



U.S. Department of Transportation
Federal Transit Administration
Region V
200 West Adams, Suite 320
Chicago, IL 60606



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

March 7, 2023

Mr. Omer Osman
MPO Policy Committee Chairman
Chicago Metropolitan Agency for Planning
433 West Van Buren Street, Suite 450
Chicago, Illinois 60607

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

Dear Mr. Osman:

As noted in our May 31, 2022 letter, 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, Illinois Transportation Management Area. At that time, we issued a finding of full certification for the transportation planning process for this region. We are now enclosing a report that documents the results of the review and offers several recommendations for continuing quality improvements and enhancements to the planning process.

We appreciate the cooperation of the Metropolitan Planning Organization (MPO) staff in assisting us with the review. If you have any questions regarding this certification action, please contact John Donovan, FHWA, at (312) 353-4048 or Tony Greep, FTA, at (312) 353-1646.

Sincerely,

Jay Ciavarella
Director, Office of Planning
And Program Development
Federal Transit Administration

Jon-Paul Kohler
Planning and Program
Development Manager
Federal Highway Administration

Enclosure

Chicago, Illinois TMA Certification Review

2022

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 Register. 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.



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Part 1: Executive Summary

Review Summary

On March 8-10, 2022, the Federal Highway Administration (FHWA) Illinois Division and the Federal Transit Administration (FTA) Region 5 Office conducted a certification review of the transportation planning process for the Chicago, Illinois Transportation Management Area (TMA). FHWA and FTA are required to jointly review and evaluate the transportation planning process for each urbanized area over 200,000 in population at least once every four years to determine if the process meets Federal planning requirements. The Federal planning requirements are defined in Chapter 134 of Title 23 of the United States Code (USC) and Part 450 of Title 23 of the Code of Federal Regulations (CFR).

This document describes the review and findings of the TMA's planning process 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.

On November 15th, 2021, the Infrastructure Investment and Jobs Act (IIJA), also known as the Bipartisan Infrastructure Law (BIL), was signed into law. While the law contains changes that will impact the planning process MPOs follow, at the time of this review limited guidance has been issued for the implementing agencies.

The 2022 certification review used a risk-based approach to identify focus areas. Based on the review's outcome, FHWA and FTA could issue one of three actions for each focus area: a commendation, recommendation, or corrective action.

Key definitions used throughout this report are defined below:

Current Status and Findings: Statements of fact, interpretations and conclusions regarding the conditions found during the review. These statements provide the primary basis for determining the Federal actions (commendations, recommendations, or corrective actions), if any, contained in the report.

- **Commendations:** Best practices that demonstrate innovative, highly effective, well-thought-out procedures for implementing the planning requirements. Procedures addressing issues that have frequently posed problems nationwide could be cited as noteworthy practices. Commendations may also be cited for significant improvements and/or resolution of past findings.
- **Recommendation:** Procedures that could improve regulatory compliance and/or represent best planning practices. While recommendations are somewhat less substantial than a corrective action, they are significant. FHWA and FTA encourage the relevant planning partners to implement them accordingly.
- **Corrective Action:** Practices that fail to meet requirements identified in the transportation statutes and regulations that seriously impact the outcome of the overall process. The report clearly defines the expected changes and timelines for resolution.

Background

Under 23 USC 134(k) and 49 USC 5303(k), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMAs) at least once every four years.

A TMA is an urbanized area, as defined by the U.S. Census Bureau, with a population over 200,000 persons. After the 2010 Census, the Secretary of Transportation designated 183 TMAs in the United States. These 183 TMAs included 179 urbanized areas over 200,000 in population and four urbanized areas that received special designation.

In general, a TMA certification review consists of three primary activities:

1. A review of planning products before and during the on-site visit.
2. An on-site visit.
3. Preparation of a report that summarizes the review and identifies findings.

Certification reviews focus on compliance with Federal regulations. The reviews also look at the challenges, successes, and experiences of the cooperative relationship between the MPO(s), the State DOT(s), and public transportation operator(s) in conducting the metropolitan transportation planning process. Joint FHWA and FTA certification review guidelines allow agency staff to tailor the review to reflect regional issues and needs. For this reason, the scope and depth of certification review reports vary significantly by local circumstances.

The certification review process is only one of several methods used to assess the quality of the regional metropolitan transportation planning process, compliance with applicable laws and regulations, and the level and type of technical assistance needed to enhance the effectiveness of the planning process. Other activities also provide opportunities for this type of review and comment, such as Unified Planning Work Program (UPWP) approval, the Metropolitan Transportation Plan (MTP), and metropolitan and statewide Transportation Improvement Program (TIP) findings. Other formal and less formal contact also provide FHWA and FTA an opportunity to comment on the planning process. The results of these other opportunities are also considered in the certification review process. The certification review report documents the results of the review process. The report and final actions are the joint responsibility of the appropriate FHWA and FTA field offices.

Description and Overview of Region and MPO

Transportation is a critical component of Northeastern Illinois' 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 redevelop 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. 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-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 with over

7,200 route miles. The region is the nation's busiest freight hub seeing one-fourth of all U.S. rail freight each day. Two international airports primarily serve the region's air passengers and cargo needs.

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, seven counties (Cook, DuPage, Kane, Kendall, Lake, McHenry, and Will) and 77 Chicago neighborhoods. The region's current comprehensive plan is ON TO 2050, which replaced GO TO 2040 in October, 2018 and is slated to be updated in 2022. ON TO 2050 builds upon its predecessor by continuing to establish coordinated strategies that help the region's 284 communities address community, prosperity, environment governance and mobility issues.

The MPO Policy Committee is chaired by Omer Osman, Secretary of the IDOT and the CMAP Board is chaired by Gerald Bennett, Mayor of Palos Hills. CMAP staff are led by Executive Director Erin Aleman. 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.

Like all large urban areas throughout the country, the planning process in the Chicago TMA has had to navigate the unprecedented challenges presented by the COVID-19 global pandemic. The planning partners have been working to understand the new transportation and planning needs of the region while adjusting to constantly changing and developing scenarios presented by the virus.

While the future remains uncertain, funding at the State and Federal levels has provided some stability for the first time in many years. With the passage of the Rebuild Illinois Capital Plan in June 2019, the state of Illinois committed \$33.2 billion to transportation, providing the first comprehensive multi-year capital plan in a decade. In addition, on November 15th, 2021, the Infrastructure Investment and Jobs Act (IIJA), also known as the Bipartisan Infrastructure Law (BIL), was signed into law, providing the largest Federal investment in public transit ever, as well as the single largest dedicated bridge investment since the construction of the interstate highway system.

With more funding, particularly increases in competitive funding programs, the region will need to remain unified and coordinate efforts now more than ever. The challenges the region faces on safety, transit ridership and population shifts, and climate change will test the cooperation and coordination of the stakeholders and demand even more from CMAP and the planning process. Many challenges remain ahead for the region, but a solid planning foundation should help them navigate through.

Previous Findings

The 2022 Certification Review is the eighth US DOT review of the transportation planning process in the Chicago, Illinois TMA. Previous reviews were conducted in 2018, 2014, 2010, 2005, 2002, 1999, and 1996. The 2018 Review issued a total of sixteen formal recommendations, ten commendations, and seven observations, documented below and in Appendix A. CMAP, IDOT, and other members of the MPO have demonstrated a strong commitment to continue to improve their planning processes and programs. All 2018 recommendations have been considered in the interim years and most all topics have been resolved or substantial progress has been made. This current review has considered these previous recommendations and incorporated them as appropriate into the 2022 findings.

Summary of Previous Findings

Table 1: 2018 Certification Review Findings and Status

2018 Review Area	2018 Findings	Code (R, C, O)	2022 Status Update
Organization Structure of Study Area	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.	R	While little progress has been made, the issue has not remained as high profile as it was at the time of the 2018 review. CMAP will be undergoing a website refresh which would present an opportunity to further address this issue.
Organization Structure of Study Area	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.	R	The fee structure has been implemented and is well established. State planning funding has seen improvements since the previous review.
Organization Structure of Study Area	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.	R	The Planning Liaison program continues to provide a critical link between regional transportation planning and local governments. CMAP administration and oversight is appropriate and work programs should continue to clearly articulate expectations.
Metropolitan Area Planning Boundaries (2-2)	As Census 2020 approaches, it is recommended CMAP should consider the impacts of a likely expansion of the Census-defined UZA.	R	CMAP has considered several scenarios throughout the planning process to accommodate a range of possible Census related changes.
Metropolitan Area Planning Boundaries (2-2)	IDOT is commended for its meticulous approach to leading a systematic review and update of countywide functional classification maps.	C	N/A
Metropolitan Area Planning Boundaries (2-2)	Observation: CMAP and the Illinois Congressional delegation demonstrated national leadership in consideration of MPO Coordination legislation.	O	N/A
Agreements and Contracts (2-3)	It is recommended CMAP further engages in the Transportation Asset Management (TAM) plan process the transit agencies are currently undergoing and works to develop a strong target development process.	R	CMAP has been actively engaged in discussions related to the TAM plan developments and implementation. The data-sharing and target development agreement was completed.

