002, 1999, and 1996. The 2014 Review issued a total of seventeen formal recommendations and CMAP, IDOT, and other members of the MPO have demonstrated a strong commitment to continue to improve their planning processes and programs. All 2014 recommendations have been considered in the interim years and most topics have been resolved or have made substantial progress. This current review has considered these previous recommendations and incorporated them as appropriate in the 2018 findings.

Certification Status

The 2018 Certification Review finds that the Chicago, Illinois TMA continues to have a high performing planning process that is consistent with the Federal planning requirements in 23 U.S.C. 134 and 49 U.S.C. 5303. Policy recommendations are included throughout this report that identify opportunities to reduce risk to the organizational stability of the MPO as well as identifying the need to provide regional leadership in the deliberation of complex issues such as emerging technology and freight planning. Recommendations also identify technical processes that should be improved, mostly focusing on advancing the pursuit of performance based investments.

Summary of Current Findings

Review Area	Commendations (10) / Recommendations (16) / Observations (7)
<p>Organization Structure of Study Area (2-1)</p>	<p>The Review Team recommends CMAP continue to develop how it publicly explains the roles and responsibilities of the MPO Policy Committee and the CMAP Board, with a goal being easier general public consumption.</p> <p>The Review Team supports the gradual introduction of fees for participating member agencies of CMAP and recommends the MPO continue to explore additional revenue options to reduce the risk of over-reliance on the State of Illinois for matching Federal transportation planning funds.</p> <p>The Review Team recommends the Council of Mayors Planning Liaison program should be further evaluated to ensure the scope of work is appropriate, accountability measures are in place, necessary communication and support is provided by the MPO, and that expectations between the Council of Mayors and CMAP are aligned.</p>
<p>Metropolitan Area Planning Boundaries (2-2)</p>	<p>As Census 2020 approaches, it is recommended CMAP should consider the impacts of a likely expansion of the Census-defined urbanized area.</p> <p>The IDOT is commended for its meticulous approach to leading a systematic review and update of countywide functional classification maps.</p> <p>Observation: The CMAP and the Illinois Congressional delegation demonstrated national leadership in consideration of MPO Coordination legislation.</p>
<p>Agreements and Contracts (2-3)</p>	<p>It is recommended CMAP further engages in the Transportation Asset Management plan process the transit agencies are currently undergoing, and work to develop a strong target development process.</p> <p>The Review Team recommends CMAP work closely with Wisconsin DOT to finalize the updated agreement for the Round Lake Beach-McHenry-Grayslake, IL-WI Urbanized Area.</p>

Review Area	Commendations (10) / Recommendations (16) / Observations (7)
Unified Planning Work Program (2-4)	<p>Observation: The UPWP Committee regularly revisits how planning funds are evaluated and allocated. As financial resources become more strained it is critical that the committee continue to evaluate and improve these processes while incorporating performance based planning principles.</p>
Metropolitan Transportation Plan (2-6)	<p>The development of ON TO 2050 has continued to strengthen the region’s planning process and is commended for its expansive public engagement strategy, focus on its three overarching principles, and its enhanced approach to consideration of regionally significant projects.</p>
Financial Planning (2-7)	<p>The Review Team recommends CMAP and IDOT formalize the process to document and agree to the carryover amounts identified in the TIP. Simple adoption of the TIP or TIP amendments by the MPO should not be considered to endorse this carryover total.</p> <p>Observation: The MPO has proceeded responsibly in considering reasonably available revenue sources for the ON TO 2050 Plan. Identifying strategies and next steps for implementation is crucial to the validity of these sources as previous plans have often targeted revenue sources that have not come to fruition.</p>
Air Quality and Transportation Conformity (2-8)	<p>Observation: Project specific special conformity amendments sought outside the established semi-annual process may introduce unnecessary procedural challenges to high profile projects.</p>
Transportation Improvement Program Development and Project Selection (2-9)	<p>The Review Team commends CMAP and the region’s implementing agencies on the successful transition to eTIP.</p> <p>Observation: To maximize the value of eTIP, additional data and information will be required to support improved visualization, public transparency, and integration of programming and performance measures.</p> <p>The Review Team commends the MPO for the adoption of the Memorandum of Agreement (MOA) regarding the distribution and active program management of regional STP funds. This is a significant step towards performance based planning and programming in the metropolitan region.</p> <p>The Review Team commends IDOT for its support of the STP reform process by seeding the Shared Fund with \$75 million of previously unobligated funding over FFYs 2020-2022 and by supporting the use of Transportation Development Credit (TDC)s for disadvantaged communities. It is unlikely the reform process could succeed without these commitments.</p>

Review Area	Commendations (10) / Recommendations (16) / Observations (7)
<p style="text-align: center;">Transportation Improvement Program Development and Project Selection (2-9)</p>	<p>The Review Team recommends IDOT and CMAP continue to work closely to reconcile accounting of STP accomplishments and unobligated funds that are commonly referred to as the carryover balance. It is further recommended IDOT and CMAP jointly submit the agreed to carryover balance to the STP Project Selection Committee on an annual basis for their formal concurrence.</p> <p>The Review Team commends the region’s CMAQ and the Transportation Alternative Program (TAP) as they continue to be effective models of performance based programming.</p> <p>As the region establishes its CMAQ Performance Plan and performance targets, the Review Team recommends continued emphasis should be placed on projects that demonstrate high cost effectiveness.</p> <p>The Review Team recommends the MPO and RTA work toward further transparency in the FTA 5307 Urbanized Area Formula program sub-allocation process for the transit Service Boards. It is further recommended that CMAP further engage in the early development of the transit Service Board capital programs.</p>
<p style="text-align: center;">Public Outreach and Participation (2-10)</p>	<p>The CMAP is commended for proactively employing innovative techniques to engage public participation from all segments of the community in the northeastern Illinois metropolitan area and its efforts to specifically reach out to minority and economically disadvantaged communities in its planning process.</p>
<p style="text-align: center;">Title VI and Nondiscrimination (2-12)</p>	<p>The CMAP is commended for its emphasis on inclusive growth in the development of ON TO 2050 and for consideration of lower capacity communities throughout various MPO programming processes.</p>
<p style="text-align: center;">Congestion Management Process (2-13)</p>	<p>The Review Team recommends a formal update of the Congestion Management Process (CMP) document may help re-establish a clearinghouse for information and better ensure that overlapping initiatives are better integrated in multi-disciplinary mobility efforts.</p>
<p style="text-align: center;">List of Obligated Projects (2-14)</p>	<p>Observation: the eTIP provides project level obligation information for Federal roadway projects on a real-time basis which reduces concerns with delays in meeting regulatory timeframes for the Regional Project Award and Obligations Report.</p> <p>Observation: There is no evidence that the planning process uses the results of the Obligations report in any meaningful way. It is recommended CMAP continue to explore ways to make award and obligation data informative and useful to future investment and policy decisions.</p>

Review Area	Commendations (10) / Recommendations (16) / Observations (7)
Transportation Systems Management and Operations (2-17)	It is recommended the MPO should more clearly articulate the roles, responsibilities, and differences between the Regional Transportation Operations Coalition (RTOC) and Advanced Technology Task Force (ATTF). As part of this discussion, the MPO should examine how emerging major technological considerations such as vehicle automation, vehicle to vehicle communication, and vehicle to infrastructure communication will be studied and addressed throughout the planning process.
Transportation Safety Planning (2-18)	The Review Team commends the region for ensuring that the safety of transportation system users is a top priority for transportation agencies in the region including the City of Chicago’s Vision Zero initiative, the MPO’s data-driven approach and regional programming processes administered through CMAP and many of the Councils of Mayors.
Integrating Freight in the Transportation Planning Process (2-20)	<p>It is recommended IDOT and CMAP more closely coordinate freight planning and development programs to ensure goals and strategies are focused and aligned. Initial steps could include cross-representation on the Illinois State Freight Advisory Committee (IFSAC) and CMAP Freight Committees in addition to coordinated efforts on data collection and performance reporting.</p> <p>An example of the effectiveness of close coordination between the State and CMAP is demonstrated by the successful establishment of Critical Urban Freight Corridor (CUFC)s. With only 168.54 miles of allotted Statewide mileage, both agencies are commended for reaching an agreement on mileage in metropolitan Chicago with an understanding on when and why modifications may be pursued</p>

Part 2: Transportation Planning Process Review

Section 2-1: MPO Organizational Structure

Requirement: Federal legislation (23 U.S.C. 134(d)) requires the designation of an MPO for each urbanized area with a population of more than 50,000 individuals. When an MPO representing all or part of a TMA is initially designated or redesignated according to 23 CFR 450.310(d), the policy board of the MPO shall consist of (a) local elected officials, (b) officials of public agencies that administer or operate major modes of transportation within the metropolitan area, and including representation by providers of public transportation, (c) appropriate State transportation officials. The voting membership of an MPO that was designated or redesignated prior, will remain valid until a new MPO is redesignated. Redesignation is required whenever the existing MPO seeks to substantially change the proportion of voting members representing individual jurisdictions or the State or the decision-making authority or procedures established under MPO bylaws. The addition of jurisdictional or political bodies into the MPO or of members to the policy board generally does not require a redesignation of the MPO.

Status: The Policy Committee of CATS was designated the MPO for the Chicago metropolitan region on October 14, 1981, by Governor James R. Thompson. The CATS Policy Committee was

renamed the “MPO Policy Committee” after the Regional Planning Act (70 ILCS 1707/1 et. seq.) created CMAP in 2005. The MPO Policy Committee and the CMAP Board are independent entities but work at the policy level to review staff and committee work to ensure consistency and consensus are achieved.

An MOU covering transportation planning and programming in Northeastern Illinois between the MPO Policy Committee and the CMAP Board was adopted in 2007 and most recently revised and reaffirmed on October 11, 2017. The agreement covers the working relationship between the two boards, whose responsibilities are defined in the Regional Planning Act and Federal legislation. By adopting this agreement, the MPO Policy Committee and CMAP Board affirmed their commitment to coordinate and integrate the region's planning for land use and transportation in an open and collaborative process. Since the 2014 review, the two boards have worked closely and cooperatively together to address funding and performance measure issues, as well as prepare the agency’s latest long term plan, ON TO 2050.

The MPO Policy Committee is the federally recognized transportation planning body for the region and is made up of one member each from the agencies/groups listed below, including two members from CMAP.

