



U.S. Department  
of Transportation

Federal Highway  
Administration

Federal Transit  
Administration

# Transportation Management Area Planning Certification Review

## Kalamazoo Area Transportation Study (KATS)

### Kalamazoo, MI Transportation Management Area



**February 06, 2024**

**Summary Report**





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## 1.0 EXECUTIVE SUMMARY

On October 11<sup>th</sup> and 12<sup>th</sup>, 2023, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted a hybrid on-site certification review of the transportation planning process for the Kalamazoo urbanized area. FHWA and FTA are required to jointly review and evaluate the transportation planning process for each urbanized area over 200,000 in population at least every four years to determine if the process meets the Federal planning requirements.

### 1.1 Previous Findings

The findings and MPO response from the previous certification review in 2020 are provided in Appendix B of this report.

### 1.2 Summary of Current Findings

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

As a result of this review, FHWA and FTA are **certifying** the transportation planning process conducted by the Michigan Department of Transportation (MDOT), Kalamazoo Area Transportation Study (KATS) Metropolitan Planning Organization (MPO) and Metro. There are also recommendations in this report that warrant close attention and follow-up, as well as areas that MPO is performing very well in that are to be commended. In total, the federal review team found **2 commendations and 10 recommendations**.

Commendation 1	<u>MPO Organization and Administration</u> – The MPO’s “KATS 101” training for new members is an innovative approach to address loss of institutional knowledge due to member turnover.
Commendation 2	<u>Metropolitan Transportation Plan (MTP)</u> – KATS has completed significant work in expanding equity and safety through the development of their Complete Streets Implementation Plan. Additionally, the MPO’s use of non-motorized data in their planning process and project selection advance FHWA/FTA Planning Emphasis Area topics related to Complete Streets.
Recommendation 1	<u>Transit</u> – KATS should ensure that its locally-adopted transit performance measures for the Metropolitan Planning Area are fully incorporated into its planning documents, and that these are clearly and easily accessible to the public.
Recommendation 2	<u>Public Participation Plan</u> – KATS must demonstrate that it has followed through with the outreach procedures and strategies in their PPP. This will be accomplished by the MPO periodically reviewing their effectiveness and making improvements to the Plan based on their assessments.



Recommendation 3	<u>Virtual Public Involvement (VPI)</u> –KATS should develop a VPI and social media strategy and implementation plan to capture and expand on future outreach activities. This VPI/Social Media strategy can help to increase access to the community and should be incorporated into the MTP and TIP development processes.
Recommendation 4	<u>MPO Organization and Administration</u> : KATS should provide a complete organizational chart and description of subcommittees on their website. This could also include pertinent information on subcommittee structure, purpose, and composition.
Recommendation 5	<u>Metropolitan Transportation Plan (MTP)</u> – KATS should consider local conditions or other potential drivers of cost in their calculation. They currently assume a 2% average growth in costs over a 20-year horizon, but inflation over the past 3 years has significantly outpaced this.
Recommendation 6	<u>Performance Based Planning and Programming (PBPP)</u> – MDOT should consider additional coordination with the MPOs to ensure the specific written provisions for performance measure coordination are up to date. To best support statewide Transportation Performance Measure requirements, a best practice for MDOT to consider is creating a web-based dashboard showing performance measure trends that makes data visible, accessible, and easily understandable to all.
Recommendation 7	<u>Civil Rights</u> – We recommend making the KATS LEP Plan available on the MPO website to make it easily attainable by the public.
Recommendation 8	<u>Civil Rights</u> – We recommend MDOT and KATS continue to review its Title VI Complaint procedures and Title VI Complaint form to ensure the laws, regulations, and guidance that govern administrative complaints under Title VI are accurate. The form should be fillable online, and complaints must go to MDOT for investigation instead of the MPO. Additionally, it is recommended that MDOT shares the Title VI complaint process and the oversight hierarchy flowchart created with KATS and all other MPOs.
Recommendation 9	<u>Civil Rights</u> – We recommend KATS update its ADA complaint form to ensure its easily accessible online, fillable, and easy to submit to KATS’s ADA point of contact.
Recommendation 10	<u>Travel Demand Forecasting</u> – The federal review team recommends working with MTPA, FHWA, and MDOT to explore options for maintaining and updating Travel Demand Models to alleviate concerns with the increased costs of updating and maintaining their travel demand model..

Details of the certification findings for each of the above items are contained in this report.



## 2.0 INTRODUCTION

### 2.1 Background

Pursuant to 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMAs) at least every four years. A TMA is an urbanized area, as defined by the U.S. Census Bureau, with a population of over 200,000. In general, the reviews consist of three primary activities: a site visit, a review of planning products (in advance of and during the site visit), and preparation of a Certification Review Report that summarizes the review and offers findings. The reviews focus on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the MPO(s), the State DOT(s), and public transportation operator(s) in the conduct of the metropolitan transportation planning process. Joint FTA/FHWA Certification Review guidelines provide agency field reviewers with latitude and flexibility to tailor the review to reflect regional issues and needs.

The Certification Review process is only one of several methods used to assess the quality of a regional metropolitan transportation planning process, compliance with applicable statutes and regulations, and the level and type of technical assistance needed to enhance the effectiveness of the planning process. Other activities provide opportunities for this type of review and comment, including Unified Planning Work Program (UPWP) approval, the Metropolitan Transportation Plan (MTP), metropolitan and statewide Transportation Improvement Program (TIP) findings, air-quality (AQ) conformity determinations (in nonattainment and maintenance areas), as well as a range of other formal and less formal contact provide both FHWA/FTA an opportunity to comment on the planning process. The results of these other processes are considered in the Certification Review process.