2018 Review Area	2018 Findings	Code (R, C, O)	2022 Status Update
Agreements and Contracts (2-3)	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.	R	CMAP and the Wisconsin DOT signed an updated agreement on June 18, 2018.
Unified Planning Work Program (2-4)	Observation: The Unified Work Program (UWP) 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.	O	The UWP Committee's evaluation and allocation process were reviewed and revised by the committee in 2021/2022.
Metropolitan Transportation Plan (2-6)	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.	C	N/A
Financial Planning (2-7)	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.	R	While discussions have been held and improvements made, the documentation of regional resources in the TIP is still not well defined and largely speculative. The Review Team encourages additional work between CMAP and IDOT to better document assumptions for available resources.
Financial Planning (2-7)	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.	O	The funding landscape has changed dramatically from the previous review, but the CMAP staff have worked closely with FHWA/FTA, IDOT, and other stakeholders to consider revenue sources for the ON TO 2050 Update.
Air Quality and Transportation Conformity (2-8)	Observation: Project specific special conformity amendments sought outside the established semi-annual process may introduce unnecessary procedural challenges to high profile projects.	O	Through improved management of and coordination through the Tier II consultation committee, these challenges have been significantly reduced.
Transportation Improvement Program Development and Project Selection (2-9)	The Review Team commends CMAP and the region's implementing agencies on the successful transition to eTIP.	C	N/A

2018 Review Area	2018 Findings	Code (R, C, O)	2022 Status Update
Transportation Improvement Program Development and Project Selection (2-9)	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.	O	CMAP has continued to update the eTIP features and has made several important improvements since the last review.
Transportation Improvement Program Development and Project Selection (2-9)	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.	C	N/A
Transportation Improvement Program Development and Project Selection (2-9)	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 TDCs for disadvantaged communities. It is unlikely the reform process could succeed without these commitments.	C	N/A
Transportation Improvement Program Development and Project Selection (2-9)	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.	R (2)	While discussions have been held and improvements made, the documentation of regional resources in the TIP is still not well defined and largely speculative. The Review Team encourages additional work between CMAP and IDOT to better document assumptions for available resources.
Transportation Improvement Program Development and Project Selection (2-9)	The Review Team commends the region's CMAQ and TAP programs as they continue to be effective models of performance based programming.	C	N/A
Transportation Improvement Program Development and Project Selection (2-9)	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.	R	CMAP continues to evaluate, evolve, and improve CMAQ selection criteria and program management practices. CMAP also completed the required CMAQ Mid Period Performance Report that includes traffic congestion and mobile source emissions measures.

2018 Review Area	2018 Findings	Code (R, C, O)	2022 Status Update
Transportation Improvement Program Development and Project Selection (2-9)	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.	R (2)	The RTA and transit service boards in the region have made improvements on how the sub-allocation is conducted and, beginning in 2025 will use performance measures in an open and transparent process. CMAP, through development and refinement of the regionally significant projects as part of the long-range plan and engagement with the transit operators on their respective TAM plans, has improved its early engagement.
Public Outreach and Participation (2-10)	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.	C	N/A
Title VI and Nondiscrimination (2-12)	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.	C	The priorities of ON TO 2050 have been continued in the ON TO 2050 Update.
Congestion Management Process (2-13)	The Review Team recommends 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.	R	CMP Update has been included as part of FY 2023 Work Plan and the recommendation is continued as part of 2022 Review.
List of Obligated Projects (2-14)	Observation: 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	O	eTIP continues to access the FHWA FMIS database to provide exceptional and timely access to project level information for highway projects.
List of Obligated Projects (2-14)	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.	O, R	Recommendation is continued as part of 2022 Review.

2018 Review Area	2018 Findings	Code (R, C, O)	2022 Status Update
Transportation Systems Management and Operations (2-17)	It is recommended 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.	R	The RTOC and ATTF have been merged into the Transportation Technology and Operations Coalition. The recommendation to further examine technological advances in transportation continued in the 2022 Review.
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.	C	N/A
Integrating Freight in the Transportation Planning Process (2-20)	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 IFSAC and CMAP Freight Committees in addition to coordinated efforts on data collection and performance reporting.	R	The 2022 Review recommends CMAP engagement with partner agencies in developing proposals for the Illinois Competitive Freight Program. An emphasis on project readiness is suggested.
Integrating Freight in the Transportation Planning Process (2-20)	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	C	N/A

Certification Status

The 2022 Certification Review has determined that the metropolitan transportation planning process conducted in the Chicago, Illinois TMA meets the Federal planning requirements in 23 USC 134 and 49 USC 5303. As a result of this review, FHWA and FTA are certifying the transportation planning process conducted by the Illinois Department of Transportation (IDOT), the MPO Policy Committee (MPO), the CMAP Board and staff, and the public transportation operators in the region represented by the Federal designated recipient, the Regional Transportation Authority (RTA).

While this report does not contain corrective actions, it does have several recommendations that warrant close attention and follow-up. The report also identifies areas in which the MPO is performing very well and is to be commended. Table 2 summarizes the 2022 certification review topics areas, findings and actions.

Table 2: 2022 Certification Review Areas, Findings and Action

Review Area	Finding	Action
MPO Organizational Structure	Recommendation	CMAP is encouraged to redevelop the local dues program in a timely and complete manner with an eye to equity, stability, and long-term implementation.
Agreements and Contracts	Recommendation	CMAP and its planning partners should update older intergovernmental agreements to ensure that ongoing roles and responsibilities are consistent with regional, state, and federal expectations, including those in the IJA passed in November 2021, and that the most current information is incorporated.
Agreements and Contracts	Recommendation	CMAP is encouraged to work with RTA and the boards to cooperatively develop mutually agreeable written procedures for data collection and reporting that comply with 23 CFR 450.314(h).
Metropolitan Transportation Plan	Recommendation	It is recommended that the subsequent MTP development effort after the ON TO 2050 Update revisit the threshold criteria for Regionally Significant Projects.
Metropolitan Transportation Plan	Commendation	CMAP is commended for leading the regional partners through the Mobility Recovery initiative.
Financial Planning	Recommendation	The documentation of regional resources in the TIP is still not well defined and largely speculative. The Review Team encourages additional work between CMAP and IDOT to better document assumptions for available resources.
TIP and Project Selection	Commendation	CMAP and IDOT are commended for action to ensure that lower capacity communities have reasonable access to federal funds without an undue burden caused by a lack of resources for required local matching funds through the use of Transportation Development Credits for Highways.
TIP and Project Selection	Commendation	CMAP and IDOT are commended for coordination in the development of PM3 traffic congestion and mobile source emissions targets.
TIP and Project Selection	Commendation	RTA is commended for its ongoing efforts to develop an updated plan for the future of transit operated by CTA, Metra, and Pace.
Public Participation Plan	Commendation	CMAP is commended for their expanded use of virtual public engagements to include more tools and methods to meaningfully reach people during the pandemic.
Public Participation Plan	Recommendation	The review team recommends CMAP update its Public Participation Plan in the near future

Public Participation Plan	Recommendation	It is recommended CMAP update their public website to make key planning documents and committee materials more accessible.
Self Certification	Recommendation	Improved compliance with Title II of the Americans with Disabilities Act of 1990 is necessary.
Title VI and Nondiscrimination	Commendation	The federal team commends CMAP for their Improving Equity in Transportation Fees, Fines, and Fares report and for their ongoing coordination with partners to raise up transportation equity issues.
Congestion Management Process	Recommendation	An update to the formal CMP document in FY 2023 will provide the region an opportunity to continue to build on the long range planning efforts of ON TO 2050 and CMAP's performance based programming.
Listing of Obligated Projects	Recommendation	USDOT continues to recommend 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.
Environmental Mitigation	Commendation	CMAP is commended for providing leadership in the advancement of PEL studies that examine highway-rail grade crossings.
Transportation Systems Management and Operations	Recommendation	The MPO should continue to 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	Observation	The utilization of policy-based safety targets has been ineffective in reducing fatalities and serious injuries and their continued use may even be counterproductive to achieving safer results.
Transportation Safety Planning	Recommendation	CMAP has indicated a possible willingness to establish regional safety targets based on data and the Federal Review Team strongly endorses this approach.
Transportation Safety Planning	Commendation	CMAP is commended for the introduction of the Safety Action Agenda.
Integrating Freight in the Transportation Planning Process	Recommendation	CMAP is encouraged to work closely with partners in the development of proposed projects under the Illinois Competitive Freight Funding Program. Additional priority may be desirable for projects that demonstrate a significant degree of project readiness to ensure the timely and efficient obligation and expenditure of National Highway Freight Program funds.
Climate Resiliency and Adaptation	Commendation	CMAP is commended for initiating the Regional Transportation Vulnerability Assessment.

Review Process

The Chicago TMA's first certification review occurred in 1992. Since then, FHWA and FTA have conducted certification reviews every four years. The most recent review was completed in 2018. This report details the results of the 2022 certification review. Since the review occurred in the long shadow of the COVID-19 pandemic, FHWA and FTA made some adjustments to the process in order to ensure a safe and fully engaged meeting environment. Some of the changes made included:

- Delaying the on-site review by several months in order to ensure a safe in-person meeting environment and avoid a fully virtual experience
- Using technology to allow for a hybrid on-site review, with staff from multiple agencies attending virtually, helping to minimize travel and reduce in-person attendance
- Holding the public comment component during a previously scheduled virtual MPO Policy Committee meeting

Participants in the review included representatives of FHWA, FTA, IDOT, RTA, and MPO staff. Appendix A lists the participants who attended the on-site meetings held on March 8-10, 2022.

FHWA and FTA staff completed a desk audit of current documents and correspondence before the on-site visit. In addition to the formal review, routine oversight provided a key source of information on which to base the certification findings.

This report covers the transportation planning process developed cooperatively by the MPO, State, and public transportation operators. FHWA and FTA focused on the following subject areas for the review:

- MPO structure and agreements
- Unified planning work program (UPWP)
- Metropolitan transportation plan (MTP)
- Transit planning
- Transportation improvement program (TIP)
- Public participation
- Civil rights (Title VI, environmental justice, limited English proficiency, Americans with Disabilities Act)
- Consultation and coordination
- Environmental mitigation
- Land use planning/livability
- Air quality
- Congestion management process (CMP)/management and operations

For each subject area, the report summarizes background information, current status, key findings and recommendations.