MPO Policy Committee Member Agencies

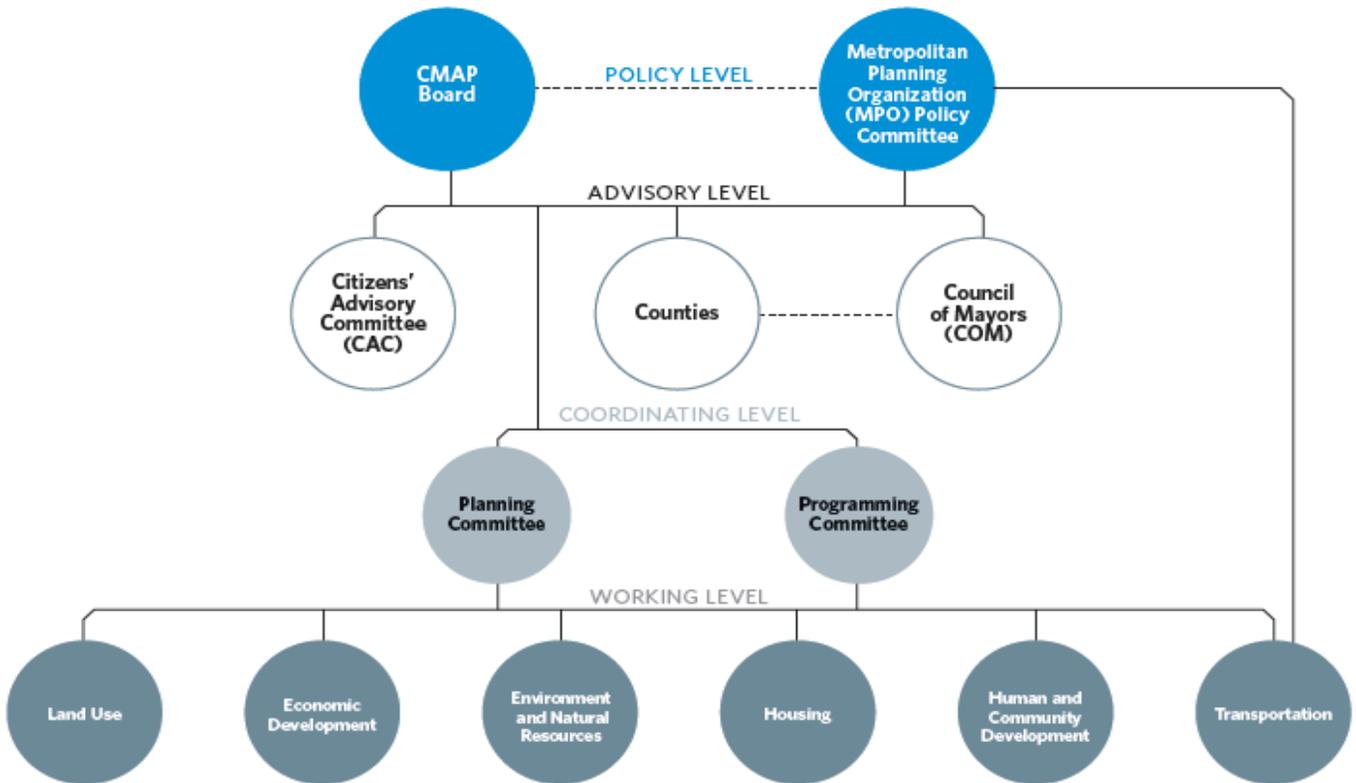
Council of Mayors	Lake County
Regional Transportation Authority (RTA)	DuPage County
Chicago Dept. of Transportation (CDOT)	McHenry County
Illinois Dept. of Transportation (IDOT)	Will County
Commuter Rail Div. of the RTA (Metra)	Kane County
Illinois State Toll Highway Authority	Chicago Metropolitan Agency for Planning (CMAP)
Chicago Transit Authority (CTA)	Class 1 Railroads
Suburban Bus Division of the RTA (Pace)	Federal Highway Administration (FHWA)
Cook County	Federal Transit Administration (FTA)
Kendall County	

The FHWA and the FTA participate in an advisory and non-voting capacity.

The CMAP committee structure has changed slightly since the previous review, returning their coordinating committees to identities similar to the development of GO TO 2040. On October 12, 2016, the CMAP Board approved changes to CMAP's committee structure to aid the development of ON TO 2050. As a result, the Local Coordinating committee was dissolved and a Planning Committee was created made up of representatives from the Board and the six working committees. The Planning Committee reports to the Board, and is responsible for overseeing development of the ON TO 2050 comprehensive regional plan. Additionally, the Regional Coordinating committee was dissolved and a Programming Committee was created that was also made up of representatives from the Board and the six working committees. The Programming Committee is charged with overseeing programming decisions for transportation investment, Local Technical Assistance project selection, and other relevant items. With the many working committees that involve members of both the MPO Policy Committee and the CMAP Board, CMAP is able to ensure communication occurs between all stakeholders. The CMAP operates under a four-level committee structure: policy, advisory, coordinating, and working.

While the MPO Policy Committee and the CMAP Board provide policy decisions and direction for the region, the Citizens’ Advisory Committee, the Council of Mayors, and a committee of County officials comprise the advisory level. The Council of Mayors continues its historic

relationship with the MPO Policy Committee while at the same time serving as a municipal advisory body to the CMAP Board.



October 20, 2016

The Executive Committee of the Council of Mayors was formed in 1981 to provide a link among the councils and also between the councils and the MPO. The executive committee was organized to formalize and strengthen the input from the region's municipalities regarding regional transportation planning and programming decisions. The Council of Mayors is composed of the chief executives of the 283 municipalities in the seven-county CMAP region, organized into 11 subregional councils plus the City of Chicago. Each Council of Mayors has at least one staff person designated as a Planning Liaison. The Planning Liaisons are the primary link between CMAP and the suburban mayors and are directly responsible for the programming of locally sponsored, federally funded projects in the CMAP TIP.

The Transportation Committee is at the working committee level and provides input into each of the two coordinating committees and also has a reporting relationship to the MPO Policy Committee. The MPO Policy Committee and the CMAP Board jointly determine the structure and membership of the Transportation Committee. Other working committees are charged with providing the CMAP Board with guidance that conveys a perspective of its subject matter, providing expertise and input to conduct effective land use and transportation planning, prioritizing projects in the subject matter, and understanding regional needs, challenges, and solutions.

Working Committees include:

- Economic Development Committee
- Environment and Natural Resources Committee
- Housing Committee
- Human and Community Development Committee
- Land Use Committee
- Transportation Committee

Additionally, CMAP also staffs many groups in Northeastern Illinois that are not part of the formal CMAP committee structure but are involved in the development of CMAP products. Some of these groups include:

- Advanced Technology Task Force
- Bicycle and Pedestrian Task Force
- Congestion, Mitigation and Air Quality Improvement Program (CMAQ) Project Selection Committee
- Freight Committee
- STP Project Selection Committee
- Regional Transportation Operations Coalition
- Tier II Consultation Team
- Unified Work Program Committee
- Wastewater Committee

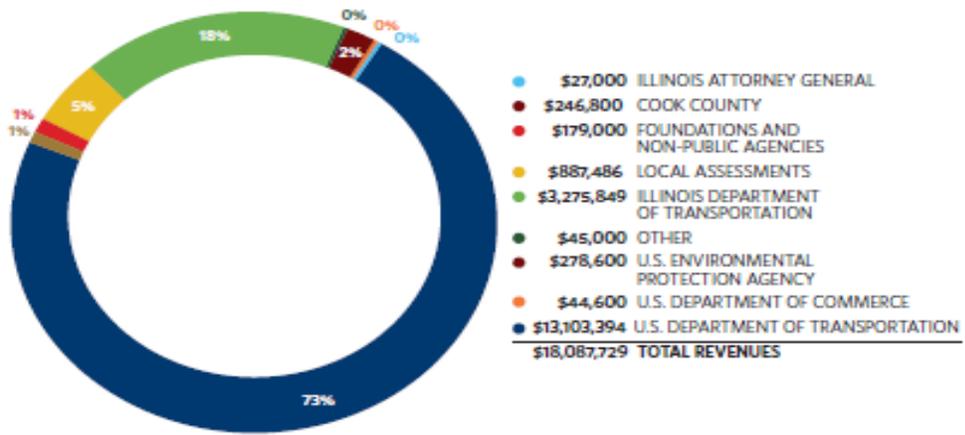
The Executive Director of CMAP is Mr. Joseph C. Szabo, whose position is overseen by the Executive Committee of the CMAP Board. Mr. Szabo leads a staff of approximately 100 persons who are divided into four areas: planning, policy and programming, communications and outreach, and finance and administration. A cross functional management structure is intended to provide maximum flexibility in addressing project tasks by allowing the creation of teams rather than segregated departments. The responsibility of the staff is to implement delegated program responsibilities and to advise the MPO Policy Committee and the CMAP Board on all key decisions.

The unique dual structure of the MPO Policy Committee and the CMAP Board has generally worked for the region. The MPO Policy Committee and the CMAP Board continue to be encouraged to hold at least one joint meeting per year to formally ensure a dialogue is actively maintained between the two bodies. In April 2016, CMAP took an important first step toward reducing organizational risk by restructuring the local dues program, moving the agency in the direction of other regional planning organizations across the U.S. that are mostly supported by local stakeholders. The CMAP collected 99 percent in local dues for FY 2017. For FY 2018 local dues were scheduled to increase but CMAP kept rates at the 2017 levels through its FY 2018 and FY 2019 budgets. The CMAP is overwhelmingly supported by Federal and State transportation planning funds. The non-Federal match to U.S. DOT funding is largely provided by the State through IDOT. This certification review continues to emphasize, as previous reviews have, that heavy reliance on the State to provide matching funds presents an area of significant organizational risk.

Finding: The MPO satisfies the regulatory requirements for the organization and structure of the study area.

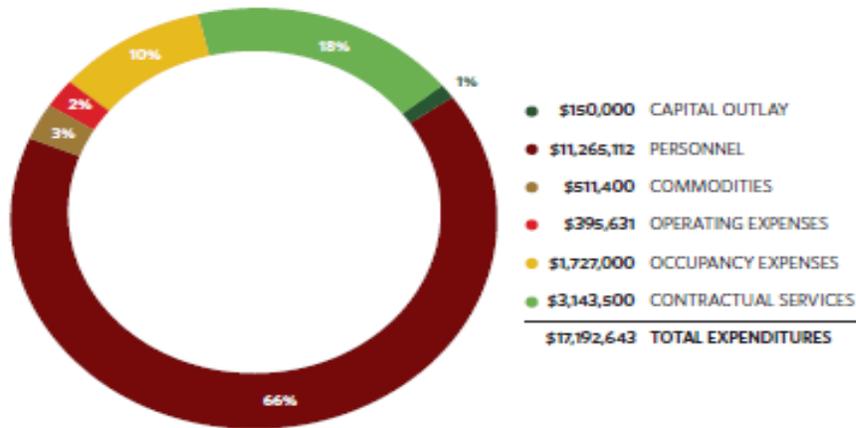
CMAP revenues, FY17

Source: Chicago Metropolitan Agency for Planning.



CMAP expenditures, FY17

Source: Chicago Metropolitan Agency for Planning.



The continued introduction of fees for participating member agencies of CMAP remains a critical issue for CMAP’s financial future. The MPO should continue to explore additional revenue options to reduce the risk of over-reliance on the State of Illinois for matching Federal transportation planning funds.

While the structure of the MPO Policy Committee and the CMAP Board is outlined on CMAP’s website, the Review Team recommends CMAP continue to develop how it publicly explains the roles and responsibilities of the MPO Policy Committee and the CMAP Board, with a goal being easier general public consumption. The Review Team strongly supports CMAP’s introduction of dues for participating stakeholders and encourages the MPO to continue to explore additional revenue options.

The Council of Mayors Planning Liaison program should be further evaluated to ensure the scope of work is appropriate, accountability measures are in place, necessary communication and support is provided by the MPO, and that expectations between the Council of Mayors and CMAP are aligned.