### 2.2 Purpose and Objective

Since the enactment of the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, the FHWA and FTA, are required to jointly review and evaluate the transportation planning process in all urbanized areas over 200,000 population to determine if the process meets the Federal planning requirements in 23 U.S.C. 134, 40 U.S.C. 5303, and 23 CFR 450. The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), extended the minimum allowable frequency of certification reviews to at least every four years.

Kalamazoo Area Transportation Study is the designated MPO for the Kalamazoo urbanized area. MDOT is the responsible State agency and Metro is the responsible public transportation operator. Current membership of the KATS MPO consists of elected officials and citizens from



the political jurisdictions in the MPO boundary. The study area includes all of Kalamazoo County, part of Van Buren County, with the City of Kalamazoo as the largest population center.

Certification of the planning process is a prerequisite to the approval of Federal funding for transportation projects in such areas. The certification review is also an opportunity to provide assistance on new programs and to enhance the ability of the metropolitan transportation planning process to provide decision makers with the knowledge they need to make well-informed capital and operating investment decisions.

## **3.0 SCOPE AND METHODOLOGY**

### **3.1 Review Process**

This report details the findings and process for the planning certification review for the Kalamazoo region. The review process consisted of a desk review, hybrid site visit, and a public involvement opportunity, which was conducted on October 12<sup>th</sup>, 2023, as part of the MPO's regularly scheduled Technical Committee Meeting. The first Kalamazoo certification review was conducted in 2016 and a subsequent certification review was conducted in 2020. A summary of the status of findings from the 2020 review is provided in Appendix B.

Participants in the review included representatives of FHWA, FTA, MDOT, Metro, and KATS MPO staff. A full list of participants is included in Appendix A.

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

The certification review covers the transportation planning process conducted cooperatively by the MPO, State, and public transportation operators. All aspects of the planning process within the MPO boundary were reviewed and assessed by the Federal Review Team. Background information, current status, key findings, and recommendations are summarized in the body of the report for the following subject areas selected by FHWA and FTA staff for the on-site review:

1. Transit Planning
2. Public Participation
3. MPO Organization and Administration
4. Metropolitan Transportation Plan (MTP)
5. Performance Based Planning and Programming (PBPP)
6. Civil Rights (Title VI, EJ, LEP, ADA)
7. Freight Planning
8. Travel Demand Forecasting



## 3.2 Documents Reviewed

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

- MPO Master Agreement, 2023
- FY 2024 Unified Planning Work Program for the KATS MPO
- MPO Metropolitan Transportation Plan, 2050
- MPO FY23-26 TIP and Self-Certification
- FY20, FY21, and FY22 Audited Financial Statements
- Title VI Plan and FY23 Draft Title VI Plan
- 2023 Draft Public Participation Plan and 2018 PPP
- Southwest Michigan Non-Motorized Transportation Plan
- 2014 Complete Streets Policy





## 4.0 PROGRAM REVIEW

### 4.1 Transit Planning

#### 4.1.1 Regulatory Basis

49 U.S.C. 5303 and 23 U.S.C. 134 require the transportation planning process in metropolitan areas to consider all modes of travel in the development of their plans and programs. Federal regulations cited in 23 CFR 450.314 state that the MPO in cooperation with the State and operators of publicly owned transit services shall be responsible for carrying out the transportation planning process.

#### 4.1.2 Current Status

Public Transportation in the Kalamazoo Urban Area is provided by the Central County Transportation Authority (CCTA), an entity created in 2014 as part of an effort to regionalize public transportation in the area. In 2018, after public input, the system was renamed to “Metro”, which included a full rebranding of the bus system. The service consists of fixed route and complementary paratransit service. During the COVID-19 pandemic, Metro lost approximately one-third of its staff, necessitating a reduction in service: eliminating late night service and lengthening headways up to an hour on some routes. Today, ridership is still recovering from the steep pandemic drop-off. In the first half of 2023, ridership was approximately 900,000 (Reported Unlinked Passenger Trips), representing a 24% increase from that period in the previous year, but still about two-thirds of the ridership from that period in 2019. Metro’s goal is to return to their pre-pandemic staff and ridership levels as soon as feasible. However, currently Metro does not see the need to restart the late-night service.

Metro provides free services to students and faculty under an agreement with Western Michigan University as well as some free bus passes to youth as part of a program with the public school system. Metro is interested in conducting additional outreach to students and youth as services rebound.

A Transit Comprehensive Operational Analysis (COA) Report was published for Kalamazoo Metro in February 2023. Public outreach for preparing the COA took place in early 2022 and consisted of a series of stakeholder and public meetings as well as a rider survey. The COA explored and recommended some limited route re-designs, new micro-transit opportunities in outlying service areas and during late night hours, and the development of three additional minor transit hubs to facilitate transfers between proposed micro-transit services and fixed routes. Subsequently, Metro has created a new deputy director position to lead the new micro-transit project with an estimated roll out of the new program in April of 2024. The new micro-transit service will initially be a two-year pilot program.



KATS worked with Metro on the COA and provided socioeconomic data. Metro advertised virtual public participation opportunities for the COA onboard buses and through their website. In the future, Metro would like to research the feasibility of new mobility hubs, where multiple buses are interconnected with other modes such as pedestrian, cycling, and on-demand rides. The federal team sees this as an opportune time to review the interconnectedness of all modes as KATS undergoes their complete streets implementation plan. Metro is also planning to begin a fare study in FY2024 which will evaluate the structure of the fare system, integration of new technology, and validators. The fare study will also be led by the new deputy director position.