Documents Reviewed

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

- Responses to the Advanced Review Questionnaire
- [Metropolitan Transportation Plan \(ON TO 2050\)](#)
- [Transportation Improvement Program \(2019-24\)](#)
- [eTIP Public Site](#)
- [Unified Work Program \(Fiscal Year 2023\)](#)
- [Memorandum of Understanding between the MPO Policy Committee and CMAP Board](#) (2019)
- [CMAP By-Laws \(June 2021\)](#)
- [CMAP Council of Mayors](#)

- [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](#)
- [STP Active Program Management Policies](#)
- [STP Shared Fund Active Program \(FY 2022-2026\)](#)
- [Program Development for Congestion Mitigation and Air Quality Improvement Program \(FY 2022-2026\) and Transportation Alternatives Program \(FY 2022-2026\)](#)
- [CMAQ and TAP Project Initiation \(December 2019\)](#)
- [CMAQ Mid-Point Performance Plan \(October 2020\)](#)
- [Public Participation Plan \(June 2019\)](#)
- [Congestion Management Process](#)
- [1981 MPO Designation Letter](#)
- [CMAP/IDOT Intergovernmental Agreement concerning Federal Performance Measures - 2018](#)
- [CMAP/IDOT/RTA and Service Boards Agreement - 2018](#)
- [CMAP/NIRPC/IDOT/INDOT Cooperative Agreement - 2016](#)
- [CMAP/SEWRPC/IDOT/WisDOT Cooperative Agreement - 2018](#)
- [Transportation/Air Quality Planning Agreement for Goose Lake Township](#)
- [CMAP/IEPA Agreement for Coordination of Air Quality Related Transportation Planning](#)
- [Certification of the Planning Process \(June 2021\)](#)
- [5307/5340 Designated and Direct Recipients](#)
- [5310 Designated Recipients](#)
- [IL/IN Urbanized Area split of 5307/5340](#)
- [IL/WI Urbanized Area split of 5307/5340](#)
- [MPA Boundary Endorsement](#)
- [MPA Boundary Governor Approval](#)
- [MPA Boundary](#)
- [Regional Intelligent Transportation System \(ITS\) Architecture](#)
- [Regional Intelligent Transportation System \(ITS\) Architecture – Maintenance Plan](#)

FHWA and FTA also reviewed information on the subject areas provided on the CMAP's website.

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.

A Memorandum of Understanding (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 June 13, and June 19, 2019. 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.

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. The current Chair is IDOT Secretary Omer Osman and Vice-Chair at the time of this review was RTA’s Executive Director Leanne Redden.

MPO Policy Committee Member Agencies and Representatives

<i>Representing</i>	<i>Name</i>	<i>Position</i>
Council of Mayors	Jeffery Schielke	Mayor (City of Batavia)
Chicago Dept. of Transportation (CDOT)	Gia Biagi	Commissioner
Illinois Dept. of Transportation (IDOT)	Omer Osman	Transportation secretary
Illinois State Toll Highway Authority	José Alvarez	Executive director
Class I Railroads	Liisa Stark	Assistant vice president, public affairs-northern region (Union Pacific Railroad)
Cook County	Jennifer (Sis) Killen	Department of Transportation and Highways superintendent
DuPage County	Deb Conroy	County board chair
Kane County	Corinne Pierog	County board chair
Kendall County	Scott Gryder	County board chair
Lake County	Sandy Hart	County board chair
McHenry County	Mike Buehler	County board chair
Will County	Jennifer Bertino-Tarrant	County Executive
Regional Transportation Authority (RTA)	Leanne Redden	Executive director
Chicago Transit Authority (CTA)	Dorval Carter	President
Commuter Rail Div. of the RTA (Metra)	Jim Derwinski	Executive director/CEO
Suburban Bus Division of the RTA (Pace)	Richard Kwasneski	Chairman

Chicago Metropolitan Agency for Planning (CMAP)	Frank Beal	Senior executive (Civic Consulting Alliance)
Chicago Metropolitan Agency for Planning (CMAP)	Matt Brolley	President (Village of Montgomery)
Federal Highway Administration (FHWA)*	Arlene Kocher	Division administrator - Illinois
Federal Transit Administration (FTA)*	Kelley Brookins	Regional administrator, Region 5

*The Federal Highway Administration, the Federal Transit Administration and the Class I Railroads participate in an advisory and non-voting capacity.

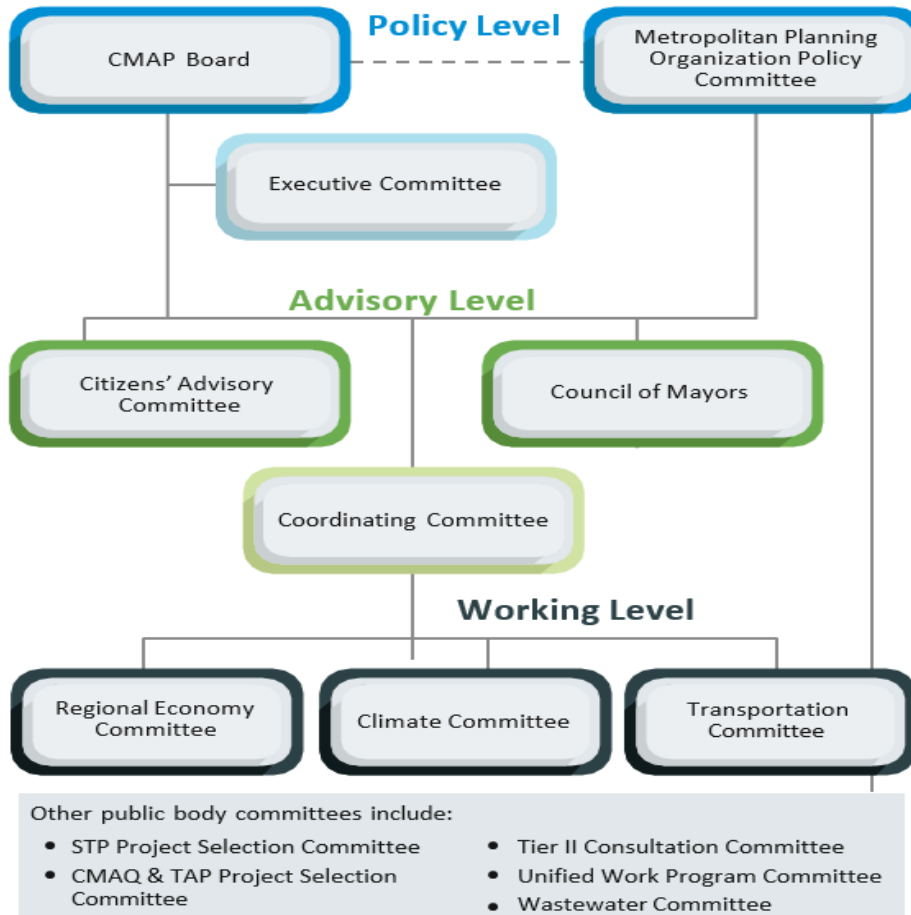
On November 14, 2018, the CMAP Board approved changes to CMAP's committee structure to facilitate a swift transition from development and adoption of ON TO 2050 to action, thus assuring implementation of the plan. The result is the establishment of a singular Coordinating Committee that will allow members to consider development of interconnected policy, programming, and planning projects. CMAP's Coordinating Committee, is made up of representatives from the Board and the five working committees. The Coordinating Committee reports to the Board and is responsible for both local implementation and regional policy challenges.

CMAP recently approved further committee changes. On January 12, 2022, the Board approved a new strategic direction for the committees to better prioritize the ON TO 2050 goals and identify the focus areas in which the agency can most effectively advance those goals. The strategic direction will leverage partners' and community expertise to align with the three focus areas: transportation, regional economy, and climate, and is working to re-align committees, diversify committee membership, and broaden opportunities for the agency to convene subject matter experts and community representatives in working advisory groups and task forces.

CMAP's Board thus created the Climate Committee and the Regional Economy Committee, while reaffirming the current Transportation Committee. The Climate Committee and Regional Economy Committee will primarily draw members from current agency committees and include new members with relevant expertise and experience. The executive director will appoint members with subject expertise having a direct nexus to the agency's strategic plan and workplan, representative of the region's geographic diversity and having diverse community and professional perspectives. Staff is in the process of identifying remaining members who will fill gaps in expertise and qualifications for both committees

Other public body committees include the STP Project Selection Committee, the CMAQ & TAP Project Selection Committee, Tier II Consultation Committee, the Unified Work Program Committee, and the Wastewater Committee. Finally, the organization also contains the Advisory Level Committees.

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.



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 Metropolitan Planning Organization (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 284 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 (PL). PLs 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 Transportation Improvement Program.

The Transportation Committee is at the working committee level and provides input into the Coordinating Committee and 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.

The Executive Director of CMAP is Ms. Erin Aleman, whose position is overseen by the Executive Committee of the CMAP Board. Ms. Aleman leads a staff of roughly 120 persons who are divided into the following areas: policy development, planning and programming; research and analysis; local planning;

finance and administration; communication and engagement; and legislative affairs. 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 first restructured their 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. Since the adoption of the program the agency has consistently collected 97 percent of all local dues invoiced, and yet CMAP is overwhelmingly supported by Federal and State transportation planning funds. The non-federal match to US DOT funding is largely provided by the State through IDOT. CMAP is revisiting the local dues program and looking to develop a new strategy, including updated rules and guidelines as well as an assessment process. 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.

In 2020 CMAP relocated their office to the redeveloped Old Main Post Office at 433 West Van Buren Street. Like many agencies and companies, CMAP has seen increased turnover in recent years due in part to pandemic accelerated shifts in workplace organization and structure. Most CMAP employees at the time of the review took advantage of work-from home options for at least part of their work week and many committee meetings remain virtual. To better meet the employment challenges of the moment, CMAP has explored the use of contractors and consultants in addition to making adjustments to the agency's pay and benefit levels