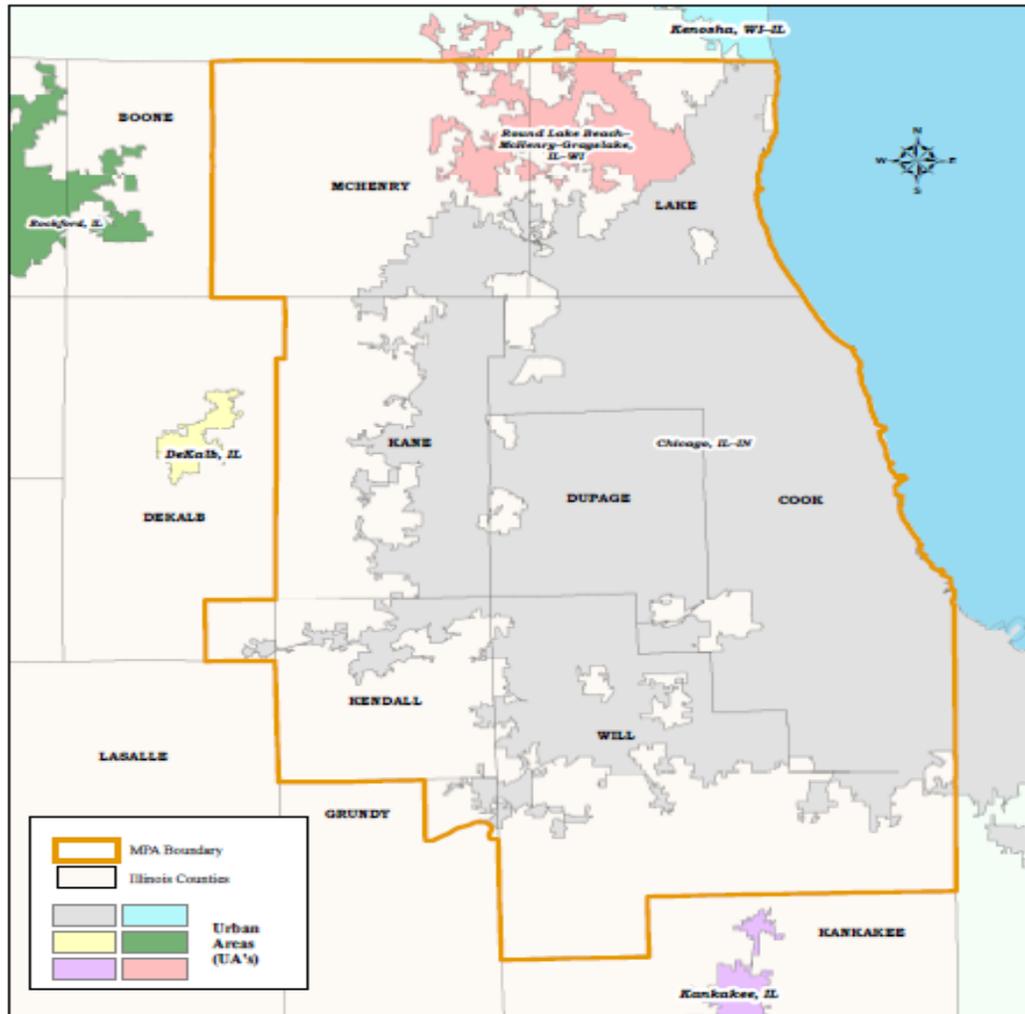
Section 2-2: Metropolitan Planning Area Boundaries

Regulatory Basis: The metropolitan planning area boundary (MPA) refers to the geographic area in which the metropolitan transportation planning process must be carried out. The MPA shall, at a minimum, cover the Census-defined, urbanized areas (UZAs) and the contiguous geographic areas likely to become urbanized within the 20-year planning horizon of the MTP. In accordance with 23 U.S.C. 134 (e), the boundary should foster an effective planning process that ensures connectivity between modes and promotes overall efficiency.

Status: Based on the 2010 U.S. Census, in March 2013 the CMAP Board and MPO Policy Committee voted to expand CMAP’s Metropolitan Planning Area to include the Sandwich and Somonauk townships of DeKalb County. According to Census projections, these contiguous geographic areas are likely to become more urbanized within the next 20 years. The Illinois Governor approved the expanded MPA in September 2014.

The updated MPA includes all of Cook, DuPage, Kane, Kendall, Lake, McHenry, Will and parts of DeKalb and Grundy counties. The MPA fully incorporates both the Census-defined UZA and

**Chicago Metropolitan Agency for Planning:
Metropolitan Planning Area Boundary**



most of the EPA-defined nonattainment area for Ozone and PM2.5 within the region. The Township of Goose Lake in Grundy County is not included in the MPA but is identified as part of the Ozone and PM2.5 non-attainment areas. CMAP, Grundy County, IDOT and the Illinois EPA signed an MOU in 2009 outlining their coordination efforts.

Portions of the Chicago, IL-IN urbanized area extend into northwest Indiana. By agreement, the Northwestern Indiana Regional Planning Commission assumes responsibility for these areas. By a similar agreement, the Southeastern Wisconsin Regional Planning Commission assumes responsibility for the portion of the Round Lake Beach-McHenry-Grayslake, IL-WI urbanized area that extends into Wisconsin.

Using the MPA and UZA resulting from the 2010 Census, IDOT worked closely with the Counties, Council of Mayors, and City of Chicago to update countywide functional classification maps in 2015 and 2016. Revisions to the National Highway System for Cook, DuPage, and Kane Counties were most recently approved by FHWA in 2015.

On December 15, 2016, the U.S. DOT issued its final rule on MPO Coordination and Planning Area Reform. If enacted this rule would have substantially changed the planning process in the region, impacting not only CMAP but their MPO counterparts in northwest Indiana and southeast Wisconsin. The CMAP organized and led a coalition of its neighboring MPOs as well as the Illinois Congressional delegation to help education and inform U.S. DOT as well as Congress of the ramification of this ruling. Thanks in no small part to the efforts made by the region Congress repealed the rule in April 2017.

Finding: The CMAP satisfies the regulatory requirements for the metropolitan planning area boundaries.

As Census 2020 approaches, CMAP should consider the impacts of a likely expansion of the Census-defined UZA. Initiating discussions with neighboring communities, counties, and urbanized areas prior to the Census may be appropriate to help prepare for opportunities and challenges.

The IDOT is commended for its meticulous approach to leading a systematic review and update of countywide functional classification maps.

The CMAP and the Illinois Congressional delegation demonstrated national leadership in consideration of MPO Coordination legislation.

Section 2-3: Agreements and Contracts

Regulatory Basis: In accordance with 23 U.S.C. 134 and 23 CFR 450.314, MPOs are required to establish relationships with the State and public transportation agencies through specified agreements between the parties to carry out a continuing, cooperative, and comprehensive metropolitan planning process. The agreements must identify the mutual roles and responsibilities and procedures governing their cooperative efforts. If applicable, these agreements must identify the designated agency for air quality planning under the Clean Air Act and address the responsibilities and situations arising from there being more than one MPO in a metropolitan area.

The May 27, 2016, Final Planning Rule requires that a written agreement be developed cooperatively by MPOs, States, and transit providers describing their mutual responsibilities for

carrying out performance based planning and programming in metropolitan areas (23 CFR 450.314(h)). The agreements are to include written provisions for:

- Coordination on target setting
- Data collection
- Data Analysis
- Report on progress toward target achievement
- Data collection for National Highway System (NHS) asset management plan

The written procedures may be included as part of the metropolitan planning agreement or documented in some other means outside of the metropolitan planning agreements. To the extent possible, a single agreement between all responsible parties is encouraged for each metropolitan area. The Statewide and Metropolitan Planning Final Rule also established a two-year phase-in period for the implementation of written procedures based on the effective date of the associated performance measure rule. This means that after two years from the effective date of each performance measures rule, States and MPOs can only adopt an update, amendment, or conformity determination for a MTP, STIP, or TIP if it has been developed according to the provisions and requirements of the Final Planning Rule.

Status: The planning process is administered in accordance with six intergovernmental agreements:

1. Cooperative Agreement for Coordination of Land Use-Transportation Planning in the Chicago/Gary/Lake County, IL-IN Urbanized Area (2016)
2. Cooperative Agreement for Coordination of Land Use-Transportation Planning in the Round Lake Beach-McHenry-Grayslake, IL-WI Urbanized Area (2009)
3. The CMAP/Illinois Environmental Protection Agency Intergovernmental Agreement for Coordination of Air Quality Related Transportation Planning (2009)
4. Transportation/Air Quality Planning Agreement for Goose Lake Township (2009)
5. The CMAP/IDOT/RTA and Service Boards Agreement Concerning Planning and Federal Performance Measures (2018)
6. Intergovernmental Agreement Between IDOT and CMAP Concerning Federal Performance Measures (2018)

Each agreement is publicly available on the CMAP website. These documents are revisited by the partner agencies as Federal authorizations and/or regulations evolve. Currently, the Round Lake Beach cooperative agreement update is pending final sign off.

Finding: The MPO satisfies the regulatory requirements for agreements. Please see Section 2-9 Transportation Improvement Program Development and Project Selection for further related recommendations.

Based on the passage of the FAST Act, the planning partners are encouraged to review the older agreements in place to ensure that ongoing roles and responsibilities are consistent with regional, state, and Federal expectations. Specifically, the Review Team highly recommends CMAP work closely with Wisconsin DOT to finalize the updated agreement for the Round Lake Beach-McHenry-Grayslake, IL-WI Urbanized Area.

As the transit Service Boards work to complete their TAM plans, CMAP is strongly encouraged to work with RTA and the boards to establish a strong target development process.

Section 2-4: Unified Planning Work Program

Regulatory Basis: The MPOs are required to develop in TMAs to govern work programs for the expenditure of FHWA and FTA planning and research funds (23 CFR 450.308). The UPWP must be developed in cooperation with the State and public transit agencies and include the required elements.

Status: The MPO cooperatively develops an annual UPWP that discusses the transportation planning priorities, budget, and scope of work for the fiscal year, (July 1- June 30). All FHWA PL and FTA 5303 funds provided to participating agencies are granted on an 80 percent Federal 20 percent local basis. The MPO has long relied almost exclusively on State funding to provide its share of local matching funds. As discussed under Section 2-1: MPO Organizational Structure, CMAP has recently begun collecting dues in part to diversify their funding sources.

The UPWP is annually developed through the CMAP UPWP Committee whose eight voting members include 1) the City of Chicago, 2) CTA, 3) Metra, 4) Pace, 5) CMAP, 6) RTA, 7) the Regional Council of Mayors, and 8) one representative from the six collar counties. The IDOT chairs the committee and votes in instances of a tie. Non-voting members include Illinois EPA, FHWA and FTA. Member agencies traditionally receive UPWP funding, but any other MPO Policy Committee member agency can submit proposals or sponsor submissions from other entities.

Finding: The MPO satisfies the regulatory requirements for the UPWP.

The format of the UPWP is acceptable and the description of the work to be undertaken is thorough. Proposed projects are evaluated according to performance measured agreed on by the committee whose recommendations are taken to the Transportation Committee and ultimately to the MPO Policy Committee for final approval. The UPWP Committee regularly revisits how planning funds are evaluated and allocated. As financial resources become more strained it is critical that the committee continue to evaluate and improve these processes while incorporating performance based planning principles.

Section 2-5: Transportation Planning Process

Regulatory Basis: The scope of the transportation planning process according to 23 CFR 450.306 is defined as continuous, cooperative, and comprehensive while providing for consideration and implementation of projects, strategies, and services that address the following factors:

1. Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency
2. Increase the safety of the transportation system for motorized and non-motorized users
3. Increase the security of the transportation system for motorized and non-motorized users
4. Increase accessibility and mobility of people and freight
5. Protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns
6. Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight
7. Promote efficient system management and operation
8. Emphasize the preservation of the existing transportation system

9. Improve the resiliency and reliability of the transportation system and reduce or mitigate stormwater impacts of surface transportation
10. Enhance travel and tourism

The planning process also is required to provide for the establishment and use of a performance-based approach to transportation decision making to support the national goals described in 23 U.S.C. 150(b) and the general purposes described in 49 U.S.C. 5301(c). The MPOs are to determine performance targets that address the measures established in 23 CFR 490, 49 U.S.C. 5326(c), and 49 U.S.C. 5329(d) in coordination with the State and public transportation providers.

Status: The ten planning factors identified in legislation are identified throughout CMAP's planning processes and products. The TIP, UPWP and long-range comprehensive plan (GO TO 2040) all work to improve the connections between these planning factors and the work CMAP and other transportation agencies perform throughout the region. CMAP has been working to update GO TO 2040 with ON TO 2050, the next comprehensive plan, and has incorporated these principles throughout the planning and development process.

Finding: The MPO satisfies the regulatory requirements for the scope of the transportation planning process.

