On January 8, 2014, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA), in a letter approving the 2014-2017 Washington State Transportation Improvement Program (STIP), found that the 2014-2017 STIP is based on a transportation planning process that substantially meets the requirements of 23 U.S.C. Sections 134 and 135, 49 U.S.C. Sections 5303-5304, and 23 CFR 450 Subparts A, B, and C. This Memorandum documents that planning finding for Washington State’s 2014-2017 STIP and all of the incorporated Transportation Improvement Plans (TIPs) for the metropolitan areas of the State.

The planning finding is based on the results of a year-long comprehensive review that focused closely on the statewide and metropolitan transportation planning processes in Washington State. The FHWA and FTA planning review focused on the following activities:

1. The Washington State Department of Transportation (WSDOT) self-certification and the Metropolitan Planning Organization (MPO)/WSDOT self-certifications, which include compliance with:

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 SAFETEA–LU (Pub. L. 109–59) and 49 CFR part 26 regarding the involvement of disadvantaged business enterprises in USDOT funded projects;

23 CFR part 230, regarding 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;

In states containing 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;

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 U.S.C., regarding the prohibition of discrimination based on gender; and

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

2. Routine FHWA/FTA involvement in the statewide and metropolitan planning processes via attendance at the following meetings:

- Participation in MPO/Regional Transportation Planning Organization (RTPO) coordination meetings,
- Attendance at statewide and MPO planning meetings,
- Participation in MPO subcommittee meetings.

3. Formal process-oriented reviews including:

- Statewide Planning and Research (SPR) review,
- Highway Performance Monitoring System (HPMS) review,
- Truck Size and Weight Program review,
- Unified Planning Work Program (UPWP) reviews,
- Air Quality Conformity review – Air quality conformity determinations for 2014 TIPs for PSRC, SWRTC, SRTC, TRPC and YVCOG were reviewed and concurred with by Washington State Department of Transportation (WSDOT), Washington State Department of Ecology (Ecology), U.S. Environment Protection Agency (EPA), FHWA, and FTA in a meeting held October 29, 2013 and found to conform with the State Implementation Plan to reduce the severity and number of NAAQS violations, insuring expeditious attainment of standards.

4. In-depth reviews of selected areas:

- Federal certifications for the Transportation Management Areas (TMA) in Washington State were current through 2013; consequently, no formal reviews were conducted.
Management at Benton Franklin Council of Governments (BFCG), the lead agency for the Kennewick-Pasco urbanized area designated as a TMA during 2013, requested assistance to review the agency’s planning program under the new TMA requirements. As a result, an informal review, facilitated by FHWA Headquarters, was conducted by WSDOT, FTA, and FHWA.

5. Interagency coordination:
   - FHWA and FTA evaluated the level of coordination within the transportation planning process, including coordination between the Statewide and the metropolitan transportation planning processes.
   - FHWA and FTA evaluated the overall coordination within the state planning process for transit service provisions among transit operators and human service providers,
   - FHWA and FTA evaluated the coordination necessary to consider the concerns of local elected officials in non-metropolitan areas, Tribal governments, and Federal land management agencies.

6. Involvement of interested parties:
   - FHWA and FTA evaluated the extent to which the statewide and metropolitan planning processes, based on adopted processes, carry out a public involvement effort to the general public, and how well these processes work through the MPO and State periodic evaluations.

7. Review of current Metropolitan Transportation Plans (MTPs):
   - Benton Franklin COG MTP valid until May 18, 2017
   - Cowlitz-Wahkiakum COG MTP valid until November 19, 2014
   - Lewis - Clark Valley MPO MTP valid until November 15, 2018
   - Puget Sound Regional Council MTP valid until June 16, 2014
   - Skagit MPO MTP valid until April 27, 2016
   - Southwest Washington RTC MTP valid until January 12, 2016
   - Spokane RTC MTP valid until January 16, 2016
   - Thurston Regional Planning Council MTP valid until June 28, 2015
   - Wenatchee Valley Transportation Council MTP valid until September 9, 2015
   - Whatcom COG MTP valid until June 27, 2017
   - Yakima Valley COG MTP valid until March 30, 2016

- Review of Metropolitan TIPs
  - In a memorandum signed November 25, 2013, the Secretary of the Washington State Department of Transportation, as delegated by the Governor, approved the MPO TIPs submitted for the calendar years 2014-2017 for inclusion in the 2014-2017 STIP. This approval concluded that the Metropolitan TIPs substantially meet the requirements stated in Title 23 United States Code, Section 134 and Title 49 United States Code, Section 53 and that the projects in these TIPs using federal, state, and local funds are financially constrained.