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

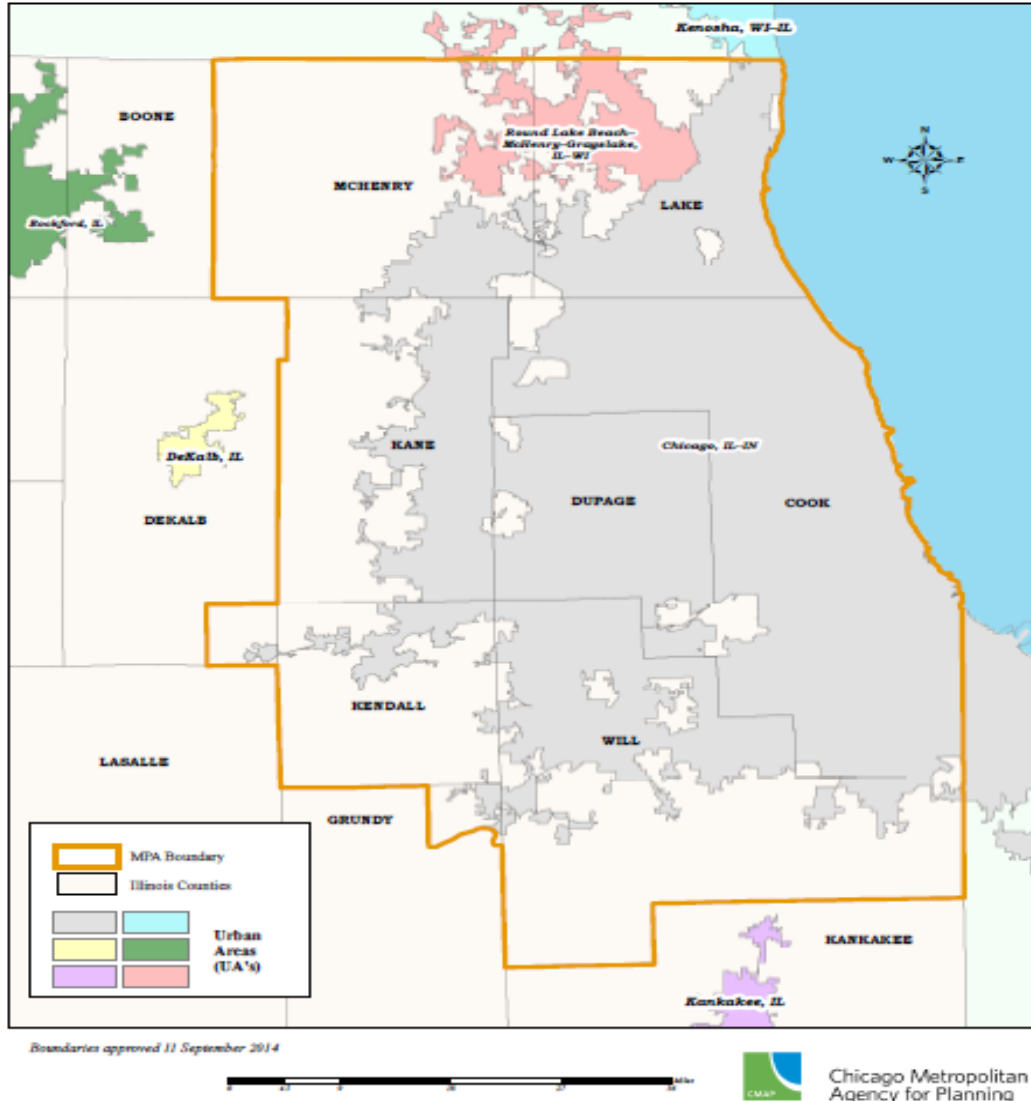
While State and Federal funding remains strong at the moment, history suggests that CMAP needs to continue to require fees for participating member agencies to ensure a stable financial future. CMAP is encouraged to redevelop the local dues program in a timely and complete manner with an eye to equity, stability, and long-term implementation. The MPO should also continue to explore additional revenue options to reduce the risk of over-reliance on the State of Illinois for matching Federal transportation planning funds.

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.

Chicago Metropolitan Agency for Planning: Metropolitan Planning Area Boundary



Status: The current 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 all of the EPA-defined nonattainment area for Ozone in NE IL 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 nonattainment area. CMAP, Grundy County, IDOT and the Illinois Environmental Protection Agency (IEPA) signed a Memorandum of Understanding 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.

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

With any potential changes from Census 2020 still pending, CMAP is encouraged to consider the impacts of an expansion of the Census-defined UZA and continue to plan and prepare for opportunities and challenges.

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 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 (2018)
3. 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. 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.

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

CMAP and its planning partners should update older intergovernmental agreements to ensure that ongoing roles and responsibilities are consistent with regional, State, and Federal expectations, including those in the IJA passed in November 2021, and that the most current information is incorporated.

As the Service Boards Agreement lays out, CMAP is encouraged to work with RTA and the boards to cooperatively develop mutually agreeable written procedures for data collection and reporting that comply with 23 CFR 450.314(h).

Section 2-4: Unified Planning Work Program (UPWP)

Regulatory Basis: MPOs are required to develop Unified Planning Work Programs (UPWPs) 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 Unified Work Program (UWP) 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 (discussed further under Section 2-1: MPO Organizational Structure).

The UWP is annually developed through the CMAP UWP 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. IDOT chairs the committee and votes in instances of a tie. Non-voting members include IEPA, FHWA and FTA.

The UWP Committee works to set program priorities in alignment with the recommendations and implementation actions of the region's long-range plan, ON TO 2050. CMAP's Transportation Committee also considers the UWP priorities prior to the annual project selection process.

Eligible agencies develop project proposals and submit them to the UWP Committee for review. Projects required to meet Federal regulations are selected first in the Core Program, with a second tier of Competitive projects reviewed and ranked by the Committee. The Committee has been discussing how this structure could be improved as more funding is needed for the MPOs and Core activities. Many projects approved for funding through the program experience significant delays, particularly in the procurement process. CMAP is looking to address these issues and modernize the Committee, within the context of an ongoing agency-wide committee review and re-structuring.

Though there are challenges, the current format of the UWP is acceptable and the description of the work to be undertaken is thorough. Proposed Core and Competitive projects are evaluated according to

performance measures agreed on by the committee whose recommendations are taken to the Transportation Committee and ultimately to the MPO Policy Committee for final approval.

Finding: CMAP satisfies the regulatory requirements for the Unified Planning Work Program.

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). 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, UWP and long range comprehensive plan (ON TO 2050) 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 their ON TO 2050 plan and has incorporated these principles throughout the planning and development process.

Finding: CMAP satisfies the regulatory requirements for 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 ON TO 2050 Plan was adopted in October 2018 in accordance with the provisions of the FAST Act and its Update is scheduled for approval in October 2022. The Plan update will continue to advance the three overarching principles from ON TO 2050 that support the regional vision and will be relevant across all the plan’s strategies: Resilience, Inclusive Growth, and Prioritized Investment.

Where possible, each ON TO 2050 recommendation is tracked by one or more indicators to set targets and monitor progress. Because changes to patterns of development or mobility take time, the Plan designates targets for both 2025 and 2050. The targets are not simple forecasts of current trends but instead are intended to represent optimistic, but achievable, outcomes that assume the implementation of ON TO 2050. To provide consistency over time, many indicators have been carried forward from GO TO 2040, the predecessor to ON TO 2050, with some improved data sources or analytical approaches. The Indicators can be accessed through a dashboard are grouped in six categories:

- Community
- Prosperity
- Environment
- Governance
- Mobility
- Inclusive Growth

The ON TO 2050 Plan includes a Systems Performance Report which presents the condition and performance of the transportation system with respect to required performance measures and approved performance targets, and reports on progress achieved in meeting the targets in comparison with previous reports and the baseline. Each section of the report includes a description of the research that informed the target selection and a description of CMAP’s efforts to integrate the targets into the programming process and the TIP. The targets identified are intended to tie directly to ON TO 2050 policy priorities and are linked to several long-range plan indicators and, where possible, the financial plan.

CMAP historically 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 expanded the view of the region’s transportation system by redefining “Regionally Significant Projects” to be projects which either:

- Costs at least \$100 million and either (a) changes capacity on the National Highway System or is a new expressway or principal arterial, or (b) changes capacity on transit services with some separate rights of way or shared right of way where transit has priority over other traffic
- Costs at least \$250 million and improves the state of good repair for a particular highway or transit facility

The thresholds for Regionally Significant Projects (RSPs) in ON TO 2050 was intended to provide for a reasonably sized universe of project to be considered and allow the plan to identify and prioritize the most critical projects in the region and to focus resources on accomplishing them. While the Plan Update is still in development, it is apparent that these thresholds are capturing many arterial roadway projects that may not be fully representative of the intended highest priority considerations or representative of the multi-modal goals of the region.

As Northeastern Illinois returns to post-pandemic operations, CMAP is working with regional partners to develop a visionary Mobility Recovery strategy that can support an equitable recovery, sustain the transit

network, and ease a rebound in congestion. Under the guidance of a steering committee, CMAP is working with consultants to develop a regional mobility action plan and implement strategies from ON TO 2050, to address new challenges and critical issues that have worsened during the pandemic. During this project, CMAP will:

- Identify and study innovative mobility policies from around the world.
- Assess COVID-related changes to jobs, housing, and transportation patterns.
- Model different transportation scenarios that could happen post-pandemic and the effect these changes could have on northeastern Illinois.
- Identify strategies that can address transportation challenges and embrace opportunities for improved regional mobility.

Final recommendations are expected in the fall of 2022. The efforts of the Mobility Recovery initiative are expected to help guide ON TO 2050 implementation and frame issues and discussions needed to be considered in the development of the next metropolitan transportation plan.

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

It is recommended that the subsequent MTP development effort after the ON TO 2050 Update, revisit the threshold criteria for Regionally Significant Projects. The goal for RSPs should be to provide for a reasonably sized universe of project to be considered and allow the plan to identify and prioritize the most critical projects in the region and to focus resources on accomplishing them.

CMAP is commended for leading the regional partners through the Mobility Recovery initiative. It is expected that the subsequent metropolitan transportation plan development may be largely impacted by the goals and strategies identified by Mobility Recovery.

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 FHWA 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: 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. 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, STP-SF, CMAQ, or TAP-L funds.

The ON TO 2050 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 (\$461.7B) over the plan horizon was slightly less than expenditures for operating, administering, and maintain the transportation system (\$485.8B). In order to fiscally constrain the financial plan and include desired modernization and expansion activities, an additional \$56.0B was identified through reasonably available revenues. A key component of the reasonably available revenues was realized during this certification cycle as the State of Illinois passed the Rebuild Illinois program and doubled the State gas tax. Certain funding sources, like congestion pricing, tolling, public-private partnerships, and value capture are specific to particular projects. In the financial plan, they are used to offset the public cost of specific Regionally Significant Projects as opposed to being included as reasonably available revenue.

The development of the financial plan included feedback generated over three years from CMAP committees as well as individual meetings and conversations with transportation implementing agencies and other stakeholders.

While the ON TO 2050 Update is still under development, essential elements of the financial plan have advanced. Largely from significant increased financial commitments in the BIL and Rebuild Illinois, it has been determined that core revenues will exceed system operation and maintenance expenses. However, with this increased flexibility, the planning partners must now coalesce with how to utilize the financial plan to identify and pursue regional priorities.