Metro has applied with MDOT for Federal Bus and Low-or-No-Emission Bus competitive grants but have not received an award. MDOT has reached out for debriefs. Metro has a fleet transition plan created in collaboration with CALSTART and would like to use electric vehicles but there are concerns with their range due to Metro's route length and topography. Metro will continue to partner with KATS to use subscription-based route-planning software to best align service routes and levels with areas of need based on population, travel demand modeling, and socio-economic data.

A strong relationship is evident between KATS and Metro in carrying out transportation planning functions. The MPO was involved in the COA process and continues to be involved in assisting the micro-transit program and providing transit planning software and technical assistance. One area of improvement noted is coordination in transit performance-based planning standards.

FTA's Transit Asset Management (TAM) Rule was published in 2016 and the Public Transportation Agency Safety Plan (PTASP) Rule was published in 2018, each with incremental deadlines for transit agencies and MPOs to adopt and incorporate the new associated performance measures into their planning documents and practices. All locally established TAM and PTASP measures, targets, and data have been required to be fully integrated into the MPO's TIP, MTP, and System Performance Reports since 2021.

Appendix E of the 2050 MTP (approved November 2021) contains a brief System Performance Report including the Statewide Transit Asset Management (TAM) targets from MDOT relating to 5310 (specialized transit providers) and 5311 (rural transit providers) which are overseen at the state level. The MTP, however, omits the targets set on a local level for TAM, which are present in Kalamazoo Metro's TAM Plan and available from the KATS website as a separate download. Appendix E does include Metro's 2021 local Public Transportation Agency Safety Plan (PTASP) measures and targets but does not include baseline figures or a discussion on current conditions, needs, or investment priorities in relation to performance targets. A separate System Performance Report, published in 2022 similarly does not include all required elements, copying its material related to transit from Appendix E.

The latest 2023-2026 Transportation Improvement Program (TIP) contains a more complete description of TAM targets, including how the targets are set, the targets for Kalamazoo Metro (locally) and the State targets, and briefly, tie-ins to project prioritization. However, the TIP



does not include PTASP measures or targets. The TIP lacks a complete description of the anticipated effect of the TIP toward achieving performance targets, in relation to TAM and PTASP. The federal team discussed these concerns with the MPO and transit staff at the on-site meeting. The MPO staff was able to quickly show documents and resources they had on-hand that would fully address these concerns once incorporated into the next TIP and System Performance Report updates. Both KATS and Metro demonstrated understanding of the transit performance-based planning standards in discussions onsite and attested to consistent and reliable data sharing coordination between the two agencies.

### 4.1.3 Findings

#### **Recommendation:**

**Recommendation 1:** The Federal Team recommends that the MPO ensure that its locally adopted transit performance measures for the Metropolitan Planning Area (MPA) are fully incorporated into its planning documents, and clearly and easily accessible to the public. Specifically:

- The TIP needs to include the local PTASP performance measures and targets, the latest available baseline data for each measure in coordination with local transit partners, and a description of the anticipated effect of the TIP toward achieving the targets identified, linking specific projects to those performance targets.
- The MTP needs to include the local TAM performance measures and targets for the MPA and a discussion on current transit asset conditions, needs, and investment priorities in relation to the targets.
- The MPO's System Performance Reports need to include both the federally required transit performance measures (TAM and PTASP), associated targets, and the latest available recorded data, and consider utilizing data visualization and online tools to make transit system performance information clear and relevant to the public.

#### **Proposed FHWA/FTA Technical Assistance:**

- <https://www.transit.dot.gov/performance-based-planning>
- <https://www.transit.dot.gov/TAM>
- <https://www.transit.dot.gov/PTASP>



## 4.2 Public Participation

### 4.2.1 Regulatory Basis

Sections 134(i)(5), 134(j)(1)(B) of Title 23 and Section 5303(i)(5) and 5303(j)(1)(B) of Title 49, require a Metropolitan Planning Organization (MPO) to provide adequate opportunity for the public to participate in and comment on the products and planning processes of the MPO. The requirements for public involvement are detailed in 23 CFR 450.316(a) and (b), which require the MPO to develop and use a documented participation plan that includes explicit procedures and strategies to include the public and other interested parties in the transportation planning process.

Specific requirements include giving adequate and timely notice of opportunities to participate in or comment on transportation issues and processes, employing visualization techniques to describe metropolitan transportation plans and TIPs, making public information readily available in electronically accessible formats, holding public meetings at convenient and accessible locations and times, demonstrating explicit consideration and response to public input, and periodically reviewing the effectiveness of the participation plan.

Executive Order #12898 directs federal agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. In compliance with this Executive Order, USDOT and FHWA issued orders to establish policies and procedures for addressing environmental justice in minority and low-income populations.

The planning regulations, at 23 CFR 450.316(a)(1)(vii), require that the needs of those “traditionally underserved” by existing transportation systems, such as low-income and/or minority households, be sought out and considered.

### 4.2.2 Current Status

For the 2016 KATS Planning Certification Review, the Federal Team reviewed the MPO’s 2014 Public Participation Plan (PPP) and discussed areas of improvement with KATS, specifically identifying the need to expand on specific outreach strategies in the PPP to engage Environmental Justice (EJ) communities more effectively and proactively. The 2016 Federal Certification Report pointed to the need to go out into identified communities and document actual public involvement and outreach efforts undertaken, including attending/hosting meetings in local EJ community neighborhood venues, and targeting outreach to EJ-specific organizations, neighborhood groups, faith-based organizations, and media/newspapers. According to Recommendation 7 in the 2016 Certification Report, the MPO should update the PPP to, “add a measure of effectiveness that monitors the number of opportunities for



engagement provided to EJ populations. It is also recommended that a representative from an EJ population be appointed to the CAC.”