Section 2-6: Metropolitan Transportation Plan

Regulatory Basis: In accordance with 23 CFR450.324, the metropolitan transportation planning process includes the development of a transportation plan addressing a minimum 20-year planning horizon. The plan needs to include both long-range and short-range strategies and actions that lead to the development of a multi-modal transportation system that facilitates the safe and efficient movement of people and goods while addressing both current and future transportation demand. The plan requires a description of the measures and targets used in addressing the performance of the transportation system and a system performance report that assesses the performance of the transportation system in accordance with 23 CFR 450.306(d).

Status: The region's GO TO 2040 Plan, first adopted in 2010, was updated in accordance with MAP-21 in October 2014. The GO TO 2040 Update included a revised financial plan, listing of major capital projects, socioeconomic forecasts, public engagement campaign, and other technical components while retaining the themes and strategic recommendations of the original 2040 Plan.

The CMAP is currently developing the region's next comprehensive plan, ON TO 2050, with scheduled approval in October 2018. The Plan is advancing three overarching principles that support the regional vision and will be relevant across all the plan's strategies: Resilience, Inclusive Growth, and Prioritized Investment.

As the development of the plan has advanced, an Emerging Priorities Report was released in 2016 and an ON TO 2050 Preview Report was issued in 2017. The Plan development process has also utilized Snapshot Reports that are brief, data-driven summaries of regional trends and conditions as well as longer Strategy Papers to develop CMAP's direction on new topics or explore refinements to GO TO 2040 recommendations. These efforts and other CMAP reports have helped articulate the challenges in the region and drive discussion on preferred strategies.

Snapshot Reports

Regional Economy and Clusters
Travel Trends
Demographic Shifts
The Freight System
Infill and TOD
Transit Trends
Natural Resources

Other Reports

Placemaking
Regional Freight Strategic Direction
Transit Ridership Growth Study
Highway System Performance Trends
Local Food
Non-Motorized Transportation

Strategy Papers

Transportation System Funding Concepts
Integrating Green Infrastructure
Climate Resilience
Highway Operations
Tax Policies and Land Use Trends
Expanding Housing Choice
Reinvestment and Infill
Inclusive Growth
Energy
Lands in Transition
Water Resources
Emerging Transportation Technology
Municipal Capacity
Transit Modernization
Stormwater and Flooding

Additionally, CMAP has undertaken an “Alternative Future” planning process that helped drive public engagement. Each alternative future explored a macro-level trend that is anticipated to shape the region in the decades to come. The five futures include Changed Climate, Walkable Communities, Innovative Transportation, Transformed Economy, and Constrained Resources. All futures considered a growing senior population and increased racial and ethnic diversity and each considered the impacts of major trends on vulnerable populations. Each of the futures identified strategies for CMAP and partners to capitalize on related opportunities or to mitigate negative impacts.

The CMAP historically has defined “Major Capital Projects” as capacity additions to the expressway system or comparable changes to the transit system, generally meaning a rail extension. ON TO 2050 is expanding the view of the region’s transportation system by redefining “Regionally Significant Projects” to be either:

- Highway capacity projects on the NHS and transit capacity projects with separate right-of-way or priority over other traffic that are greater than \$100 million
- State of good repair projects on transit lines or roadways that are at least \$250 million

The analysis of Regionally Significant Projects is ongoing at the time of this review but it is expected that these thresholds provide for a reasonably sized universe of project to be considered in ON TO 2050 and will allow the plan to identify the most critical projects in the region and to focus resources on accomplishing them.

With approval anticipated on October 10, 2018, ON TO 2050 will be required to meet performance based planning and programming requirements for the safety performance measures and for the Transit Asset Management Final Rule. The Plan must include a description of the individual performance measures and targets as well as an evaluation of system performance with respect to the performance targets. Any Plan amendments of new Plans approved after May 20, 2019, will be required to meet the planning requirements for the Second Performance Management Measures Final Rule (PM2) and the Third Performance Management Measures Final Rule (PM3).

Outside of ON TO 2050, CMAP has been tasked by IDOT and the Illinois Tollway to advance another planning process known as the Expressway Vision Study that seeks to create a bold, multi-modal, multi-jurisdictional, modernization program for the region's expressway system. Some aspects of the Vision process may inform ON TO 2050 but specific proposals are not being incorporated as the Vision Study will not be a fiscally constrained analysis. ON TO 2050 is expected to support major policies within the Vision Study such as congestion pricing, public-private partnerships, and the sharing of services and resources.

The CMAP also assisted the RTA's development of "Invest in Transit", the 2018-2023 Regional Transit Strategic Plan for Chicago and Northeastern Illinois. Published in January 2018, this plan incorporates feedback from planning and operating partners, users, as well as CMAP to make the case for pursuing dependable funding streams for transit operations, state of good repair maintenance, and future expansion. The plan utilizes CMAP data and research and compliments the work CMAP has done to promote transit in the both GO TO 2040 and in the work done so far for ON TO 2050.

Finding: The MPO satisfies the regulatory requirements for the metropolitan transportation plan.

The GO TO 2040 Update built upon the successes of the original 2040 Plan and meets or exceeds regulatory requirements for a metropolitan transportation plan. The development of ON TO 2050 has continued to strengthen the region's planning process and should be particularly commended for its expansive public engagement strategy, focus on its three overarching principles, and its enhanced approach to consideration of regionally significant projects.

Section 2-7: Financial Planning

Regulatory Basis: The metropolitan planning statutes state that the transportation plan and TIP (23 U.S.C. 134 (i)(2)(E) and (j)(2)(B)) must include a financial plan that:

- Demonstrates how the adopted Plan/TIP can be implemented
- Indicates public and private resources that are reasonably expected to be made available to carry out the Plan/program
- Recommends any additional financing strategies for need projects and programs

The financial plan should also identify innovative financing techniques to finance projects, programs, and strategies and may include, for illustrative purposes, additional projects that would be included in the approved document if additional resources beyond those identified in the financial plan were available. In cases that the FHWA and the FTA find a Plan or TIP to be fiscally constrained and a revenue source is subsequently removed or substantially reduced (i.e., by legislative or administrative actions), the FHWA and the FTA will not withdraw the original determination of fiscal constraint. However, in such cases, the FWHA and the FTA will not act on an updated or amended Plan or TIP that does not reflect the changed revenue situation. The Clean Air Act's transportation conformity regulations also specify that a conformity determination can only be made on a fiscally constrained long-range transportation plan and TIP (40 CFR 93.108).

Status: The CMAP coordinates with IDOT and the RTA to develop an annual state/regional resources table that documents funding available to program against in the TIP. This table also includes a carryover amount of unobligated funds from the previous fiscal year. Projects are entered into eTIP and are subject to the fiscal constraint of the available resources identified in the table. If an agency's new project or proposed change exceeds the amount of resources available, eTIP will reject the change.

Projects that utilize the financing technique of Advance Construction (AC) are not included in the fiscal constraint determination since these projects are not considered Federal obligations. When a project is converted from AC status, it is considered an obligation and is subject to the fiscal constraint determination. However, CMAP restricts the over programming of local fund sources by treating AC projects as obligated in the state/regional resources table. This approach does not allow over programming of STP-L, CMAQ, or TAP-L funds.

The GO TO 2040 Update financial plan includes budgets for maintaining the system, modernization (including both state of good repair projects and system enhancements), and finally for capacity expansion (the major capital projects). Core revenue (\$332.5B) over the plan horizon nominally exceeded expenditures for operating, administering, and maintain the transportation system (\$329.1B). In order to include and fiscally constrain desired modernization and expansion activities, an additional \$38.8B was identified through reasonably available revenues.

While the ON TO 2050 Plan is still under development, essential elements of the financial plan have advanced. It has been determined that core revenues will not be sufficient to operate and maintain the transportation system and that reasonably available revenue sources should be aggressively pursued. The MPO Policy Committee and the CMAP Board established a Subcommittee on Transportation Revenue to refine expectations for reasonably available revenue sources and to coordinate implementation strategies. Implementing these revenue sources requires advocacy from many public, civic, and private sector partners to encourage policy and statutory changes at the Federal, State, and local level.

Certain funding sources, like congestion pricing, tolling, public-private partnerships, and value capture are specific to particular projects. In the financial plan, they will be used to offset the public cost of specific Regionally Significant Projects as opposed to being included as reasonably available revenue.

Finding: The MPO satisfies the regulatory requirements for financial planning.

The CMAP and IDOT should formalize the process to document and agree to the carryover amount identified in the TIP. Simple adoption of the TIP or TIP amendments by the MPO should not be considered to endorse this carryover total.

The MPO has proceeded responsibly in considering reasonably available revenue sources for the ON TO 2050 Plan. Identifying strategies and next steps for implementation is crucial to the validity of these sources as previous plans have often targeted revenue sources that have not come to fruition.

Section 2-8: Air Quality and Transportation Conformity

Regulatory Basis: Section 176 (c)(1) of the Clean Air Act Amendments of 1990 (CAAA) states: “No metropolitan planning organization designated under section 134 of title 23, United States Code, shall give its approval to any project, program, or plan which does not conform to an implementation plan approved or promulgated under section 110”. The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) subsequently included provisions in response to the CAAA mandates. Implementing regulations since then have maintained this strong connection between air quality and transportation programs. Provisions governing air quality related transportation planning are incorporated in a number of metropolitan planning regulations rather than being the primary focus of one or several regulations. For MPOs that the U.S. EPA

classifies as air quality nonattainment or maintenance areas, many special requirements apply to the transportation planning process. These include formal agreements to address air quality planning requirements, requirements for setting metropolitan planning area boundaries, interagency coordination, MTP content and updates, CMP requirements, public meeting requirements, and conformity findings on MTPs and TIPs.

Status: The Chicago-Naperville, IL-IN-WI region remains in nonattainment (moderate) with the 2008 ozone standard. In 2015, the U.S. EPA strengthened the national air quality standards for ground-level ozone to a standard of 70 parts per billion (ppb) averaged over 8-hours. The Final Rule that establishes the nonattainment boundaries under this 2015 standard is expected to become effective in the Summer of 2018.

The Northeastern Illinois region is currently considered in attainment status with the 2012 particulate matter standards. It had been anticipated that the region's previous nonattainment status would not change as the 2012 standard was formalized however Illinois' 2012-2014 monitoring data did not pass quality control tests which necessitated a designation of "unclassifiable". Because this categorization cannot be considered nonattainment or maintenance, the region was deemed as attainment when US EPA's final rule designating nonattainment areas for the 2012 PM2.5 NAAQS became effective in April 2015.

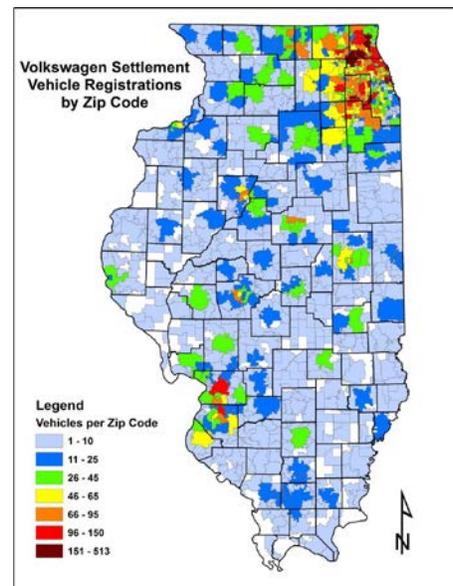
The region's current conformity determination covers the GO TO 2040 Plan Update and FY 2014 – 2019 TIP. The conformity analysis is updated semi-annually with these updates initiated by the submittal of TIP changes by project sponsors. Conformity analysis is supported by socioeconomic forecasts and travel demand documentation.