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

While discussions have been held and improvements made, the documentation of regional resources in the TIP is still not well defined and largely speculative. The Review Team encourages additional work between CMAP and IDOT to better document assumptions for available resources.

Forecasted transportation revenues and expenditure allocations, 2019-50, in billions (year of expenditure dollars)

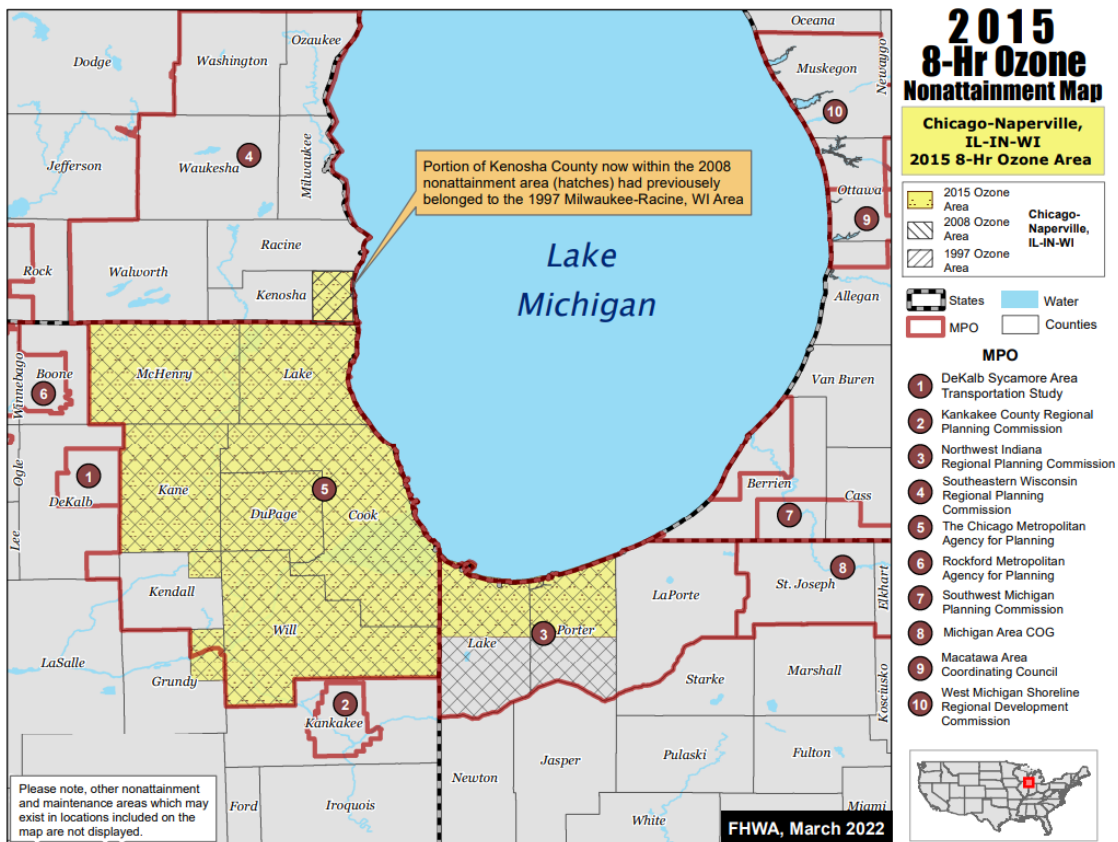
Revenues	
Federal revenues	\$61.9
State revenues	\$166.8
Local revenues	\$233.0
Subtotal core revenues	\$461.7
Increase the state MFT and replace with a road usage charge	\$31.0
Expand the sales tax base to additional services	\$11.0
Federal cost of freight service fee	\$7.0
Regional revenue source	\$5.0
Local parking pricing expansion	\$2.0
Subtotal reasonably expected revenues	\$56.0
Total revenues	\$517.7
Expenditures	
Operate and administer roadway system	\$114.9
Operate and administer transit system	\$162.9
Maintain current roadway condition	\$126.8
Maintain current transit asset condition	\$81.1
Subtotal cost to administer, operate, and maintain in current condition	\$485.8
Improve system condition	\$9.5
Make system enhancements	\$17.6
Full cost of constrained regionally significant projects	\$72.7
Capital cost allocated as maintenance and reconstruction	-\$50.3
Offsetting revenues from tolling and value capture	-\$17.5
Subtotal constrained new capacity cost of regionally significant projects	\$4.8
Total expenditures	\$517.7

*Note: expenditures do not add up to the totals due to rounding

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 designates 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: In December 2021, the Illinois Environmental Protection Agency (IEPA) submitted their Redesignation Request and Maintenance Plan for the Illinois portion of the Chicago Ozone Nonattainment Area for the 2008 ozone standard. The U.S. EPA notice to take corresponding action has been published through the Federal Register and no public comment was received. It is anticipated that the proposed redesignation to attainment will be authorized by the U.S. EPA in 2022.



Even if the Chicago-Naperville, IL-IN-WI region is redesignated to attainment with the 2008 ozone National Ambient Air Quality Standards (NAAQS), the region is in nonattainment with the more stringent 2015 ozone NAAQS. Under that standard of .70 parts per million (ppm) averaged over 8-hours, the region currently has a nonattainment classification as Marginal. However, because the region did not reach the required August 2021 attainment date, the Marginal classification is in the process of being elevated to Moderate which is expected to be finalized in 2022. The boundaries of the 2015 nonattainment area are now coterminous with the boundaries of the 2008 nonattainment area as McHenry County was added back into this geography after initially being designated as attainment with the 2015 standard.

The Northeastern Illinois region is currently considered in attainment status with all particulate matter standards.

The region’s current conformity determination covers the ON TO 2050 Plan and FY 2023 – 2028 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.

8 Hour Ozone (2015) Classification Design Values*	
Extreme:	.163 ppm and above
Severe-17:	.111 to .162
Severe-15:	.105 to .110
Serious:	.093 to .104
Moderate:	.081 to .092

Interagency consultation involves CMAP, RTA, IDOT, IEPA, 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.

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

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 State Transportation Improvement Program (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 and maintains 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.

CMAP continues to administer an online electronic TIP (eTIP) database that contains all details about approved TIP projects, a record of amendments and modifications, and search tools for locating projects geographically and by project or funding type. An interactive map of projects is also available. In 2021, a new module was added for performance measures that is intended to help improve the collection of project-based information for the analysis of projects to meet regional and Federal performance targets. eTIP has separate secure and public sites with the public site displaying 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. 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 regional STP, CMAQ, and TAP programs.

Surface Transportation Block Grant Program

Federal legislation provides a suballocation of Surface Transportation Block Grant (known regionally as STP) funding to the MPO from funds apportioned to the State of Illinois. The distribution of funding and programming procedures are outlined in an agreement between the Council of Mayors and City of Chicago that was updated and endorsed by the MPO Policy Committee. This agreement established a competitive Shared Fund (STP-SF) for accomplishing large regional projects and made changes to the local (STP-L) council and City of Chicago distribution of funding and programming methodologies to place more emphasis on Performance-Based Programming decisions and accomplishment of the goals of ON TO 2050. The Shared Fund is programed through the MPO Policy Committee with the development and review of the program overseen by a STP Project Selection Committee.

The STP is administered through calls for projects conducted every two years with the call for Shared Fund projects held concurrent with CMAQ and TAP-L and calls for local projects held during the in between years. The STP development process builds multi-year programs that are subject to active program management policies that focus on accelerating project implementation to ensure the obligation of Federal funds.

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

CMAP programs CMAQ and TAP funds through the MPO Policy Committee with the development and review of each program overseen by the CMAQ and TAP Project Selection Committee. 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 preliminary 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.

In 2017, a FHWA final rule took effect that establishes systems performance measures (PM3) that State DOTs 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. Traffic congestion and mobile source emissions measures consist of total emissions reductions, annual hours of peak hours excessive delay per capita, and percent of non-single occupancy travel. While IDOT officially sets these targets, CMAP and the East-West Gateway Council of Governments (St. Louis, MO-IL MPO) administer the programming of CMAQ funds in Illinois and therefore lead the development of these PM3 targets. Baseline targets were established in 2018 and CMAP submitted a Mid Period Performance Plan in 2020. In establishing targets, CMAP staff coordinated with IDOT, the Indiana Department of Transportation, and the Northwest Indiana Regional Planning Commission (NIRPC) to ensure consistency to the maximum extent practical.

Transit Funding

The Chicago, IL, IN UZA receives FTA Federal formula funding under four programs: 5307 Urbanized Area Formula Funds, 5337 State of Good Repair Formula Funds, 5339 Bus and Bus Facility Formula Funds, and 5310 Enhanced Mobility for Seniors and Individuals with Disabilities. The process of dividing these funds is outlined in agreements between the states and MPOs and culminate in annual allocation agreements. The Regional Transportation Authority (RTA) and NIRPC collaborate to suballocate the FTA apportionment between the Illinois and Indiana portions of the UZA, developing a Letter of Understanding (LOU) for each FTA funding program. For the neighboring Round Lake-Beach-McHenry-Grayslake, IL-WI UZA, RTA similarly collaborates with the Southeastern Wisconsin Regional Planning Commission (SEWRPC) to develop annual LOUs for each FTA funding apportionment, suballocating the funds between the Illinois and Wisconsin portions of the UZA.

RTA is also responsible for annually suballocating the Illinois portion of the Chicago IL, IN UZA FTA formula funds between the RTA's Service Boards, consisting of Chicago Transit Authority (CTA), Northeast Illinois Regional Commuter Railroad Corporation (Metra), and Pace Suburban Bus (Pace). RTA coordinates with IDOT's Office of Intermodal Project Implementation to conduct a competitive process for funding projects under the 5310 program. Federal formula funds, including 5307, 5337, and 5339 program funds, are currently programmed using a historic agreed upon split between the three operators. In July 2021, the RTA Board adopted a new performance-based programming method set to begin in 2025 and is currently included in the 2023-2027 regional transit capital program. The new allocation methodology uses three key principles: Addressing capital reinvestment need, incentivizing timely completion of projects, and addressing policy priorities.