- The approved 2014-2017 Metropolitan TIPs are from the following MPOs:
  - Benton-Franklin Council of Governments
SIGNIFICANT FINDINGS

Statewide Planning and Research Program (SPR)

SPR Review
FHWA and FTA completed a biennial review of the WSDOT Statewide Planning and Research (SPR) Program, and findings were shared with WSDOT in a letter dated June 30, 2013. The SPR Program was found to substantially meet the requirements of 23 CFR 420.111, and approved through the end of SFY 2015 subject to two specific requirements:

1. Completion of a “Long Form” Self-Certification of the Statewide Planning program in order to document compliance with Federal requirements prior to the end of Federal Fiscal Year 2014. The form and content of the Self-Certification is to be developed cooperatively with FHWA and FTA, but should be consistent with the format developed for the MPOs in Washington State.

2. WSDOT implementing a comprehensive SPR program development and review process that, at a minimum, meets the requirements of the Stewardship and Oversight agreement between WSDOT and FHWA.

Planning (PL) Funding
Recognizing the impacts of the passage of MAP-21 and the designation of one new MPO and one new TMA in Washington State, WSDOT completed a review and updated the distribution formula for PL funds in consultation with the MPOs, FHWA, and FTA.

Performance and Expenditure Reports
WSDOT provides periodic reports on both performance and expenditures of sub-recipients of Federal planning and research funds as required.

Lobbying
In cooperation with FHWA and FTA, WSDOT initiated coordination with the MPOs to address procedures and reporting for contacts with elected and administration officials related specifically to transportation issues.

Coordination

MPOs
WSDOT planning activities of national significance, as required by 23 CFR Part 450.208, have been addressed adequately. WSDOT has developed and supported, as a part of its
MPO/RTPO management program, extensive interagency coordination with the MPOs to ensure ongoing communication of key planning issues and policies as is demonstrated by the quarterly MPO/RTPO/WSDOT Coordinating Committee meeting.

**Federal Land Management Agencies (FLMAs)**
Coordination with FLMAs to provide cooperation in the development of transportation plans remains problematic due to federal constraints despite continued efforts by WSDOT and MPOs to solicit and engage FMLA agencies in their planning processes. In December 2013, Western Federal Lands Highway Division convened a committee to develop a Collaborative Long Range Transportation Plan for FLMAs in Washington and Oregon. WSDOT is a committee member and intends to use this committee as a forum for consultation and information sharing. WSDOT also intends to facilitate conversations about the long range plan update between the FLMAs and Tribes, Washington Indian Transportation Policy Committee (WITPAC), Metropolitan Planning Organizations, Regional Transportation Planning Organizations, County Road Administration Board, Freight Mobility Strategic Investment Board, Washington State Transit Association, and other transportation partners.

**Tribal Governments**
WSDOT continues to sustain extensive coordination with tribal interests in building relationships and tribal transportation planning capacity as is evidenced by the Tribal Transportation Planning Organization (TTPO) that was organized and supported by WSDOT. In addition, WSDOT presented several conference panel sessions and training workshops in conjunction with Tribal events.

**Data collection and Analysis**
WSDOT collects and reports data that support FHWA’s responsibilities to Congress and to the public. These data have consistently exceeded requirements and indicate that WSDOT operates and maintains a technically proficient and robust transportation data management system. Data collection includes Highway Performance Monitoring System information, Urban Area Boundary and Functional Classification information, and other data related to Highway Statistics reports published annually by FHWA.

Separately, the Vehicle Size and Weight program, which monitors the flow of truck traffic and goods, and assures that this sector of the transportation environment is tracked according to law, is co-managed by WSDOT and the Washington State Patrol. FHWA WA Division staff worked closely with these groups in 2013 to assure that the Size and Weight program meets the required regulatory criteria, and that the trends within the program indicate a continued diligence for safety and reducing size and weight violations. FHWA WA Division staff will be working with the program team in the other agencies during a March 2014 National Review of this program, which will also serve as the Division’s triennial review.

**Public Involvement**

**Statewide**
Previous updates of the Statewide Long Range Transportation Plan and STIP included comprehensive public outreach at regional and local levels but were accomplished
without a documented statewide public involvement process. WSDOT is currently
developing a comprehensive statewide public involvement plan that includes substantial
comments from FTA and FHWA.

**STIP**
WSDOT has developed Public Involvement Plan for the STIP that satisfies Federal
requirements for public involvement pending the completion of the statewide public
involvement plan. WSDOT has followed the identified procedures in the interim for
public review and comment on the 2014-2017 STIP.

**Transportation Studies and Project Development**
During 2013, WSDOT reviewed and is making revisions to procedures to identify, prioritize and
implement Corridor Studies from a statewide perspective. In 2013, MPOs/RTPOs were asked to
support and endorse proposed studies.

**Statewide Long Range Transportation Plan**
The Washington Transportation Plan (WTP) update has been initiated and coordination is
ongoing with stakeholders. WSDOT, in cooperation with the Washington State Transportation
Commission, provided direction and resources to ensure development of a scope for the federally
compliant statewide transportation policy plan due December 2014.