The next Certification Review assessed the MPO’s subsequent 2018 PPP and its public engagement activities between 2016-2019. Although the PPP was certified as meeting the federal requirements, and commended for the incorporation of performance measures, the MPO reported during that Review that they still had challenges getting meaningful public participation, especially from EJ communities. At the time, KATS staff was still “looking for a citizen representative from an environmental justice population to serve on the KATS Citizen Advisory Committee.” Specific outreach strategies in the PPP were described as traditional strategies including a quarterly newsletter, making planning documents available at local libraries, hosting open houses for planning document developments, and attending other agency events. Recommendation 4 in the February 2020 Federal Certification Report reiterated the need to conduct meaningful outreach to EJ populations: “KATS staff should develop an additional section in the PPP to address outreach activities to minority and low-income populations. Underserved populations typically require non-traditional outreach methods. KATS needs to plan and record results for outreach where projects have been identified in EJ areas.”

During the recent site visit, the federal review team expressed renewed concern that specific outreach to EJ communities continues to not be implemented and documented by the MPO in its planning activities.

There appear to be further strategies available including multiple existing local organizations that KATS could engage with to consistently reach a diverse population including Western Michigan University, [ISAAC](#), [Northside Ministerial Alliance](#), [City of Kalamazoo Neighborhood Associations](#), [Kalamazoo Township Neighborhood Associations](#), and the [Disability Network of Southwest Michigan](#). With these active groups, KATS has an opportunity to attend the organization’s meetings to reach underrepresented populations and ensure they are included in transportation conversations. The Federal team will continue to work with KATS to improve their PPP and ensure traditionally underserved groups are adequately represented.

The MPO has a Citizens Advisory Committee that meets quarterly and offers public input on plans, programs, and MPO actions. KATS also has a recently updated website and a social media presence on Facebook and Instagram. The Federal team noted that social media accounts appear to not be regularly updated. KATS reported that their Facebook account recently got deleted for unknown reasons and they had lost access to a lot of prior content that had been stored on the platform. The 2023 PPP incorporates a new social media platform, Next Door, into the plan.

While there has been no significant public feedback or controversies noted that indicated discriminatory practices, during the 2023 on-site meeting the MPO was unable to highlight instances of specific outreach to engage underrepresented groups in recent years. It was noted that there was no member of the Citizen Advisory Committee representative of an



environmental justice population or minority group. The Technical and Policy Committees could better reflect the demographic diversity of the area. It was reported that the MPO previously had one representative from a diversity-focused community advocacy group (ISAAC - Interfaith Strategy for Advocacy & Action in the Community) participating in their meetings, but the person had left and has not since been replaced.

The federal team discussed the importance of undertaking and documenting non-traditional methods of outreach post-pandemic to ensure diverse perspectives are heard in transportation planning activities and investment decisions. Non-traditional methods the federal team discussed with MPO staff included utilizing the broad resources and reach of local universities and colleges and their organized minority student groups, engaging interns and youth from local schools in EJ areas to help develop outreach materials and strategies for public engagement, and renewing efforts to get MPO staff out into these communities and engage with groups representing EJ interests, including coordinating MPO committee and project meetings with these groups to ensure they are better publicized, and taking place at times and locations, including virtually, that are accessible to underserved populations. The importance of documenting and publicizing specific engagements successes and following up with contacts on a consistent basis is important for building recognition, trust, and support for the planning process and its decisions. Further strategies are outlined in the [Promising Practices for Meaningful Public Involvement Guide](#) published by USDOT in 2022.

Seeking out and considering the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households who may face challenges accessing employment and other services, is a federal requirement under 23 CFR part 450.316(1)(vii) which stipulates that the MPO must develop explicit procedures, strategies, and desired outcomes for this outreach. Specifically, the federal team finds that KATS, at the time of the review, did not sufficiently demonstrate that explicit procedures and performance measures have been fully developed and implemented for outreach and involvement of traditionally underserved communities.

The 2050 Metropolitan Transportation Plan (MTP) and 2023-2026 Transportation Improvement Program (TIP) were developed using the processes and priorities included in the 2018 version of the PPP. Both the MTP and TIP development followed the procedures established in its adopted PPP by providing public postings of all Technical Committee and Policy Committee meetings and by advertising and holding multiple public meetings on the proposed FY 2023 – 2026 TIP and 2050 MTP. The Public Engagement findings for the MTP can be found in Chapter 8 of the document and a summary of all public comments received throughout the TIP planning process



is available in Appendix C of the TIP document. For transit, Kalamazoo Metro uses KATS's PPP to fulfill the agency's public participation planning requirements.

For the development of KATS 2050 Metropolitan Transportation Plan, the MPO provided various opportunities for public involvement and had engagement sessions held virtually via Zoom throughout October 2021.

While KATS reported that their committee members prefer in-person meetings, they also noted an increase in participation by their committee members during their KATS 101 trainings when held virtually. KATS has continued to use virtual participation since the onset of the COVID-19 pandemic as it has proven to be an efficient and convenient engagement tool. They have seen an increase in participation for their board member trainings when a virtual hybrid option is offered. The Federal Team notes that virtual public involvement (VPI) is still an important tool that should be incorporated into the PPP to reach people that may not be able to attend in person, which may include EJ populations. Given how KATS used VPI for community engagement during the COVID-19 pandemic, KATS has an opportunity to incorporate VPI into the PPP, lessons learned from the pandemic, and how future technology can be used to better engage with members of the public.

### 4.2.3 Findings

#### Recommendations:

Recommendation 2: Prior to the next Certification Review, KATS must demonstrate that it has periodically reviewed the effectiveness of the procedures and strategies contained in the PPP, and then made improvements to the Plan based on their assessments, that ensure the MPO has a full and open participation process, with explicit procedures, that successfully seek out and consider the needs of those traditionally underserved by existing transportation systems. Specific strategies that the Federal Team recommends KATS consider incorporating are in Appendix E.