RTA works with the service boards to prioritize capital investments using measures outlined in the strategic plan. At the time of the Federal on-site visit RTA's plan was titled Invest in Transit. Each service board annually updates their 10-year priority projects list, which includes projects that the service boards intend to advance as funding becomes available. Project that are included in the capital program should first be included in the priority project list before advancing to funded status. Further, capital projects are evaluated based on strategic goals and core requirements outlined in Invest in Transit. Beginning with the 2024-2028 Capital Program, fifteen new measures will be evaluated for each project included in the program to better explain the selection of projects entering the program.

During the pandemic, transit operations in the region were able to continue due in part to 5307 funds from the Federal Coronavirus Aid, Relief, and Economic Security (CARES) Act that passed in March 2020 and the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) that passed in

December 2020. In November 2021, the RTA Board of Directors voted to approve allocation of the third Federal COVID relief funding package, the American Rescue Plan Act of 2021 (ARP), signed into law on March 11, 2021. The ARP Act approved \$30.5 billion of nationwide relief funding for transit and allocated approximately \$1.5 billion of that to the greater Chicago IL-IN-WI Urbanized Area (UZA). All three COVID-19 pandemic relief funding programs provided flexibility to the transit agencies in large UZAs such as the Chicago region, uniquely allowing for transit agencies in these areas to fund operating costs as well as the traditional capital costs.

RTA worked to quickly suballocate these much-needed relief funds to the Service Boards. RTA used the same methodology for CARES Act funding as it does for other Federal formula funding. CRRSAA funding, was subsequently allocated based on an analysis of transit Critical Need Areas which considered residents' propensity to use transit, equity, and employment in industries that were likely to require in-person work. The ARP Act funding was allocated based on projected revenue shortfalls in the Service Boards' proposed 2022-2024 budgets.

RTA proved to be a true leader in the Chicago region during the difficult past few years. Undertaking a long-term, strategic planning approach to develop a new regional plan, RTA is working to replace the Invest in Transit plan adopted in 2018. The new plan, titled Transit is the Answer, will reflect new and anticipated circumstances resulting from the COVID pandemic and its ongoing ramifications for transit and the economy. This multi-year effort was still underway at the time of the Federal on-site visit was conducted and has included a vast, diverse stakeholder group and strong engagement process, despite the challenge of doing so during an ongoing and shifting pandemic.

Finally, the collaboration between CMAP, RTA, and the Service Boards on transit matters has only grown stronger within the region over the pandemic years and all agencies are acknowledged for their efforts in this area. One example of this effort has been ongoing discussions between CMAP, RTA, and Service Board staff regarding how best to represent transit projects in the TIP. In December of 2021, staff from these agencies met to discuss transit projects in the eTIP database, the development of transit programming marks used in the TIP, how to represent FTA funds in the current TIP, and eTIP database changes that may be necessary with the passage of BIL. These discussions have resulted in improved transparency of transit projects within the eTIP with all Service Boards agreeing to include more details in their TIP entries.

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

CMAP and IDOT are commended for action to ensure that lower capacity communities have reasonable access to Federal funds without an undue burden caused by a lack of resources for required local matching funds. The STP and CMAQ Project Selection Committees adopted a policy to utilize Transportation Development Credits for Highways as local match for STP-SF, STP-L, CMAQ, and TAP-L funding which was subsequently approved by the IDOT Bureau of Planning and Programming.

CMAP and IDOT are commended for coordination in the development of PM3 traffic congestion and mobile source emissions targets.

RTA is commended for its ongoing efforts to develop, in light of the substantial transportation and economic changes brought on by the COVID-19 pandemic, an updated plan for the future of transit operated by CTA, Metra, and Pace.

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 COVID-19 pandemic has shifted public outreach in unique and interesting ways, and CMAP has shown leadership in trying new techniques and processes to engage the public. The public engagement team has always proactively engaged in promoting and seeking public involvement early and continuously throughout the planning process in the development of regional plans and programs. CMAP has always met with many community organizations with emphasis on minority and economically disadvantaged communities throughout the seven-county region. Limits imposed by the pandemic required new ways of engaging in order to continue to do the valuable work of the agency.

Prior to COVID-19, CMAP used virtual public engagement alongside in-person events for development of the ON TO 2050 regional plan and for local planning projects, deploying online survey tools and the agency's Engage with CMAP platform for local planning and transportation projects. As the COVID-19 pandemic has constrained CMAP's in-person public engagement options, the agency has expanded its virtual public engagement to include more tools and methods to meaningfully reach people where they are. CMAP has proven a leader in these efforts, and as such their use of virtual public engagement was featured in the FHWA's video case studies on Virtual Public Involvement (VPI).

The CMAP developed a phased communications and engagement strategy for the ON TO 2050 Update which included information and engagement, formal public comment, and plan update approval. The plan identified stakeholders and prescribed engagement activities, with measurable objectives. To increase awareness, interest, and participation in development of the ON TO 2050 Update, CMAP shared information consistently through its various communications channels during the public comment period. This included Updating the Plan, a landing page on CMAP's website to provide detailed information on the ON TO 2050 Update, opportunities for public input, and more. By using multiple communications channels to keep the public informed about the plan update and when and how to provide input at key stages, CMAP secured valuable input from stakeholders through an open and accessible public process despite the impacts from the pandemic.

The CMAP Public Participation Plan (PPP) was updated in 2019 and 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 PPP shows a proactive approach to public involvement with CMAP outlining how to engage a diverse and broad community using a range of outreach tools and includes how the agency will evaluate and adjust the plan over time. The plan was developed prior to more recent changes in the world of public engagement brought on by the pandemic, and while it captures many of the popular tools currently used for outreach, it does not address what success might now look like in this new environment or other what other potential engagement challenges and opportunities the agency is preparing for.

CMAP uses its public website to share a wealth of information on the region and engage the public on many initiatives. The sections of the site dedicated to the ON TO 2050 plan are easy to follow, interactive, and engaging, making it easier for the public to understand and participate in the process. The Program pages of the site offer detailed information on a number of important topics the agency works on. The agency website contains supporting materials for a range of users, from those new to such topics to those engaged in advocating for them. Despite this, many of CMAP's federally required documents remain hard to reach or buried under committee pages, some of which are not intuitive to anyone but the most engaged citizens. Important analysis and discussions occur during each of the many committee meetings, but due in part to the transition of committee materials to a new platform, some of these are unavailable or difficult to find.

CMAP excels in helping to educate the public and get data and information out to everyone, particularly the press and civic leaders. CMAP's Executive Director and staff regularly attend events and forums to disseminate some of the important research and analysis the agency does for the region which helps engage the public in the mission and goals of the agency. This is an important voice in the region. CMAP provides a level of expertise and non-partisanship that helps drive discussion on such diverse topics as congestion, stormwater and flooding, economic sustainability, system accessibility, equity, and climate change.

Finding: CMAP satisfies the regulatory requirements for the public involvement process.

CMAP does an excellent job reaching out to, coordinating with, and engaging stakeholders. They are commended for their expanded use of virtual public engagements to include more tools and methods to meaningfully reach people where they are during the pandemic.

The review team recommends CMAP update its Public Participation Plan in the near future to account for the new and emerging tools and challenges in stakeholder and public engagement, including how to evaluate success in such a dynamic environment. One suggestion would be to make the plan more of a living document that is updated more frequently.

Additionally, CMAP should update their public website to make key planning documents and committee materials more accessible to the public. Many documents are in unexpected locations or buried under various committee pages, particularly as CMAP looks to migrate materials to a new meeting platform. CMAP's committee restructuring also presents a challenge and an opportunity to improve the accessibility of decision-making documents and reports.

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

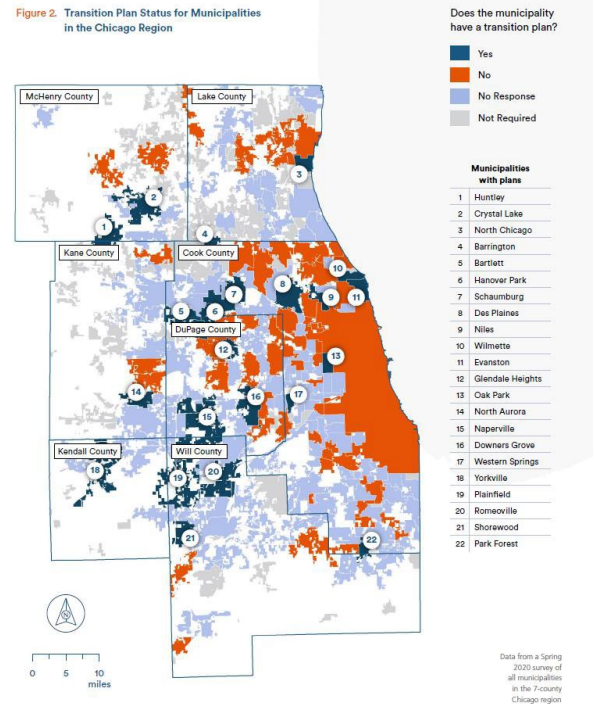
- The provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) and 49 CFR Parts 27, 37, and 38;
- The Older Americans Act, as amended (42 U.S.C. 6101), prohibiting discrimination on the basis of age in programs or activities receiving Federal financial assistance
- Section 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 Metropolitan Planning Council, an independent nonprofit organization, released a 2021 report entitled “Where the Sidewalk Ends” that provided a first of its kind assessment in the Chicago region of the status and quality of ADA transportation plans for the public right-of-way. The report found that a remarkably low percentage of communities had a Transition Plan and that the quality of the plans in existence varied greatly.

“Where the Sidewalk Ends” prompted numerous discussions between Federal, State, regional, and local partners. While IDOT and CMAP had both taken steps in previous years to encourage local agency Title II compliance, it was acknowledged that the lack of Transition Plans and Self-Evaluations was inconsistent with the prosperous, equitable region envisioned by the MPO planning process. At the June 2021 MPO Policy Committee meeting where the most recently Self-Certification was adopted by the MPO Policy Committee, FHWA Illinois Division Administrator Arlene Kocher discussed the importance of the ADA and encouraged all partners to commit to substantial improvement in the region. With additional financial support from IDOT, CMAP has developed a multifaceted program to bring municipalities in the CMAP region into compliance with Title II and to support implementation of ADA Transition Plans.