Interagency consultation involves CMAP, RTA, IDOT, the Northwest Indiana Regional Planning Commission (NIRPC), Illinois EPA, FHWA, FTA, U.S. EPA and other members of local transportation implementing agencies and other stakeholders as needed. The region has an established consultation process that consists of two levels, or "tiers". Tier 1 participants include representation from Federal headquarters offices while Tier 2 participants include representatives from EPA Region V, FTA Region V, and the FHWA Illinois Division. The Tier 1 team is convened in the event the Tier 2 team is unable to resolve a particular issue. The Tier 2 Consultation Team reaches decisions through consensus and guides the MPO in establishing conformity determinations and concurring on regulatory interpretation.

Other notable activities during this certification cycle with air quality planning implications include:

- A special conformity amendment was advanced in 2016 outside of the regular semi-annual process for the Interstate 290 Reconstruction project.
- In 2016 as part of the ongoing State budget impasse, the Illinois EPA stopped mailing emissions test reminders to vehicle owners in the State's nonattainment areas. The Illinois Secretary of State's office also allowed these drivers who skipped the I&M testing program to register their vehicles to avoid penalizing the public for Illinois' budget crisis. The U.S. EPA notified the Illinois EPA that these changes deviate from the Illinois ozone State Implementation Plan and could have potentially serious consequences. The notices and testing regulations were reinstated after approximately three months.

- Volkswagen AG and some of its North American subsidiaries (collectively "VW") have entered into a multi-billion dollar settlement with the Federal government for violations of the Clean Air Act. Settlement funds are to be used as a remedy to mitigate the environmental impacts from VW's actions and consists of a vehicle recall and repair program, a \$2 billion commitment to support the use of zero emissions technology (battery electric vehicles, plug-in hybrid electric vehicles, fuel cell vehicles and charging infrastructure) over the next 10 years, and an Environmental Mitigation Trust Fund that provides \$2.9 billion to the states to fund projects that reduce nitrogen oxide emissions. The Illinois EPA has been designated as the lead agency to administer funds allocated to Illinois from the Volkswagen Environmental Mitigation Trust and has released a draft Beneficiary Mitigation Plan.



Finding: The MPO satisfies the regulatory requirements for the transportation conformity process.

Project specific special conformity amendments sought outside the established semi-annual process may introduce unnecessary procedural challenges to high profile projects. It is the preference of US DOT for implementers to follow the semi-annual process unless truly extraordinary circumstances warrant special action. Alternatively, the planning partners could re-examine the semi-annual process and consider more frequent regular analysis cycles.

Section 2-9: Transportation Improvement Program and Project Selection

Regulatory Basis: 23 CFR 450.326 requires the MPO to develop a TIP in cooperation with the State and public transit operators. The TIP needs to cover a minimum of four years and be compatible with the STIP development and approval process. The TIP should include capital and non-capital surface transportation projects, bicycle and pedestrian facilities and other transportation enhancements, Federal Lands Highway projects, and safety projects included in the State's Strategic Highway Safety Plan. The TIP must include all regionally significant projects regardless of funding source and they must be consistent with the MTP and be included in air quality analysis in nonattainment and maintenance areas. The TIP is intended to link investment priorities to system performance and is required to include a discussion of the anticipated effect of the program toward achieving performance targets.

Status: The MPO develops a TIP in cooperation with the State and public transit operators that serves as the regional agenda for surface transportation projects. The large and dynamic nature of the transportation program in Northeastern Illinois necessitates regular amendments to the TIP. Thresholds have been established to differentiate TIP amendments from administrative modifications. Amendments requiring an air quality conformity determination are approved twice a year by the MPO Policy Committee while amendments not requiring conformity have been delegated to the CMAP Transportation Committee for review and action. The Transportation Committee meeting schedule is structured to correspond with the IDOT letting schedule and its associated milestones and deadlines so that project sponsors have the maximum opportunity to submit amendments and avoid delays of project authorizations.

The CMAP has administered an electronic TIP database for several years but in response to increasing technical challenges with the data and evolving regulations and expectations, the agency issued a request for proposals for “an integrated transportation planning, programming, and tracking data and visualizations solution”. The CMAP selected a Software as a Service platform from an experienced vendor that provides a proven product which can be customized to the unique needs of the CMAP region. The CMAP phased in this new eTIP database throughout 2016.

The eTIP has separate secure and public sites with different URLs that utilize the same back end data. The public site displays the current approved version of TIP projects, pending amendment reports, a comprehensive search page, a summary of projects by county, and an interactive map displaying TIP projects and system performance data. Data is entered and updated by CMAP and project sponsors through the secure site which also provides authorized users access to project data including attached documents and FHWA obligation information that is updated nightly via a direct connection to the FHWA FMIS database. The eTIP also provides an integrated Call for Projects module which permits project sponsors to submit project applications from within the database which was used for the CMAQ and TAP programs in 2017. Furthermore, the amendment approval process has been streamlined with automated notifications and electronic approvals for State and Federal reviewers.

Surface Transportation Block Grant Program

The northeastern Illinois portion of Surface Transportation Block Grant (known as STP) funding has historically been suballocated according to an agreement among the MPO Policy Committee, the City of Chicago, and the Council of Mayors Executive Committee. This agreement has provided the individual councils and the City of Chicago responsibility for programming funds within their areas. The agreement has generally been renegotiated with the passage of new Federal transportation bills and the basic arrangement is a holdover from the former Federal-aid Urban program that began in the 1970s. In 2013, the agreement was reaffirmed and provided for regional funding in the following manner:

- 5 percent for one or more regional projects as selected by the City of Chicago and endorsed by the Council of Mayors Executive Committee that benefits both the City and the suburbs
- 45 percent of the remaining 95 percent to be programmed by the City of Chicago
- 55 percent of the remaining 95 percent to be programmed by the individual Council of Mayors which is then further subdivided by council population where then each council has responsibility for implementing project selection methodology

The current annual allotment to the northeastern Illinois region for STP programming is approximately \$130 million. The use of negotiated percentages and a division of funds by population does not directly address the performance of the region’s transportation system or correlate funding to system needs. The 2014 U.S. DOT Certification Review found that the region should not use non-performance based methods to allocate funds and called for the region to examine of the process.

In 2017, a working group was formed to examine the future of the program that agreed to basic program principles including support for regional priorities, an equitable, transparent, and data driven process, and predictable funding. These principles were refined over several months and a proposal was drafted that included four principal elements.

1. A Shared Fund programmed through regional competition would be established using a set-aside of the region's annual STP allotment. This would enable larger, regional significant projects to be funded which was difficult under the previous agreement due to the size of individual council allocations and policies that limit or cap individual sponsors or projects.
2. After the set-aside for the Shared Fund, the remainder of the region's annual STP allotment would be distributed to the City of Chicago and the Council of Mayors through a performance based formula that considers pavement condition, bridge condition, congestion, safety, and Single Occupancy Vehicle travel.
3. To encourage investments that support the goals of ON TO 2050, each individual council and the City would assign at least 25 percent of the points in their project selection methodologies between any or all of the regional priorities of green infrastructure, reinvestment, freight movement, economically distressed areas, complete streets, and transit supportive density.
4. The use of active program management practices encourages timely expenditure and ensures that projects that are ready to proceed can move forward. The region has successfully implemented active program management policies for the CMAQ and TAP programs.

This proposal and the creation of a STP Project Selection Committee was approved through an MOA by the MPO Policy Committee in late 2017. These changes are to be phased in to honor commitments to previously programmed projects and to establish the Shared Fund with these new procedures in place for FFY 2020 funding. The STP Project Selection Committee is meeting through 2018 and 2019 to develop Shared Fund selection methodology and active program management policies specific to the STP program. Concurrently, necessary data collection continues for performance based distribution of funding and the establishment of pavement management systems.

Other important considerations of the new agreement are to ensure that all communities within the region have reasonable access to Federal funds without an undue burden caused by a lack of resources for required local matching funds. Consequently, eligible communities would be permitted to request TDCs in lieu of required local match for the construction phase of projects. Additionally, there are to be several opportunities for public engagement to further transparency in decision making and to support the Illinois Grant Accountability and Transparency Act (GATA).

Congestion Mitigation and Air Quality Improvement Program and Transportation Alternatives Set-Aside

The CMAP programs CMAQ and TAP funds through the MPO Policy Committee with the development and review of each program overseen by the CMAQ Project Selection Committee. The CMAP staff performs technical analyses of all projects and oversees the implementation of the programs and IDOT administers each program's funding.

The two programs are administered through a concurrent call for projects every two years with CMAQ projects supporting localized congestion relief, operational improvements, mode shift, and direct emissions reduction while TAP supports non-motorized transportation projects. The CMAQ and TAP development process builds multi-year programs that are subject to active program management policies that focus on accelerating project implementation. Neither CMAQ or TAP fund Phase 1 engineering except in cases where sponsors request such funding based on a fiscal hardship that is determined from an evaluation of municipal median income, tax base per capita, total tax base, and population.

Through the application of active program management policies, the State's unobligated balance of CMAQ funds dropped from \$195 million at the end of FFY 2013 to \$121 million at the end of FFY 2015 (CMAP's share of the State's balance is typically around 95 percent). However, obligation targets have not been met the past two years and the balance stands at \$140 million at the end of FFY 2017. Multiple explanations exist for project delays but two trends are noteworthy:

- An increase in the number of large projects have been selected for the program through the last several programming cycles. These projects can be more susceptible to delay and are more difficult to replace in the active year of the program if the project is delayed.
- Diesel engine retrofits, alternative fuel, and vehicle projects have experienced difficulty obtaining Buy America waivers.

The U.S. DOT supports both the programming of larger, catalytic projects and the programming of direct emission reduction projects that provide substantial particulate matter emissions reductions. The \$140 million unobligated balance at the end of FFY 2017 also includes \$52 million obligated under Advance Construction. If those funds were converted, the unobligated program balance would be below one year of Federal apportionment for the State (approximately \$110 million).

On May 20, 2017, an FHWA final rule took effect that established performance measures State DOTs and MPOs would use to report on the performance of the NHS, freight movement on the Interstate system, and traffic congestion and on-road mobile source emissions for the purpose of carrying out the CMAQ program. IDOT will need to establish targets by May 20, 2018 for all measures under this rule and CMAP will have an additional 180 days to establish their targets. MAP-21 also requires a CMAQ Performance Plan for TMAs over one million in population that are nonattainment or maintenance. While U.S. DOT has not yet released guidance related to this plan, it is expected that the CMAQ performance plan and its biennial updates would be submitted within the same timeframe as the state performance reports.

While the published final rule includes a measure on the percent change in CO2 emissions from 2017 generated by on-road mobile sources on the NHS (the GHG measure), the effective date of the portions of the Final Rule pertaining to that measure has been delayed.

Section 5307

The FTA's 5307 Urbanized Area Formula Funding program provides Federal resources to large urbanized areas for transit capital assistance. The RTA for Northeastern Illinois must annually pass a budget that includes capital and operating funds for the region's three transit providers (known as Service Boards) for which Federal formula funds make up the vast majority of the capital program. On an annual basis, the RTA coordinates with the NIRPC to determine the sub-allocation amounts by state for transit formula funds in the Illinois and Indiana portions of the Chicago, IL-IN UZA. Comparably, the RTA collaborates with the Southeastern Wisconsin Regional Planning Commission to identify the transit formula funding sub-allocations in the Illinois and Wisconsin portions of the neighboring Round Lake Beach-McHenry-Grayslake, IL-WI UZA. Section 5310 Enhanced Mobility for Seniors and Individuals with Disabilities is divided between the three MPOs based on population. The process of dividing these funds is outlined in agreements between the states and MPOs and culminate in annual allocation agreements.