- Public involvement effectiveness reviews should begin immediately in 2024 and be conducted at least annually. FTA and FHWA will monitor performance annually and provide technical assistance to KATS to improve its outreach strategies.
- KATS should annually report their PPP performance measures to their committees and adjust their public engagement strategies in response to the report.

Recommendation 3: The Federal Team recommends that KATS develop a virtual public involvement (VPI) and social media strategy and implementation plan to capture and



expand on future outreach activities. This VPI/Social Media strategy can help to increase access to the community and should be incorporated into the MTP and TIP development processes.

### **Proposed FHWA/FTA Technical Assistance:**

- [Promising Practices for Meaningful Public Involvement Guide](#)
- [Executive Order 12898 of February 11, 1994](#)
- [Inclusive Public Participation in Transit Decision-Making](#)
- [Public Involvement Techniques for Transportation Decisionmaking](#)
- [Practical Approaches for Involving Traditionally Underserved Populations in Transportation Decisionmaking](#)
- [Measuring the Effectiveness of Public Involvement in Transportation Planning and Project Development](#)

Examples of Measuring Effectiveness of Public Participation Plans:

- [Madison 2017 Evaluation](#)
- [Springfield, MO 2022 Evaluation](#)
- [Tampa 2022 Evaluation](#)

Virtual Public Involvement Resources:

- [EDC-6: Virtual Public Involvement | Federal Highway Administration \(dot.gov\)](#)
- [FHWA Virtual Public Involvement Toolkit \(VPI\)](#)

## **4.3 MPO Organization and Administration**

### **4.3.1 Regulatory Basis**

23 CFR 450.310 provides the parameters for MPO designation. 23 U.S.C. 134(d) and 23 CFR 450.314(a) state the MPO, the State, and the public transportation operator shall cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process. These responsibilities shall be clearly identified in written agreements among the MPO, the State, and the public transportation operator serving the MPA.

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, 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, including representation by providers of public





transportation; and (c) appropriate State transportation officials, according to 23 CFR 450.310(d).

The voting membership of an MPO that was designated or redesignated previously, 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, or the decision-making authority or procedures established under the MPO's bylaws. Any one of the MPO members can assert that a change in Policy Board structure is substantial and requires formal redesignation. 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. Federal regulations address situations where more than one MPO may be designated for an urbanized area: To the extent possible, only one MPO shall be designated for each urbanized area or group of contiguous urbanized areas.

More than one MPO may be designated to serve an urbanized area only if the Governor(s) and the existing MPO, if applicable, determine that the size and complexity of the urbanized area make designation of more than one MPO appropriate. In those cases where two or more MPOs serve the same urbanized area, the MPOs shall establish official, written agreements that clearly identify areas of coordination and the division of transportation planning responsibilities among the MPOs.

#### **4.3.2 Current Status**

The Kalamazoo Area Transportation Study (KATS) is designated as the metropolitan planning organization (MPO) for the Kalamazoo Transportation Management Area (TMA). The Kalamazoo Urbanized Area became a designated TMA (greater than 200,000 population) after the 2010 Census designations. The TMA population as of the 2020 Census is 204,562. The initial formation of the MPO began in 1966 and was initially organized within the Kalamazoo County governmental structure, operating at the direction of the KATS Policy Committee. KATS became a fully independent agency in 2013. Today, KATS consists of a Policy Committee, a Technical Committee, a Citizens Advisory Committee (CAC) and five full time staff led by Executive Director Steven L. Stepek. An MOU was signed by KATS, MDOT, and Metro (representing transit) on May 30, 2018. The MOU sets out planning responsibilities of KATS as the MPO and the scope, structure, and planning area boundaries of the agency.

The Policy Committee consists mainly of local elected and appointed officials from governmental units within the MPA, as well as various stakeholders. As of 2023, this was approximately 40 members, and included representatives of the City of Kalamazoo and 28 surrounding cities and townships, 2 Counties, 3 Transit Authorities, MDOT, Western Michigan University (WMU), and one member representing the CAC. The largest cities represented are Kalamazoo (pop. 73,598) and Portage (pop. 48,891). These cities, along with the two county roads commissions, each receive three votes each according to the Policy Committee By-Laws. The current version of KATS Policy Committee by-laws was adopted on July 26, 2006, and amended on March 26, 2014.



The Technical Committee consists of governmental officials and staff representatives from the governmental units within the MPA, as well as the transit authorities, MDOT, WMU, FTA, and FHWA, with transportation, planning, and/or administration responsibilities and technical expertise. The Technical Committee also includes a representative from the CAC. The number of members/votes for each local governmental unit is also determined by population as detailed in the by-laws. The current version of the KATS Technical Committee by-laws was adopted August 30, 2023.

A combined Technical Committee Meeting took place with the federal team onsite that was well-attended with approx. 40 members present and several members of the public in attendance.

The Citizens Advisory Committee (CAC) consists of an open membership of 5-9 interested citizens and residents living within the MPA, to provide for public discussions of transportation issues and input on MPO documents and actions. Members serve a term of 2 years, with the ability to reapply for a second term. The CAC provides residents and organizations within the MPA with the opportunity to explore and discuss transportation issues. The CAC also provides input to KATS staff and technical committee members related to the development of the MTP, TIP, and other major projects and services and serves an advisory role to the technical and policy committees.

During the on-site review, KATS discussed several subcommittees that they have created in response to plans and projects that are in-progress including committees focused on modeling, non-motorized users, and complete streets.