Major program elements for the near-term include:

- Title II Compliance – CMAP will work with municipalities to ensure an ADA Public Notice has been published and will work with municipalities with 50 or more employees to ensure they have adopted a local grievance procedure and appointed an ADA Coordinator
- Education – Using a mixture of staff and contractors, CMAP will educate municipal staff and leaders on a variety of ADA topics through written pieces, videos, municipal and subregional meetings, convenings, and trainings.
- Outreach and Engagement – CMAP will use staff and contractors to develop and implement an outreach and engagement program targeting municipal officials, individuals with disabilities, disability stakeholder organizations and other allied organizations and individuals.
- Programming and Funding – CMAP will explore changes to CMAP-managed funding programs that will encourage communities to complete self-evaluations and transition plans and implement them.
- Self-Evaluations and Transition Plans – CMAP will use staff and contractors to build the region’s



capacity to conduct self-evaluations efficiently and effectively and to develop and implement transition plans based on the results of those self-evaluations.

IDOT has committed to support CMAP's efforts in Northeastern Illinois and has initiated and is leading a similar strategy and approach for the rest of the State.

Finding: Improved compliance with Title II of the Americans with Disabilities Act of 1990 is necessary.

The Federal Review Team has carefully reviewed the MPO's response to the MPC "Where the Sidewalk Ends" report and CMAP's proposed multi-year program to bring municipalities in the region into compliance with Title II and to support implementation of ADA Transition Plans. FHWA and FTA endorse the proposed program and will monitor its progress closely. Non-compliance with Title II of the Americans with Disabilities Act will be a consideration in the acceptance the MPO's self-certification and could jeopardize future Federal funding.

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

CMAP's planning process incorporates Title VI considerations in the development of its transportation planning documents. 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.

In April 2021 CMAP released an assessment of the impacts of fees, fines, and fares on residents with low income. This report, entitled Improving Equity in Transportation Fees, Fines, and Fares, recommends policy changes to improve equity. Following the ON TO 2050 principle of Inclusive Growth, the report acknowledges that many households with low income are unbanked or underbanked, that systemic racism creates inequities in transportation safety and enforcement, and that unpaid fines can be financially

devastating, the report recommends several paths toward a more equitable system. These include, but are not limited to, improving mobility options, piloting fee and fare coordination, implementing fine reform, and increasing access to cost-saving tools.

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

The Federal team commends CMAP for their Improving Equity in Transportation Fees, Fines, and Fares report and for their work ongoing coordination with partners to raise up transportation equity issues.

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 MPO's formal Congestion Management Process is integrated into planning and programming through activities such as coordinating planning for operations and management of the transportation system, encouraging land use policy changes including consideration of freight delivery impacts, and promoting regional data sharing. CMP performance measures are a subset of a larger group of ON TO 2050 Indicators and CMAP maintains an interactive dashboard to visualize the most current data. The measures are also integrated in CMAP performance-based programming processes for STP-Shared Fund, CMAQ, and TAP funding. The region has highlighted and prioritized strategies such as implementing congestion pricing, emphasizing maintenance and operations, improving the competitiveness of transit, and harnessing technology. The update of the MPO's Congestion Management Process document has been included in the agency's Comprehensive Budget and Work Plan and will be completed in FY 2023.

Finding: The MPO satisfies the requirements for developing and maintaining a Congestion Management Process. An update to the formal CMP document in FY 2023 will provide the region an opportunity to continue to build on the long range planning efforts of ON TO 2050 and CMAP's performance-based programming.

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: CMAP produces an annual “Obligations and Performance Report” 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. Starting with the FY 2019 report, the document also describes how the programmed and obligated project phases affect the achievement of Federal and ON TO 2050 performance targets.

The Obligated Projects reports have historically been issued in excess of regulatory deadlines and at irregular intervals. The most recent report covers Federal fiscal year 2019 and was issued in December 2020. 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, ISTHA, 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: CMAP satisfies the regulatory requirements for the list of obligated projects.

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. CMAP should continue to explore ways to make award and obligation data informative and useful to future decision making.

USDOT continues to recommend 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 USC 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 USC 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: CMAP has investigated creating a pipeline of grade crossing improvement projects through a PEL program that would initiate planning-level feasibility studies that could make subsequent Phase 1 preliminary engineering studies more economical and efficient. CMAP released a Request for Qualifications for feasibility studies for up to five at-grade rail-highway crossings which resulted in partnering with local governments to lead two studies: CREATE project GS-18, the BNSF Railroad at Harlem Avenue in Berwyn and Riverside and the Union Pacific Railroad at Laraway Road in Joliet which

is on a high-speed passenger rail corridor. The studies employ the Federal PEL process to prepare a federally coordinated draft "purpose and need," planning-level cost estimates, and screened alternatives to be carried forward to future engineering studies.

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

CMAQ is commended for providing leadership in the advancement of PEL studies that examine grade crossings. While the use of PEL is not required, it is encouraged by FHWA and FTA and potential outcomes include creating one cohesive flow of information, elimination of duplicative efforts in the planning and NEPA processes, improved relationships, early consultation and collaboration among stakeholders, accelerated project delivery, better built and natural environmental outcomes, timely permit decisions, and mutually beneficial outcomes.

Section 2-16: 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: The ON TO 2050 Plan supports the concepts that operational improvements should be a priority option in considering how to improve mobility in the region and that non-recurring congestion cannot be alleviated through capacity improvements. The ON TO 2050 Update's financial plan will maintain the region's priority on funding the maintenance and preservation of the system.

CMAQ periodically surveys households throughout Northeastern Illinois about their travel habits. The My Daily Travel survey was completed in 2019 and reflects travel patterns and preferences in the region prior to the COVID-19 pandemic. While patterns changed in response to the pandemic, the survey may reveal long term travel trends that may reassert themselves as recovery continues.

CMAQ has merged the Regional Transportation Operations Coalition (RTOC) and the Advanced Technology Task Force (ATTF). These entities had historically overlapped in scope and committee membership and have begun meeting under the banner of the Transportation Technology and Operations Coalition (TTOC). TTOC serves as a forum for collaboration to advance multi-modal transportation systems operations and was active in the updating the Northeastern Illinois regional Intelligent Transportation System (ITS) Architecture in 2020.

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

Transportation management and operations considerations are prevalent throughout the planning process. The MPO should continue to 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 2-17: Transportation Safety Planning

Regulatory Basis: The IIJA 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 Departments of Transportation and Metropolitan Planning Organizations 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 VMT
- Number of Serious Injuries
- Rate of Serious Injuries per 100 million VMT
- 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 how the MPO reports the targets to its respective DOT. 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. 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: Since the establishment of safety targets, the State of Illinois has annually set an aspirational policy-based target of a 2 percent reduction from the five-year average for each of the five measures. The majority of MPOs in Illinois, including CMAP, have adopted these targets on an annual basis. FHWA determines whether the State has met or made significant progress towards meeting the Statewide targets but does not directly assess MPO progress towards meeting targets. The 2019 Safety Performance Target Assessment determined the State had not met or made significant progress towards its safety performance measures.

Illinois 2019 Safety Performance Target Assessment

PERFORMANCE MEASURE	2015-2019 TARGET	2015-2019 ACTUAL	2013-2017 BASELINE	MET TARGET?	BETTER THAN BASELINE?	MET OR MADE SIGNIFICANT PROGRESS?
Number of Fatalities	977.5	1,042.0	1,016.2	No	No	No
Rate of Fatalities	0.920	0.972	0.956	No	No	
Number of Serious Injuries	11,727.4	11,448.6	12,182.4	Yes	N/A	
Rate of Serious Injuries	11.040	10.682	11.476	Yes	N/A	
Number of Non-Motorized Fatalities and Serious Injuries	1,431.7	1,548.8	1,505.8	No	www.fhwa.dot.gov/tpm/report	

Growing dissatisfaction with repeatedly setting targets but not seeing correlating results prompted additional discussion and attention on traffic safety at the MPO Policy Committee, CMAP Board, and

through the working committees. At the direction of the CMAP Transportation Committee, CMAP has incorporated a Safety Action Agenda into its annual Unified Work Program, a multi-pronged traffic safety program aimed at understanding and addressing the range of issues that threaten users of the region's transportation network.

The Safety Action Agenda includes five primary work components:

- Convening partners on the topic of safety and forming the basis for a regional safety coalition
- Developing policy recommendations on key safety topics for the region including speed management and bicycle and pedestrian safety
- Local technical assistance planning services for locations with safety concerns
- Integration of safety into project selection processes
- Improved access for local partners to safety related data

CMAP continues to include traffic safety in program and project evaluations. The CMAQ and STP- Shared Fund programs incorporate safety into project evaluations and many of the eleven Council of Mayors STP-L project evaluations included safety as a measure. Traffic safety is included in the evaluation of regional significant projects in the ON TO 2050 regional plan and plan update.

CMAP has also expanded its focus on safety to its Local Technical Assistance program which has awarded funding for a local road safety plan for the Village of Flossmoor. The plan will contain recommendations for all relevant safety related roadway infrastructure improvements and identify opportunities to include and improve the behavior of all roadway users. Additionally, the plan will explore issues such as equitable enforcement, emergency response, and safe routes to school. It is anticipated that the Flossmoor plan may be able to serve as a model for other communities throughout the region.

Furthermore, CMAP was awarded a State Planning and Research (SPR) grant by IDOT to further analyze speeding related crashes and identify problem locations. The SPR grant includes funding to purchase data and hire a consultant to analyze regional vehicle speed data to identify corridors where vehicle speed issues coincide with high rates of crashes. CMAP plans to potentially work with the agency that has jurisdiction over the identified corridor and help implement safety countermeasures and policies to make the corridor safer for all roadway users through speed management.

Finding: IDOT and CMAP satisfy the regulatory requirements for transportation safety planning. However, the utilization of policy-based safety targets has been ineffective in reducing fatalities and serious injuries and their continued use may even be counterproductive to achieving safer results.

CMAP has indicated a possible willingness to establish regional safety targets based on data and the Federal Review Team strongly endorses this approach. The establishment of regional, data driven targets would not position the region for additional funding, flexibility, or discretionary competitiveness and could invite additional scrutiny to the MPO and local governments should targets not be met. However, assuming responsibility for these results may be crucial for galvanizing efforts to place greater emphasis on safety considerations throughout planning, programming, and project development processes. The MPO is uniquely positioned in public policymaking to provide leadership in establishing and strengthening a safety culture that may transcend individual agency and jurisdictional impediments.