The RTA then proceeds to sub-allocate the Northeastern Illinois FTA formula funds, including 5307, 5337 State of Good Repair, and 5339 Bus and Bus Facilities between the RTA's Service Boards, consisting of CTA, Northeast Illinois Regional Commuter Railroad Corporation (Metra), and Pace Suburban Bus (Pace). The RTA and the operators reach an agreement annually on how to divide up these funds. This process is not outlined in any public documentation. The RTA has stated these allocations are based on population, transit ridership, capital asset condition assessments, other demographic factors, and general funding need.

RTA uses a Capital Optimization Support Tool to assist the operators in prioritizing capital investment needs to align with regional funding and long term strategic objectives. Each Service Board annually submits a Business Plan to RTA which is then incorporated into RTA's Capital Program as well as its five-year capital plan. This plan mirrors the projects that the Service Boards individually incorporate into the TIP, which describes the various transit funding programs and includes an MPO resolution recognizing authority of the operators to receive the sub-allocations.

Finding: The MPO satisfies the regulatory requirements for the TIP and project selection processes.

The CMAP is commended for the successful implementation of eTIP. Planning partners are strongly encouraged to support future enhancements and refinements to eTIP by providing data and information that supports improved data visualization, public transparency, and integration of programming and performance measures. Likewise, CMAP is encouraged to continue to be sensitive to the needs of partners with large numbers of individual projects and the time and resources that may be required to respond to requests for additional information.

The MOA regarding the distribution and active program management of regional STP funds is a significant step towards performance based planning and programming in the metropolitan region. This process has required extraordinary coordination and cooperation among the region's planning partners and local governments and may serve as a national model for effective programming reform.

The State of Illinois is highly commended for its support for the STP reform process by seeding the Shared Fund with \$75 million of previously unobligated Federal funding over FFYs 2020-2022 and by supporting the use of TDCs for disadvantaged communities. It is unlikely that the reform process could succeed without these commitments.

It is critical to the long-term success of the STP programming process that IDOT and CMAP continue to work closely to reconcile accounting of STP accomplishments and unobligated funds that are commonly referred to as the carryover balance. It is recommended that IDOT and CMAP jointly submit the agreed to carryover balance to the STP Project Selection Committee on an annual basis for their formal concurrence.

It is recommended that CMAP, RTA, and the Service Boards work to provide further transparency in the FTA 5307 Urbanized Area Formula program sub-allocation process. With CMAP's expanding role in performance measurements and target setting on the regional level that tie into the TIP, the region would be well served if CMAP further engaged in the early development of the transit service board capital programs.

The CMAQ and TAP programs continue to be effective models of performance based programming. As the region establishes its CMAQ Performance Plan and performance targets, continued emphasis should be placed on projects that demonstrate high cost effectiveness.

The unobligated balance of CMAQ funds presents an area of fiscal risk to the region. Unobligated balances are susceptible to Federal rescissions which can occur through the annual appropriate process such as in 2017 or through authorizing legislation such as the FFY 2020 \$7.6 billion rescission identified in the FAST Act. While CMAP and IDOT effectively worked together to optimize the State's use of available federal funding and reduce the loss of apportionment during the FFY 2017 rescission, all implementing partners are encouraged to aggressively work towards advancing projects to completion to maximize funding and the realization of air quality and congestion mitigation benefits.

Section 2-10: Public Outreach and Participation

Regulatory Basis: Sections 134(i)(5), 134(j)(1)(B) of Title 23 and Section 5303(i)(5) and 5303(j)(1)(B) of Title 49, require a 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, which requires 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 periodically reviewing the effectiveness of the participation plan.

Status: The CMAP is proactively engaged in promoting and seeking public involvement early and continuous throughout the planning process in the development of regional plans and programs. The CMAP meets with many community organizations with emphasis on minority and economically disadvantaged communities throughout the seven-county region. The outreach efforts utilized by CMAP to engage the public includes: social media, establishing networks and contacts, going into targeted communities, working with organizations that serve minority and disadvantaged populations, getting on agendas of existing community organizations meetings, conducting workshops, and establishing community partnerships.

In the development of the long-range plan, ON TO 2050, CMAP conducted over 200 community workshops and other events to engaged residents in discussion about regional challenges and opportunities. The CMAP presented to the residents in the metropolitan area several assumptions on micro-trends (climate change, walkable communities, innovative transportation, constrained resources, and transformed economy) that will shape the future of the region for their input on strategies and priorities for addressing those trends. Other efforts utilized by CMAP as part of its public engagement efforts across the seven-county region included: online surveys, interactive iPad kiosks, in-person workshops, web and social media, and participation in regional events. The feedback received from the above efforts were considered in the development of the long-range plan and is documented in the ON TO 2050 Alternatives Futures Engagement Summary.

Another public engagement effort by CMAP is designed to solicit feedback from residents and stakeholder groups on several alternative future scenarios and planning strategies for the region. This Alternative Futures program is intended to encourage residents to express their priorities for the future of the region. The CMAP developed a variety of ways for the public to be involved in this effort including surveys, workshops, and online participation.

The CMAP conducted additional outreach to students in all levels of education in several regional schools and youth serving programs through classroom focus groups, participation in school career days and sustainability fairs.

The CMAP collaborates with planning partners to identify community organizations that serve residents in minority and economically disadvantaged communities. The CMAP provides grants and training to these organizations to engage their residents and constituents in workshops discussions to obtain their input during the planning process and the development of the long-range plan. The CMAP has identified economically disconnected areas which include places with concentrations of low-income residents who are also either minorities or have limited English proficiency for input into the ON TO 2050 plan. The CMAP also considers other vulnerable groups, including those who are transit-dependent, elderly, and persons with disabilities in the development of GO TO 2050.

From the above public engagement efforts, CMAP has compiled volumes of data on comments from the public to identify priorities, themes, and concerns about various issues and has used this data as a source of information in the development of the long-range plan.

The CMAP public participation plan was updated in 2013 and is currently undergoing another update. The public participation plan serves as a guide to help inform the public on how CMAP operates, describes the public participation process and outlines strategies for increasing public information and participation in the planning process.

The organization structure of CMAP is a tiered committee structure that includes two governing boards (CMAP Board and MPO Policy Committee), three advisory boards, two coordinating committees, and six working committees (See Section 2-1 MPO Organizational Structure). The committees within this tiered structure share relevant information, data, or comments on planning issues in the metropolitan area. The minutes and pertinent materials of all committee meetings are posted on the CMAP website. The Citizens Advisory Committee plays an important role in providing input obtained from the public to the MPO Policy Committee and the CMAP Board on proposed plans and policies. The MPO Policy Committee (the federally designated MPO) and CMAP Board have established a shared process for regional planning decision making that is formalized in a Memorandum of Understanding. Each of the boards has representation on the other board to ensure communication exist at the policy level.

Finding: The MPO satisfies the regulatory requirements for the public involvement process.

The CMAP is commended for proactively employing innovative techniques to engage public participation from all segments of the community in the northeastern Illinois metropolitan area and its efforts to specifically reach out to minority and economically disadvantaged communities in its planning process. A few of these techniques include: MetroQuest, an interactive community engagement software, in-person workshops, on-line surveys, Facebook, Twitter, interactive iPad kiosks, and educational videos in English and Spanish.

Section 2-11: Self-Certification

Regulatory Basis: Self-Certification is required under 23 CFR 450.334 at least once every four years to demonstrate that the metropolitan planning process is addressing the major issues facing the area and is conducted in accordance with all the applicable requirements of 23 CFR 450, Subpart C and:

- 23 U.S.C. 134 and 49 U.S.C. 5303

- In nonattainment 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
- Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000d-1) and 49 CFR Part 21; 49 U.S.C. 5332, prohibiting discrimination on the basis of race, color, creed, national origin, sex, or age in employment or business opportunity
- Section 1101(b) of the FAST Act (Pub. L. 114-357) and 49 CFR Part 26, regarding involvement of disadvantaged business enterprises in U.S. DOT funded projects
- 23 CFR Part 230, regarding the implementation of an equal employment opportunity program on Federal and Federal-aid highway construction contracts
- 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; 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
- Section 324 of Title 23 USC, regarding the prohibition of discrimination based on gender
- Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and 49 CFR Part 27 regarding discrimination against individuals with disabilities
- All other applicable provisions of Federal law (e.g., while no longer specifically noted in a self-certification, prohibition of use of Federal funds for “lobbying” still applies and should be covered in all grant agreement documents (see 23 CFR 630.112)).

Status: The CMAP has an approved TIP, MTP, UPWP, CMP, PPP, required interagency agreements, approved metropolitan planning area boundary, and annual listing of obligated projects. Section I and Appendix H of the Unified Work Program document how the state and local officials participate in the planning process to meet conformity requirements of the Clean Air Act. Appendix B of the 2018 UPWP provides a description of how the affected member agencies, including CTA, Metra, Pace and IDOT, meet the provisions of the Americans with Disabilities Act of 1990, the Older Americans Act, and Title VI of the Civil Rights Act of 1964. Appendix B also outlines how the affected member agencies: prohibit discrimination on the basis of race, color, creed, national origin, sex, disability, or age in employment or business opportunity; involve disadvantaged business enterprises; and implement an equal employment opportunity program in relation to U.S. DOT funded projects.

Every four years prior to the planning certification review process CMAP self-certifies that they are implementing the metropolitan planning process in accordance with applicable federal requirements. A memorandum outlining the Federal requirements is provided to the Transportation Committee for review and then the MPO Policy Committee for final approval. The most recent Self-Certification was approved on June 8, 2017.

Finding: The MPO satisfies the regulatory requirements for self-certification.

Section 2-12: Title VI and Nondiscrimination

Regulatory Basis: Title VI of the Civil Rights Act of 1964, Executive Order (E.O.) 12898 on Environmental Justice (EJ), and other nondiscrimination authorities protect diverse segments of the population which may be at risk of being unduly impacted by, or which have been historically underrepresented within, the transportation decision making process. Title VI bars intentional discrimination (i.e., disparate treatment) as well as disparate-impact discrimination stemming from neutral policy or practice that has the effect of a disparate impact on protected groups based on race, color, or national origin. E.O. 12898 directs Federal agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. In compliance with this E.O., U.S. DOT and

FHWA issued orders to describe how EJ principles should be integrated into existing operations and FTA issued Circular 4703.1 to provide recipients of FTA financial assistance with guidance on how to incorporate EJ principles into plans and projects.

Status: The CMAP's policies and procedures for addressing nondiscrimination is compliant with 23 CFR 450.334(a)(3), Title VI of the Civil Rights Act of 1964 and the requirements of 23 CFR 450.210 and 23 CFR 450.316 which identifies requirements for public involvement in the metropolitan and statewide transportation planning process.

The UPWP documents CMAP's compliance with the Federal Title VI Requirements and Guidelines under FTA Circular 4702.1B. The CMAP also utilizes the self-certification process for asserting its compliance with Title VI requirements.

The CMAP's planning process incorporates Title VI considerations in the development of its transportation planning documents. The CMAP works through its committee structure and its partner agencies and the public to ensure that benefits and burdens caused by the region's transportation investments and policies are distributed throughout the region regardless of age, gender, income, race, ethnicity, culture, religious beliefs, sexual orientation or disability status. The CMAP has not received any Title VI or other nondiscrimination complaints since the last certification review.

Finding: The MPO satisfies the regulatory requirements for Title VI and Nondiscrimination.

The CMAP is commended for its emphasis on inclusive growth in the development of ON TO 2050 and for consideration of lower capacity communities throughout various MPO programming processes.

Section 2-13: Congestion Management Process

Regulatory Basis: 23 USC 134(k)(3), 49 USC 5303(k)(3), and 23 CFR 450.322 set forth requirements for the CMP in TMAs where the States and the MPOs must develop a systematic approach for managing congestion through a process that provides for 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 strategies.