The KATS organizational structure is compliant with regulations as defined in 23 CFR 450.310. The composition of the KATS Policy Committee is appropriate, and representative of the transportation officials required. There have been no significant changes in committee structure since the last certification review. Discussions with KATS staff onsite related to the financing structure of the MPO and clarity regarding the varied set of subcommittees and working groups/task forces that may be established and active/inactive at any given time.

### **4.3.3 Findings**

#### **Commendation:**

Commendation 1: KATS has taken a novel and highly effective approach to address turnover and education of their board members, providing a “KATS 101” training for all new members. This training serves to familiarize new members with basic overviews of MPO functions, road and transit funding, as well as MPO funding and planning documents.

#### **Recommendations:**



Recommendation 4: The Federal Team recommends KATS provide a complete organizational chart and/or description of their subcommittees on their website. KATS should include pertinent information on the subcommittee structure, for example, defining existing subcommittees, how often they meet, the purpose of the subcommittee and the general composition of the subcommittee. With this information available on the website, members of the public will have a better understanding of the focus of the subcommittees, opportunities to participate, and the interrelation of the committees. This could also be a good location to solicit interest in being a CAC member.

## 4.4 Metropolitan Transportation Plan

### 4.4.1 Regulatory Basis

23 U.S.C. 134(c), (h) & (i) and 23 CFR 450.324 set forth requirements for the development and content of the Metropolitan Transportation Plan (MTP). Among the requirements are that the MTP address at least a 20-year planning horizon and that it includes both long and short range strategies that lead to the development of an integrated and multi-modal system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.

The MTP is required to provide a continuing, cooperative, and comprehensive multimodal transportation planning process. The plan needs to consider all applicable issues related to the transportation systems development, land use, employment, economic development, natural environment, housing, and community development.

23 CFR 450.324(c) requires the MPO to review and update the MTP at least every four years in air quality nonattainment and maintenance areas and at least every five years in attainment areas to reflect current and forecasted transportation, population, land use, employment, congestion, and economic conditions and trends.

Under 23 CFR 450.324(f), the MTP is required, at a minimum, to consider the following:

- Projected transportation demand
- Existing and proposed transportation facilities
- Operational and management strategies
- Congestion management process
- Capital investment and strategies to preserve transportation infrastructure and provide for multimodal capacity
- Design concept and design scope descriptions of proposed transportation facilities
- Potential environmental mitigation activities
- Pedestrian walkway and bicycle transportation facilities
- Transportation and transit enhancements



- A financial plan
- Pedestrian walkway and bicycle transportation facilities

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

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

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

#### **4.4.2 Current Status**

A finding from the last Federal Certification Review in February 2020 stated, "MTP will contain a more integrated non-motorized component. Currently the non-motorized plan is a separate document attached to the MTP. Staff noted non-motorized safety is a major concern for the area." The KATS 2050 MTP was approved November 17, 2021, and includes a new, expanded section on non-motorized transportation elements. Additionally, KATS' MTP includes a robust consultation list with over 122 distinct organizations consulted for the 2050 MTP.

In addition, KATS has developed a Draft Complete Streets Implementation Plan which utilizes the non-motorized user and sidewalk inventory the MPO has been working to collect over the past few years. The Complete Streets plan will work to enhance the project selection process and ensure best practices in complete streets transportation planning are prioritized throughout the region.

As outlined in the [Joint FHWA and FTA Planning Emphasis Areas](#) (2021) Complete Streets networks should prioritize safety, comfort, and access to destinations for people who use the street network, including pedestrians, bicyclists, transit riders, micro-mobility users, freight delivery services, and motorists. To be considered complete, roads should include safe pedestrian facilities, safe transit stops (if present), and safe crossing opportunities on an interval necessary for accessing destinations.

This Complete Streets Plan builds off the KATS Complete Streets Policy approved September 2014. The MPO has coordinated a subcommittee that meets quarterly and charged with developing the plan. The KATS FY2024 UPWP anticipates a completion date in the spring of 2024.



### 4.4.3 Findings

#### Commendation:

Commendation 2: The Federal Team commends KATS on their work to expand equity and safety through the development of the Complete Streets Implementation Plan. KATS' approach to collect and incorporate non-motorized data into the transportation planning process, including project selection, is a best practice and aligns with the FTA and FHWA Planning Emphasis Area topic of Complete Streets.

#### Recommendation:

Recommendation 5: KATS currently uses generic forecasting methods for revenues adopted by the Michigan Transportation Planning Association (MTPA) and other MPOs in Michigan. While adequate, it does not consider local conditions or other potential drivers of cost. This methodology currently assumes a 2% average growth in costs over a 20-year horizon. Since 2021, however, inflation has been, and is anticipated to remain, well over 2%. We therefore recommend that KATS, in conjunction with MDOT and MTPA, reexamine this assumption to determine if a higher growth in costs is warranted (such as 3% or 4%).

#### Proposed FHWA/FTA Technical Assistance:

Work with MTPA finance committee and MDOT staff to develop a strategy for pursuing innovative financing methods within the State of Michigan.

## 4.5 Performance-Based Planning and Programming

### 4.5.1 Regulatory Basis

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



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

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

It is anticipated that there will be a sixth performance area, Emissions – Greenhouse Gas Emissions, although there has not been a final rule made on this topic and it was not considered as part of this Certification Review.

#### **4.5.2 Current Status**

Currently, KATS adopts the state targets for the federally required performance measures of Safety, Transit, Pavement and Bridge Condition, and System Performance and reports the data through the [Systems Performance Report](#). This practice is common throughout the state, with nearly all MPOs in Michigan adopting state targets. These state targets, however, are developed through a collaborative process with all MPOs in the state (represented in the MTPA body), with MPOs providing significant feedback on all state targets.