CMAP is commended for the introduction of the Safety Action Agenda and the Review Team sees great potential for improving safety planning efforts at the regional and local levels. The efforts and goals of the Safety Action Agenda also has substantial overlap with the FHWA Safe System Approach which calls for placing safety first and foremost in road system investment decisions. As the region strives towards this

goal, particular attention should be placed on shared responsibility among the planning partners and equity considerations for traditionally underserved populations and vulnerable users.

Section 2-18: 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 USC 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: In February 2021, IDOT initiated a two-year process of updating its State Freight Plan. A call for projects under the State's Competitive Freight Funding Program will be held in 2023 and these projects will be added to the State's Freight Investment Plan. Illinois receives \$45-50 million annually under the National Highway Program and some selected projects under previous Competitive Freight Programs have not advanced to construction. As a result, nearly \$80 million in NHFP funds have been transferred to other programs due to the inability for selected freight projects to advance to construction.

IDOT also continues to administer an 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. CMAP also administers a Freight Working Group 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 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.

CMAP has advanced several freight planning initiatives including:

- Adoption of a Regional Freight Strategic Direction that articulates the CMAP freight policy agenda for the near term
- Multijurisdictional truck routes studies in the O'Hare Airport area, Will County, and southern Cook County
- Working with IDOT to further simplify the administrative process of truck route designation
- Prioritization of 47 highway-rail crossings for study and construction, several of which were subsequently advanced to PEL studies or preliminary environmental studies by CMAP or partner agencies.
- Advocating for freight electrification to reduce particulate emissions in vulnerable communities where freight land use clusters are concentrated
- Worked with the Argonne National Laboratory to analyze potential impacts of overnight deliveries using the Polaris dynamic traffic assignment system

The planning process continues to support the CREATE program. 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. The Regional Strategic Freight Direction prioritized the 75th Street Corridor Improvement Project which has advanced the first elements to construction.

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

CMAP is encouraged to work closely with implementing agencies, IDOT, and the State Freight Advisory Council in the development of proposed projects under the Illinois Competitive Freight Funding Program. Additional priority may be desirable for projects that demonstrate a significant degree of project readiness to ensure the timely and efficient obligation and expenditure of National Highway Freight Program funds.

Section 2-19: Climate Resiliency and Adaptation

Regulatory Basis: The Moving Ahead for Progress in the 21st Century Act (MAP-21) required each State to develop a risk-based asset management plan for the National Highway System (NHS) to improve or preserve the condition of the assets and the performance of the system. MAP-21 established the National Highway Performance Program (NHPP), to help ensure that investments of Federal-aid funds in highway construction supports progress toward achievement of performance targets established in a State's required asset management plan. To conserve Federal resources and protect public safety, MAP-21 also mandated periodic evaluations to determine if reasonable alternatives exist to roads, highways, or bridges that repeatedly require repair and reconstruction. MAP-21 also allowed the FHWA to provide Federal aid funds for construction, replacement, rehabilitation, preservation, and protection (including protection against extreme events) of bridges and tunnels on the NHS (23 U.S.C. § 119(d)(2)(B) and (C)) and on public roads of all functional classifications. The FAST Act continued the NHPP and expanded funding eligibility specifically to projects that reduce the risk of failure of critical NHS infrastructure.

While the Bipartisan Infrastructure Law (BIL) is outside of the scope of this review, it will evolve the NHPP to explicitly identify mitigation of costs of damages from sea level rise, extreme weather events, flooding, wildfires, or other natural disasters as a priority of the program. BIL also adds specific consideration of extreme weather and resilience as a requirement of the State's asset management plan. Furthermore, the BIL creates the Promoting Resilient Operations for Transformative, Efficient, and Cost-saving Transportation (PROTECT) grant program, devoting \$8.7 billion to support state and local assessments, planning, and projects that reduce the vulnerability of transportation assets to natural disasters. Grant recipients can receive financial incentives if Resiliency Improvement Plans (RIPs) are developed and incorporated into statewide or metropolitan transportation plans.

The metropolitan and statewide transportation planning regulations in 23 CFR 450.324(g)(7) include a requirement that the metropolitan transportation plan assess capital investment and other strategies that reduce the vulnerability of the existing transportation infrastructure to natural disasters.

FHWA Order 5520, Transportation System Preparedness and Resilience to Climate Change and Extreme Weather Events, states that it is FHWA policy to strive to identify the risks of climate change and extreme weather events to current and planned transportation systems, and to integrate consideration of these risks into its planning, operations, policies, and programs in order to promote preparedness and resilience.

Status: The growing awareness that a changing climate can affect transportation has not yet resulted in widespread actions to identify and implement strategies to address climate change. The FHWA Order,

ongoing national research activities, and pilot projects are intended to promote transportation system resiliency, defined as the ability to anticipate, prepare for, and adapt to changing conditions and withstand, respond to, and recover rapidly from disruptions. Much of the work to date has been focused on assessing vulnerabilities and considering transportation infrastructure and design adaptation.

CMAP has initiated a Regional Transportation Vulnerability Assessment (RTVA) to better understand the impacts of extreme weather and climate change on the region's transportation system. This assessment will examine the vulnerability of different transportation assets – such as roadways, railroads, and bridges – to common hazards including flooding, extreme heat and cold, and freeze-thaw cycles. The results will help prioritize funding and can inform transportation planning and programming, project design, asset management, operations and maintenance, and emergency management.

CMAP initiated Phase 1 of a two-phase process to conduct the RTVA and develop a RIP for the region. Phase 1 is intended to identify the hazards, assets, and criticality criteria to be included in the subsequent RTVA and RIP, which will be completed in Phase 2. CMAP is using the process outlined in the FHWA's Vulnerability Assessment and Adaptation Framework and partnered with FHWA Resource Center to help conduct a series of scoping workshops.

Resiliency remains one of three overarching principles in the ON TO 2050 Plan Update and is discussed in terms of facing economic, fiscal, and environmental uncertainties. IDOT's first Transportation Asset Management Plan was approved by FHWA in 2019 and the most recent update of their Transit Asset Management Plan was completed in 2018.

Finding: CMAP is commended for initiating the RTVA as events such as flooding, severe heat, and intense storms threaten the long-term investments that Federal, State, and local governments have made in transportation infrastructure throughout the region. While transportation systems can already experience costly climate related impact leading to disruption and damaged roads, bridges, rail systems, and other transportation infrastructure, these impacts are projected to intensify in magnitude, duration, and frequency across the United States.

Part 3: Certification Review Site Visit Participant List

Erin Aleman, CMAP
Victoria Barrett, CMAP
Holly Bieneman, IDOT
Michael Brown, CMAP
Jonathan Burch, CMAP
Lynette Ciavarella, Metra
David Clark, CMAP
Kahlil Clemons, IDOT
Teri Dixon, CMAP
Doug DeLille, IDOT
Kama Dobbs, CMAP
John Donovan, FHWA
Jim Durako, IDOT
Kate Evasic, CMAP

Doug Ferguson, CMAP
Tony Greep, FTA
Jane Grover, CMAP
Alan Ho, FHWA
Jessica Hector-Hsu, RTA
Craig Heither, CMAP
Tom Kelso, IDOT
Jon-Paul Kohler, FHWA
Michael Kowalczyk, FHWA
David Kralik, Metra
James Kyte, FHWA
Jill Leary, RTA
Angela Manning-Hardimon, CMAP
Amy McEwan, CMAP
Timothy McMahon, CMAP

Martin Menninger, CMAP
Tom Murtha, CMAP
Jason Navota, CMAP
Stephane Phifer, CMAP
Russell Pietrowiak, CMAP
Chad Riddle, IDOT
Yousef Salama, CMAP
Steve Schielke, IDOT
Todd Schmidt, CMAP
Elizabeth Scott, CMAP
Ryan Thompto, CMAP
Dave Tomzik, Pace
Betsy Tracy, FHWA
Michael Vanderhoof, IDOT
Mary Weber, CMAP
Simone Weil, CMAP

Part 4: Certification Review Site Visit Meeting Agenda

TUESDAY, MARCH 8TH

- 1:00-3:00 Introduction and Overview
 - Program Development
 - UWP Committee Role
 - Funding Sources
 - eTIP System and Process
 - 2020 Census Preparations
 - IIJA Preparations
 - STP Program Changes
 - Transit Partnerships
 - *Federal Co-Leads – Tony Greep, FTA & John Donovan, FHWA*
- 3:15 – 4:30 Freight & Congestion Program
 - Congestion Management Program
 - Regional Freight Strategic Vision
 - *Federal Lead – Betsy Tracy, FHWA*

WEDNESDAY, MARCH 9TH

- 8:30 – 10:15 Organization and Administration of the Planning Process
 - COVID-19 Operational/Organizational Impacts
 - Organizational Structure & Changes
 - Roles & Responsibilities
 - Agreements and Contracts
 - *Federal Lead – Tony Greep, FTA*
- 10:30 – 12:00 ON TO 2050 Plan Update & Other Initiatives
 - Update Status and Timeline
 - COVID-19 and IIJA Impacts
 - Transportation Vulnerability Assessment
 - ADA/Title II Compliance Program
 - *Federal Lead – John Donovan, FHWA*
- 12:00 – 1:00 Lunch
- 1:00 – 2:00 Public Participation & Inclusion
 - COVID-19 Outreach
 - Equity & Inclusion
 - Environmental Justice
 - *Federal Lead – Tony Greep, FTA*
- 2:15 – 4:00 Performance-Based Planning and Programming
 - Transportation Safety Planning
 - Highway Safety Performance Measure Target Setting
 - Data Sharing
 - Transit Asset Management Plan
 - Annual Transit Target Setting Provisions
 - *Federal Lead – John Donovan, FHWA*

THURSDAY, MARCH 10TH

- 8:30 – 9:30 Federal Team Meeting
- 9:30 – 11:30 MPO Policy Committee Meeting
- 11:30 – 12:00 Preliminary Findings Discussion with CMAP Team