Status: The Chicago region is consistently ranked as one of the most congested regions in the United States. Congestion costs billions of dollars annually in wasted time and fuel, decreased productivity, inefficient freight movements, and pollution. The region's congestion management planning is largely an outcome of the planning processes for GO TO 2040 and now ON TO 2050. As such, the region has prioritized strategies such as implementing congestion pricing, emphasizing maintenance and operations, improving the competitiveness of transit, and harnessing technology.

The CMP is intended to serve as the region's guide to comprehensively address congestion that users experience on the transportation system. The CMP includes the basic elements identified in federal guidance including the development of objectives, establishment of multi-modal performance measures, data collection and performance monitoring, strategies to manage congestion, implementation strategies and program evaluation. Performance measurement is a major element of the CMP and data is critical to improving the system. The CMAP relies on a robust intelligent transportation systems infrastructure, last updated in January 2015, to

effectively analyze congestion and changes over time. The use of such data has largely supplanted regional model information as the primary data source for these activities at CMAP.

The CMAP worked with the Northeastern Illinois RTOC to identify the Chicago Region Congestion Management Highway Network--a network of highways critical for the region's mobility where performance measurement activities should be focused. This network, consisting of the NHS, the Strategic Regional Arterial System, and GO TO 2040 capital additions, includes all regional expressways, other principal arterials, and NHS intermodal connectors. The CMP also identifies a freight rail network, consisting of rail mainlines with six or more estimated freight trains per day, CREATE Program Corridors, and Chicago Regional Environmental and Transportation Efficiency (CREATEP Program highway-rail grade separations. The CMP transit service network consists of rail and bus service operated by Metra, the CTA, and Pace Suburban Bus Service, including planned bus rapid transit and express bus services.

Other notable congestion management activities include:

- The IDOT is moving the region toward its first potential uses of congestion pricing with studies advancing consideration of managed lanes on I-55 and I-290.
- The IDOT continues to seek expanding the use of Bus on Shoulders to I-90 and I-57
- The CREATE partners continue to advance projects including uniting to submit the 75th Street Corridor Project as the regional priority for the Infrastructure for Rebuilding America discretionary program.
- The CMAP is developing a vision for metropolitan Chicago's expressway system that is intended to be multijurisdictional, multimodal, and bold in its approach.
- The CMAP continues to prepare data-driven estimates of future traffic patterns at a variety of scales in support of regional transportation planning and capital programming activities.
- The CMAP continues to update the Expressway Atlas to serve a desktop reference of annual average daily traffic volumes and other traffic system statistics.

Finding: The MPO satisfies the regulatory requirements for the congestion management process.

There are a number of congestion related activities advancing through the planning process. A formal update of the CMP document may help re-establish a clearinghouse for information and better ensure that overlapping initiatives are better integrated in multi-disciplinary mobility efforts.

Section 2-14: List of Obligated Projects

Regulatory Basis: The MPO, transportation operators and the State must cooperatively develop a listing of projects for which Federal funds have been obligated in the previous year in accordance with 23 CFR 450.334. The listing must include all federally funded projects authorized or revised to increase obligations in the preceding program year and at a minimum, the following for each project:

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

Status: The CMAP produces an annual “Regional Project Award and Obligations Report for Northeastern Illinois” based on the preceding Federal fiscal year. The report contains summaries of expenditures by project phase, fund source, geographic distribution as well as project category including maintenance, modernization and expansion. The report includes bicycle and pedestrian projects and uses numerous charts to illustrate various data.

The last several Obligated Projects reports have been released well in excess of regulatory deadlines and at irregular intervals:

FY 2017	Not Yet Published
FY 2016	Not Yet Published
FY 2015	June 2017
FY 2014	December 2015
FY 2013	March 2015
FY 2012	January 2014

A considerable contributing factor in the timing of the report’s publication has been the inclusion of non-Federally funded road projects which primarily includes projects funded by IDOT, Illinois State Toll Highway Authority, or Counties. This portion of the report does not include projects solely funded by municipalities or townships. The listing of transit projects also includes federally funded and not federally funded projects.

Finding: The eTIP provides project level obligation information for Federal roadway projects on a real-time basis which reduces concerns with delays in meeting regulatory timeframes for the overall report. The inclusion of non-federally funded projects in the Obligations report is a worthy attempt to provide more complete information to the region’s decision makers. However, the delay in securing and reporting this data minimizes the value of the information. There is no evidence that the planning process uses the results of the Obligations report in any meaningful way. The CMAP should continue to explore ways to make award and obligation data informative and useful to future decision making.

The U.S. DOT recommends that the reporting of data related to project awards, Federal obligations, and performance measurement be reported in some form of annual report on a consistent basis. Moreover, in whatever form this publication takes place it should be highlighted throughout the planning process to help identify whether investments are advancing regional priorities.

Section 2-15: Environmental Mitigation

Regulatory Basis: 23 U.S.C. 134(i)(2)(D) and 23 CFR 450.324(f)(10) require environmental mitigation be set forth in connection with the MTP. The MTP is required to include a discussion of types of potential environmental mitigation activities for the transportation improvements and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan. 23 U.S.C. 168 and Appendix A to 23 CFR 450 provide for linking the transportation planning and the National Environmental Policy Act (NEPA) processes. A Planning and Environmental Linkages (PEL) study can incorporate the initial phases of NEPA through the consideration of natural, physical, and social effects, coordination with environmental resource agencies, and public involvement. This will allow the analysis in the PEL study to be referenced in the subsequent NEPA document once the project is initiated, saving time and money with project implementation.

Status: The CMAP has been a strong leader in adapting sustainability and livability principles into the planning process. ON TO 2040 has Livability as one of its four major themes, with chapters discussing land use and housing, water and energy conservation, improving and expanding open spaces and parks, and promoting sustainable local food. CMAP has also stated that these topics will also be included in the ON TO 2050 plan, as well as greenhouse gas emission reductions, climate mitigation, and brownfield remediation. The new plan will have specific chapters on Land Use and Environment that will emphasize the need for development practices that protect natural resources and that take an integrated approach to water resources.

As part of ON TO 2050 engagement, CMAP has created five “Alternative Futures,” each exploring macro-level economic, technology, environmental, and other trends that will shape the region in the decades to come. Each scenario makes a strong connection between planning and the environment, with the futures exploring Changed Climate, Walkable Communities, Innovative Transportation, and Constrained Resources.

Through its committee structure, CMAP has several working groups dedicated to the linking planning and the environment, including the Environment and Natural Resources Committee, the Land Use Committee, and the Wastewater Committee. These issues, particularly how they pertain to the GO TO 2040 and ON TO 2050 plans, are often discussed within other committees as well.

The Environment & Natural Resources Committee's role is to provide feedback to staff and the coordinating committees on CMAP projects as they relate to environment and natural resources, serve as a discussion forum for regionally important issues in environmental planning and policy, help coordinate and prioritize policy positions, programs, and advocacy between CMAP and other organizations, and to help identify relevant environmental best practices and encourage their adoption by CMAP partners in the region.

The CMAP staffs a Wastewater Committee responsible for recommending directly to the Illinois EPA the appropriateness of proposed requests for modifications and amendments to the established boundaries of wastewater facility planning areas, requests for expansions of wastewater treatment facilities, and other amendments to the State of Illinois Water Quality Management Plan.

Finding: The MPO satisfies the regulatory requirements for environmental mitigation.

Section 2-16: Consultation & Coordination

Regulatory Basis: The regulations for consultation are set forth primarily in 23 CFR 450.316(b-e) which calls for consultation in developing the MTP and TIP. Consultation is also addressed specifically in connection with the MTP in 23 CFR 450.324(g) and (f)(10) related to environmental mitigation.

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

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

In developing the MTP, the MPO shall consult as appropriate with State and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation. The consultation shall involve, as appropriate (1) comparison of the MTP with State conservation plans or maps, if available, or (2) comparison of the MTP with inventories of natural or historic resources, if available.

Status: The committee structure at CMAP is used to review and approve both the TIP and MTP. The committees are composed of agencies, officials, and public citizens who review and approve many of the planning products CMAP produces. The committee structure is designed around regular and consistent consultation and coordination between the agency and its partners. In developing both GO TO 2040 and ON TO 2050, CMAP has worked closely with IDOT and local partners to establish a thorough and well documented coordination and consultation process. Groups identified in Federal regulations including State, local, and non-government agencies associated with economic development, environmental protection, conservation, historic preservation, airport operations, and freight movements have all been engaged through the committee structure as well as direct and public outreach.

Finding: The MPO satisfies the regulatory requirements for consultation and coordination.

Section 2-17: Transportation Systems Management and Operations

Regulatory Basis: Federal statute 23 U.S.C. 134 (h)(1)(G), requires the metropolitan planning process to include the consideration of projects and strategies that will promote efficient system management and operation. Federal statute 23 U.S.C. 134(i)(2)(F), which provides the basis for 23 CFR 450.324(f)(5), specifies that operational and management strategies to improve the performance of existing transportation facilities to relieve vehicular congestion and maximize the safety and mobility of people and goods. 23 CFR 450.324(f)(11)(i) further requires that the financial plan for the MTP – and per 23 CFR 450.326(j), the financial plan for the TIP – must contain system-level estimates of costs and revenue sources that are reasonably expected to be available to adequately operate and maintain Federal-aid highways and public transportation.

Status: A Highway Operations strategy paper has been produced to help guide the development of ON TO 2050. The principle conclusion of this paper is that operational improvements should be the first option in considering how to improve mobility in the region. It is noted that non-recurring congestion cannot be alleviated through capacity improvements and any reductions in delay must come from management and operations and that even when insufficient capacity is the cause of congestion and delay, capacity expansion is not practical in many locations. The study provides a number recommendations under the topics of:

- Enhance Communication and Coordination to Improve Highway Operations
- Focus More Resources on Incident Management
- Consider Ways to Improve Weather Response
- Modernize and Retime Traffic Signals
- Reduce Work Zone Duration
- Implement Active Traffic Management
- Establish Regional Objectives for Highway Operations
- Prioritize Investments in Highway Operations

In addition to pursuing these kinds of strategies, the ON TO 2050 financial plan will maintain the region's priority on funding the maintenance and preservation of the system.

The CMAP continues to staff and support the RTOC and the ATTF. These entities have historically overlapped in scope and committee membership and now meet jointly. The RTOC/ATTF serves as a forum for collaboration to advance multi-modal transportation systems operations and is active in development and prioritization of regional safety and congestion performance measures.

Finding: The CMAP satisfies the regulatory requirements for transportation systems management and operations.

Transportation management and operations considerations are prevalent throughout the planning process. The MPO should more clearly articulate the roles, responsibilities, and differences between the RTOC and ATTF. As part of this discussion, the MPO should examine how emerging major technological considerations such as vehicle automation, vehicle to vehicle communication, and vehicle to infrastructure communication will be studied and addressed throughout the planning process.

Section 2-18: Transportation Safety Planning

Regulatory Basis: The FAST Act requires MPOs to consider safety as one of ten planning factors and continues the mandate for statewide Strategic Highway Safety Plans. Safety Performance Management regulations have established the national goal to achieve a significant reduction in traffic fatalities and serious injuries on all public roads. These regulations require State DOT and MPOs to set targets for five safety performance measures. These measures have been established as the five-year rolling averages of:

- Number of Fatalities
- Rate of Fatalities per 100 million Vehicle Miles Traveled
- Number of Serious Injuries
- Rate of Serious Injuries per 100 million Vehicle Miles Traveled
- Number of Non-Motorized Fatalities and Non-Motorized Serious Injuries

The regulations allow MPOs to adopt and support the State's targets, develop their own targets, or use a combination of both. States will report their targets to FHWA in an annual report while MPOs do not directly report their targets to FHWA. Rather, the State and MPO mutually agree on the manner in which the MPO reports the targets to its respective DOT. The MPOs must include baseline safety performance targets and progress toward achieving those targets in the system performance report in the Metropolitan Transportation Plan. The Safety Performance Management Final Rule also establishes the process for State Departments of Transportation and MPOs to coordinate and report their safety targets and the process that FHWA will use to assess whether State DOTs have met or made significant progress toward meeting their safety targets. The MPOs are required to set safety targets on an annual basis and to indicate how the TIP demonstrates progress towards achieving the safety performance targets.