KATS's system performance report is updated each time a new performance measure is updated and when a new annual listing of obligated projects is completed. This effort works to ensure that the report remains current, and illustrates the connection between projects, project selection, and performance measures.

Through the discussion at the on-site, KATS staff noted difficulty in finding state-wide current and historic performance measure data. Additional discussion of the transit performance measures is included in Section 4.1 Transit Planning.

#### **4.5.3 Findings**

##### **Recommendations:**

Recommendation 6: MDOT should consider additional coordination with the MPOs, including KATS, to ensure the specific written provisions for performance measure coordination under [23 CFR 450.314\(h\)](#) are up to date. To best support statewide



Transportation Performance Measure requirements, a best practice for MDOT to consider is creating a web-based dashboard showing performance measure trends that makes data visible, accessible, and easily understandable to all.

### **FHWA/FTA Resources:**

- FHWA's [State Performance Dashboards](#)
  - Alaska: <https://dot.alaska.gov/performance-dash/>
  - Colorado: <https://www.codot.gov/performance>
  - Connecticut: <https://portal.ct.gov/DOT/Performance-Measures/Performance-Measures>
  - Delaware: <https://deldot.gov/dashboard/index.shtml?dc=transit>
  - Idaho: <https://apps.itd.idaho.gov/apps/dashboard/>
  - Iowa: <https://iowadot.gov/performance>
  - Kansas: <https://ksdotperformance.ksdot.gov/>
  - Michigan: [Michigan Transportation Asset Management Council Reporting Dashboard.](#)
  - Minnesota: <https://www.dot.state.mn.us/measures/>
  - North Carolina: <https://www.ncdot.gov/about-us/our-mission/Performance/Pages/default.aspx>
  - North Dakota: <https://www.dot.nd.gov/dotnet2/view/dotdashboard.aspx>
  - Texas: <https://www.txdot.gov/data-maps/performance-dashboard.html>
  - Virginia: <https://dashboard.virginiadot.org/>
- Washington State DOT has a noteworthy practice of interagency communication with their TPM folios: [Transportation Performance Management reports | WSDOT \(wa.gov\)](#)

#### MPO examples

- [Maricopa - Case Studies - Performance Based Planning - Planning - FHWA \(dot.gov\)](#)
- [MPO Example – Wasatch Front Regional Council's \(WFRC\) System Performance Report from their 2023-2050 Regional Transportation Plan](#)

#### FHWA / FTA

- [https://www.fhwa.dot.gov/planning/performance\\_based\\_planning/](https://www.fhwa.dot.gov/planning/performance_based_planning/)
- [FHWA/FTA Model Long-Range Transportation Plans: A Guide for Incorporating Performance-Based Planning \(refer to Element 4\)](#)
- <https://www.transit.dot.gov/regulations-and-guidance/transportation-planning/performance-based-planning-and-programming>

## **4.6 Civil Rights (Title VI, EJ, LEP, ADA)**

### **4.6.1 Regulatory Basis**

Title VI of the Civil Rights Act of 1964, prohibits discrimination based on race, color, or national origin. Specifically, 42 U.S.C. § 2000(d) states that “No person in the United States shall, on the



ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance". Additionally, there are other statutes that provide legal protection against discrimination such as: the Federal Aid Highway Act of 1973 (23 U.S.C. § 324), the Age Discrimination Act of 1975, the Rehabilitation Act of 1973 (29 U.S.C. §794) (Section 504), and the Americans with Disabilities Act (ADA) of 1990. The ADA specifies that all programs, services, and activities undertaken by public entities regardless of the source of the funding, are prohibited from discrimination based solely on an individual's disability.

Executive Order (EO) 12898 (Environmental Justice) directs federal agencies to develop strategies to address disproportionately high and adverse human, health, or environmental effects of their programs on minority and low-income populations (EJ populations). USDOT and FHWA issued orders to establish policies and procedures for addressing environmental justice in minority and low-income populations to comply with this EO. Federal planning regulations in 23 C.F.R. §450.316(a)(1)(vii), require that the needs of those "traditionally underserved" by existing transportation systems, such as low-income and/or minority households, be sought out and considered. FTA Circular 4703.1 provides guidance to FTA grant recipients on how to fully engage environmental justice populations in the public transportation decision-making process and how to measure, minimize, or mitigate potential impacts on EJ populations.

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

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

#### **4.6.2 Current Status**

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

The KATS Title VI Non-Discrimination Plan is available on the home page of the KATS website. This makes it readily accessible for members of the public to locate and review the KATS's Title VI Non-Discrimination Plan, identify the KATS's point of contact for discrimination concerns, and review the complaint form and process.

The current Title VI complaint form has been updated from a non-fillable form in the appendix of the KATS Title VI Plan to a standalone, fillable PDF document found on the Title VI page of KATS's website. Upon the recommendation from the Federal Team during the on-site, KATS





made its Title VI Complaint Form easily accessible and fillable on its website. The form was made readily available in both English and Spanish. This improvement makes it more convenient for members of the public to access and improve the transparency of KATS's Title VI Program.

Upon learning that the current Title VI complaint procedures did not align with official guidance issued by the Federal Highway Administration's Headquarter Office of Civil Rights (HCR), MDOT and KATS began the process to revise their procedures to align with Title VI Complaint guidance issued by HCR. MDOT is actively working to assist KATS, and the other MPOs statewide, with revisions. More specifically, MDOT has created a flowchart to better illustrate the Title VI complaint process and the oversight hierarchy. MDOT plans to share this information and provide guidance to other MPOs through the Michigan Transportation Planning Association (MTPA) group.