**Statewide Transportation Improvement Program (STIP)**
During the 2013 program year, WSDOT processed the original 2013-2016 STIP and ten (10)
amendments to the 2013-2016 STIP. The STIP consisted of about 1,000 projects that
programmed approximately $2 billion in federal funds.

WSDOT uses a web-based STIP software program that allows local agencies to input their
projects online once, for both the 6-year TIP and the STIP. Local agencies then submit their
projects electronically to their respective Metropolitan Planning Organization (MPO) or
Regional Transportation Planning Organization (RTPO). WSDOT has provided extensive
training in the use of the new STIP program to all users, including MPOs, RTPOs, cities,
counties, Tribes, transit organizations, WSDOT regional staff, and FHWA Washington Division
staff. The training addresses developing projects to include in TIPs, the application of federal
law and regulations regarding the STIP, and the use of the new STIP program.

WSDOT continues to coordinate with MPOs and federal partners resolving issues on a case-by-
case basis as they are identified, which include statewide programs, funding category eligibility,
submittal procedures, amendment criteria, update and amendment timeframe, and fiscal
constraint demonstration.

**Fiscal Constraint**
Fiscal constraint has been adequately addressed in the TIP/STIP development process. WSDOT
has defined “reasonably available funds” and has provided examples to allow clear
understanding of federal and state requirements for project planning and programming.

**Self-Certification**
WSDOT has implemented and managed its long-form Self-Certification process to aid MPOs in documenting compliance to Federal requirements.

**Metropolitan Planning and Implementation of the 2010 Census**

**Adjusted Urban Area (AUA) Boundaries and Functional Classification**
The Statewide Transportation Planning Office successfully led the multi-agency process to coordinate with local officials in Urbanized Areas (UZA) and small urban areas desiring to expand their boundaries. The authority to adjust the US Census designated Urban Area (UA) boundary is provided in 23 CFR 470.105. The UA boundary adjustments were cooperatively negotiated by MPOs and RTPOs, local officials, and WSDOT before being submitted to FHWA for approval. The functional classification of highways also occurred in 2013 and is near completion.

**MPO Designation**
During 2013, WSDOT provided exemplary leadership assisting in the designation of the Walla Walla Valley MPO. As the result of WSDOT’s extensive encouragement and consultation, the Metropolitan Planning Area Boundary was identified, draft inter-local agreements and Bylaws were adopted, and designation by the Governors of Washington and Oregon was completed prior to the date required by Federal law.

**TMA Designation**
The 2010 Census resulted in designation of the Pasco, Kennewick, and Richland urban area as a Transportation Management Area (TMA) with a population over 200,000. WSDOT supported the Benton-Franklin Council of Governments (BFCG), the lead agency in the transition and the identification of additional TMA requirements to be addressed. WSDOT worked with FTA and FHWA to conduct training for this new TMA, including topics such as the Congestion Management Process and Fiscal Constraint.

WSDOT, FHWA, and FTA staff worked extensively with BFCG throughout 2013 to provide support, guidance, and advice requested by the MPO to accomplish the requirements of a TMA. The team created a summer workshop in June 2013 to work with BFCOG and area Transit staff, and followed up with monthly meetings and phone calls to clarify new requirements and complete their first major deliverable, a Congestion Management Plan in January 2014.

**Metropolitan Planning Agreements**
WSDOT initiated, coordinated and managed a review and update of the Memoranda of Agreement (MOA) required among MPOs, the State and transit providers. Beginning with SRTC, the initial development and inclusion of all necessary elements of the pilot MOA have been completed and subsequent updates for each MPO are planned.

**Fiduciary Responsibilities of WSDOT**
MPO/RTPO fiduciary “Money Agreements” were revised to reflect changes in FTA Circular in collaboration with the MPOs/RTPOs. This agreement ties the UPWP and UPWP Guidance tighter to the reimbursement process requirements.

**Annual List of Obligated Projects**
WSDOT has provided quarterly reports to all MPOs, RTPOs, and county lead agencies of all obligations. The last quarter of the year reports will be provided in January 2014 to ensure that MPO annual reports will be completed within 90 days after the calendar year ends. As part of the STIP, links are provided to each of the MPO web sites to access this information.

**Unified Planning Work Planning (UPWP) Guidance and MPO Self-Certification**
UPWP Guidance was developed by WSDOT in consultation with FHWA, FTA, MPOs, and RTPOs. The guidance ensures that planning activities are closely tied to federal and state planning funds. WSDOT also developed individual self-certification long form documents specific to each MPO. WSDOT worked with MPOs to identify areas where additional documents and planning activities were needed to be in compliance with CFR. WSDOT will continue to work with MPOs in 2014 to ensure these areas of improvement are completed.

**MPO Annual Reports**
WSDOT has begun a new approach for the review of MPO Annual Reports. WSDOT will work with individual MPOs to provide training on Annual Report requirements in calendar year 2014.