Status: The IDOT has submitted safety targets that reduce each performance measure by 2 percent annually for 2017 and 2018 and the MPO has chosen to support IDOT's 2018 safety targets. Through this action, the MPO agrees to integrate the targets as goals in the metropolitan planning process and to plan and program projects that help meet the State's targets.

The FHWA will determine whether IDOT has met or made significant progress toward meeting safety targets and will not directly assess MPO progress towards meeting targets. However, FHWA will review the MPO's performance as part of subsequent TMA Certification Reviews and through the Federal Planning Finding associated with the approval of the STIP.

This formal performance management framework builds upon significant ongoing work in the region to develop and utilize safety metrics. Key themes throughout the region's safety work include traditional topics such as driver behavior, enforcement, engineering, and the quality and availability of data. Additionally, emphasis is being placed on studying how emerging vehicle and infrastructure technology will improve both survivability as well as crash avoidance. Furthermore, the MPO continues to place focus on vulnerable users such as bicyclists and pedestrians whose crashes also disproportionately affect minority and low-income individuals.

Finding: The CMAP satisfies the regulatory requirements for transportation safety planning.

The Review Team commends the region for ensuring that the safety of transportation system users is a top priority for transportation agencies in the region. Many of these partners are advancing prominent safety programs such as the City of Chicago's Vision Zero initiative. The MPO advances a data-driven approach to identify problems, proactively seek solutions, and evaluate the results. Regional programming processes administered through CMAP and many of the Councils of Mayors also utilize safety data to help prioritize and select projects. The IDOT and the MPO have adopted initial safety targets through a collaborative process and will continue to work closely to evaluate the effectiveness of strategies.

Section 2-19: Security in the Planning Process

Regulatory Basis: Federal legislation has separated security as a stand-alone element of the planning process (both metropolitan 23 CFR 450.306(b)(3) and Statewide 23 CFR 450.206(a)(3) planning). The regulations also state that the degree and consideration of security should be based on the scale and complexity of many different local issues.

Status: The CMAP works with a variety of partners who have responsibilities for preparation for and resilience to natural, manmade, or technological disasters, hazards, or acts of terrorism.

Finding: The CMAP satisfies the regulatory requirements for security in the planning process.

The State of Illinois and the City of Chicago lead extensive emergency preparedness operations and there is no expectation that the MPO administer another parallel security planning effort. The CMAP and local governments can support security planning efforts through monitoring the transportation system to guard against critical infrastructure failures and to prepare for situations where the transportation network could fail due to volume surges and overcapacity usage. Additionally, CMAP remains well positioned to serve as an informational forum and to offer technical assistance on congestion management, systems operations, and intelligent transportation systems.

Section 2-20: Integrating Freight in the Transportation Planning Process

Regulatory Basis: The FAST Act includes several provisions to improve the condition and performance of the national freight network such as the establishment of a National Multimodal Freight Network, a National Freight Strategic Plan, State freight advisory committees, and State freight plans. The FAST Act highlights investment in freight-related surface transportation projects and emphasizes the need to address freight movement as part of the statewide and metropolitan transportation planning processes. 23 U.S.C. 134(a) indicates that it is in the national interest to encourage and promote the safe and efficient management, operation, and development of surface transportation systems that will serve the mobility needs of people and freight and foster economic growth and development within and between States and urbanized

areas, while minimizing transportation related fuel consumption and air pollution. Three of the ten planning factors include freight related provisions and consultation regulations include freight transportation services as interested parties.

Status: The State of Illinois has submitted a State Freight Plan that has been found to meet the regulations of 49 U.S.C. 70202 and 23 U.S.C. 167(i)(4) for Fiscal Years 2016 and 2017. For full compliance, the State Freight Plan will add a fiscally constrained Freight Investment Plan which IDOT has indicated will be developed through a statewide competitive grant program that seeks to:

- Support objectivity, equity, and transparency in project selection
- Reinforce the use of freight performance goals
- Provide opportunity for local or private participation to leverage funds
- Provide the opportunity for the Illinois State Freight Advisory Council to provide input into the development and delivery of the program

The IDOT has established the Illinois State Freight Advisory Council to provide a standing forum for coordination of multimodal freight planning with a stated goal to improve connections and sustain the State's position as the primary freight hub of the United States. The CMAP also administers a Freight Committee to identify, assess, and respond to goods movement travel issues and opportunities and to provide overall guidance for the development of the regional goods movement components of GO TO 2040/ON TO 2050. Membership includes representatives from freight industry organizations, private railroads, trucking companies, consultants, researchers, planners as well as representatives of local, regional, and State governments.

The CMAP developed a Regional Strategic Freight Direction report that is intended to guide its role in relation to freight transportation development over the near term. The report was adopted by the MPO Policy Committee in January 2018

The MPO designated 89.61 miles as Critical Urban Freight Corridors to be part of the National Highway Freight Network which established eligibility for apportioned and discretionary freight funding programs under the FAST Act. The designations were identified as flexible and could be changed as need to reflect changes in funding priorities.

The planning process continues to support the CREATE program. The CREATE is a public-private partnership between freight railroads, U.S. DOT, IDOT, the City of Chicago, Metra, and Amtrak. The program consists of 70 projects spanning a range of rail infrastructure improvements in addition to highway-rail grade separation projects and a viaduct improvement program.

Cook and Will Counties have both engaged in significant freight planning activities and produced countywide freight plans that prioritize freight related policy, funding, and project recommendations. These plans are intended to build on other freight planning work being accomplished in the region to support the region's competitiveness in manufacturing, goods, movement, and logistics.

The region hosted the FHWA Administrator's Beyond Traffic Roundtable on the Freight Economy in 2016 to help inform the draft National Freight Strategic Plan. The event had several private sector attendees representing many segments of the freight industry as well as participation by Administrators for the FHWA, Federal Motor Carrier Safety Administration, and St. Lawrence Seaway in addition to the Illinois Secretary of Transportation and the CMAP Executive Director. Additionally, in 2017, the region hosted a two-day FHWA workshop titled "Planning and Addressing Freight at the Megaregion Level." The workshop brought together

public and private sector decision makers to discuss how they can better connect and work together to address multimodal freight transportation on a megaregion scale in the Midwest.

Finding: The CMAP satisfies the regulatory requirements for integrating freight in the transportation planning process.

There are a number of freight related planning and development efforts advancing at the statewide, regional, and local levels. Many of these such as the Cook County Freight Plan and the Will County Community Friendly Freight Mobility Plan are valuable efforts but advancing largely independent of other freight development initiatives. The Regional Freight Strategic Direction report is an attempt to help unify policy direction and organize future work and the State Freight Plan likewise provides overarching guidance designed to coordinate and maximize efforts. But in the Chicago metropolitan region with so many freight needs and public and private stakeholders, attempts to provide comprehensive freight planning have largely resulted in an inability to prioritize strategies or investments.

It is recommended that IDOT and CMAP more closely coordinate freight planning and development programs to better ensure goals and strategies are focused and aligned. Initial steps could include cross-representation on the ISFAC and CMAP Freight Committees in addition to coordinating efforts on data collection and performance reporting. Without more focused efforts, the region will likely continue to be challenged by existing needs and emerging freight demands such as automated trucks, drone deliveries, and continued rapid industrial and logistics development in Will County.

An example of the effectiveness of close coordination between the State and CMAP is demonstrated by the successful establishment of CUFCs. With only 168.54 miles of allotted Statewide mileage, both agencies are commended for reaching an agreement on mileage in metropolitan Chicago with an understanding on when and why modifications may be pursued.

Part 3: Certification Review Site Visit Participant List

Erin Aleman, IDOT
Victor Austin, FTA
Jennifer Becker, Kane County
Cindy Cambray, CMAP
Brian Carlson, IDOT
Jay Ciavarella, FTA
Michael Connelly, CTA
Corbin Davis, FHWA
Teri Dixon, CMAP
Kama Dobbs, CMAP
John Donovan, FHWA
Jesse Elam, CMAP
Doug Ferguson, CMAP
Tom Garritano, CMAP
Vontra Giles, FHWA
Anthony Greep, FTA
Jane Grover, CMAP
Katanya Harris, CMAP
Tom Kelso, IDOT
Tom Kotarac, CMAP
Michael Kowalczyk, FHWA
Jon-Paul Kohler, FHWA

David Kralik, Metra
Janet Kuhn, Pace
Angela Hardimon, CMAP
Kelwin Harris, CMAP
Lindsay Hollander, CMAP
Martin Menninger, CMAP
Thomas Murtha, CMAP
Lorri Newson, RTA
Holly Ostdick, IDOT
Sylvia Peistrup, Pace
Russell Pietrowiak, CMAP
Melissa Porter, CMAP
Chad Riddle, IDOT
Liz Schuh, CMAP
Todd Schmidt, CMAP
Gordon Smith, CMAP
Joe Szabo, CMAP
Melvin Thompson, Endeleo Institute
Betsy Tracy, FHWA
Michael Vanderhoof, IDOT
Michael Weisner, Commuter Cars Corporation

Part 4: Certification Review Site Visit Meeting Agenda

TUESDAY, DECEMBER 5TH

1:00 – 3:00 Introductions and Overview

Organization and Administration of the Planning Process

Organizational Structure

Roles & Responsibilities

Partner Coordination

Agreements and Contracts

Self-Certification

3:00-5:00 Public Meeting at CMAP Office

WEDNESDAY, DECEMBER 6TH

8:30 – 10:00 Concurrent Session: Program Development

UPWP including agency funding

TIP development changes and eTIP System

FTA 5307 sub-allocation process

STP program changes

CMAQ program

8:30 – 10:00 Concurrent Session: Freight Program Assessment

10:15 – 12:00 Performance-Based Planning and Programming

Highway Safety Performance Measure Target Setting

Transit Asset Management Plan

Annual Transit Target Setting Provisions

12:00 – 1:00 Lunch

1:00 – 2:00 Public Participation

PPP Review

Environmental Justice

Civil Rights

2:15 – 4:00 ON TO 2050 Review

Status and Timeline

Fiscal Constraint

Major Capital Projects

THURSDAY, DECEMBER 7TH

9:00 – 10:00 Federal Team Meeting

10:00 – 11:00 Preliminary Findings Discussion with CMAP

TUESDAY, DECEMBER 12th

3:30 – 5:30 Presentation to Citizens Advisory Committee

APPENDICES

List of resources with website links (if available) used in the certification review:

- A. Responses to the Advanced Review Questionnaire
- B. [Metropolitan Transportation Plan \(GO TO 2040\)](#)
- C. [Metropolitan Transportation Plan \(ON TO 2050\)](#)
- D. [Transportation Improvement Program](#)
- E. [eTIP Public Site](#)
- F. [Unified Work Program](#)
- G. [Memorandum of Understanding between the MPO Policy Committee and CMAP Board \(2017\)](#)
- H. [CMAP Council of Mayors](#)
- I. [MOA Between the City of Chicago and the CMAP Council of Mayors Regarding the Distribution and Active Program Management of Locally Programmed Surface Transportation Block Grant Funds](#)
- J. [Program Development for Congestion Mitigation and Air Quality Improvement Program \(FY 2018-2022\) and Transportation Alternatives Program \(FY 2018-2020\)](#)
- K. [Participation Plan](#)
- L. [MPO Self-Certification \(2017\)](#)
- M. [FY 2015 Regional Project Award and Obligation Report for Northeastern Illinois](#)
- N. [Congestion Management Process](#)