#### *Executive Order (EO) 13166 (Limited English Proficiency)*

The current KATS LEP Plan lays out the four factor criteria it uses to determine the appropriate language assistance needs of its planning area, identifies how it will provide notice to LEP persons, and its continued monitoring and commitment to updating its LEP Plan based on census data and Environmental Justice analysis done as a part of the MTP or TIP. KATS is committed to revising its LEP Plan as needed based on census updates, but at a minimum every four years prior to the development of the MTP. Currently, the LEP plan is not publicly accessible on the MPO website.

#### *Americans with Disabilities Act of 1990 Requirements (ADA)*

The KATS Accessibility Notice is posted on the home page of the KATS website along with the ADA Complaint Form. Both the notice and the complaint form identify the KATS's point of contact for ADA.

KATS's Public Participation Plan references meetings held at sites complying with the ADA. KATS's Accessibility Notice found on its website references the availability of accommodations upon request to persons with disabilities who require alternately formatted materials or auxiliary aids to ensure effective communication and access to public meetings or programs. There is no reference to specific accommodations that can be made for residents that may require additional accommodations such as plain text, large print, braille, Communication Assisted Real Time Translation (CART), and assisted listening devices. Including additional information related to ADA and accessibility will help to reduce barriers that disabled residents might face in participating in the transportation planning process.



### 4.6.3 Findings

#### Recommendations:

Recommendation 7: The Federal Team recommends making the KATS LEP Plan available to and easily attainable by the public on the MPO website.

Recommendation 8: The Federal Team recommends MDOT and KATS continue to review its Title VI Complaint procedures and Title VI Complaint form to ensure the laws, regulations, and guidance that govern administrative complaints under Title VI are accurate. The form should be fillable online, and complaints must go to MDOT for investigation instead of the MPO. Additionally, it is recommended that MDOT shares the Title VI complaint process and the oversight hierarchy flowchart created with KATS and all other MPOs. This will provide a clearer process for handling Title VI complaints and can easily be incorporated into MPO's next Title VI Implementation Plan update.

Recommendation 9: The Federal Team recommends the KATS review its ADA Complaint Form to ensure rapid and up-to-date complaint procedures. The ADA Complaint Form should be easily accessible online, fillable, and easy to submit to the KATS's ADA point of contact.

#### Proposed FHWA/FTA Technical Assistance:

- [FHWA - Q & A for Complaints Alleging Violations of Title VI of the Civil Rights Act of 1964](#)
- [Nondiscrimination on the Basis of Disability in State and Local Government Services](#)

## 4.7 Freight Planning

### 4.7.1 Regulatory Basis

The MAP-21 established in 23 U.S.C. 167 is a policy to improve the condition and performance of the national freight network and achieve goals related to economic competitiveness and efficiency; congestion; productivity; safety, security, and resilience of freight movement; infrastructure condition; use of advanced technology; performance, innovation, competition, and accountability, while reducing environmental impacts.

In addition, 23 U.S.C. 134 and 23 CFR 450.306 specifically identify the need to address freight movement as part of the metropolitan transportation planning process.



## 4.7.2 Current Status

A recommendation of the 2020 certification review was for KATS to make the freight planning section of the MTP more robust, given the importance of freight movement to the region. Kalamazoo County is the ninth highest county in Michigan for originating freight movements within the state, and the I-94 corridor that runs through Kalamazoo County carries over 100 million tons of freight annually. KATS staff acted on this recommendation, and in their 2050 MTP, KATS developed a section on freight transportation within the 'existing conditions' section of the plan. In this section they incorporate data from MDOT's freight office and the Upjohn Institute's REMI (Regional Economic Model Incorporated) model to discuss datapoints and the implications that they might have for the MPOs long-range planning efforts.

KATS also adopts MDOT's performance measures for freight and incorporates a freight transportation benefit in their project selection criteria.

## 4.7.3 Findings

There are no findings on the topic of Freight.

# 4.8 Travel Demand Forecasting

## 4.8.1 Regulatory Basis

23 CFR 450.324(f)(1) requires that the Metropolitan Transportation Plan include the projected transportation demand of persons and goods in the Metropolitan Planning Area over the period of the transportation plan. Travel demand forecasting models are used in the planning process to identify deficiencies in future year transportation systems and evaluate the impacts of alternative transportation investments. In air quality non-attainment and maintenance areas, they are also used to estimate regional vehicle activity for use in mobile source emission models that support air quality conformity determinations.

## 4.8.2 Current Status

During the on-site review, there was discussion regarding MPOs facing challenges maintaining travel demand models. More specifically, the need for contracted labor to keep the model up to date places a significant financial and staffing burden on the MPO and limits their ability to focus on other important planning activities. Through the conversation, it was expressed that this is becoming an increasingly common challenge for MPOs in Michigan. MDOT's Urban Travel Demand staff shared their perspectives on the topic as well. FHWA Division staff will assist MPO and MDOT staff in addressing this problem, which is encapsulated in the recommendation below.



**Recommendations:**

Recommendation 10: KATS, along with other MPOs in the state, have expressed concerns with the increasing financial burden of contracting labor for maintaining and updating their travel demand model. The federal review team recommends working with MTPA, FHWA, and MDOT to explore options for maintaining and updating Travel Demand Models.

**Proposed FHWA/FTA Technical Assistance:**

Review and provide best practices for travel demand models from other states and regions, as well as liaise with MDOT and other MPOs in the state to develop possible cost saving measures.



## 5.0 CONCLUSION

FHWA and FTA determined that the metropolitan transportation planning process conducted in the Kalamazoo metropolitan area meets Federal planning requirements.



## APPENDIX A - PARTICIPANTS

The following individuals were involved in the Kalamazoo urbanized area on-site review:

- Andrew Sibold, FHWA Michigan Division
- Christina Nicholaides, FHWA Michigan Division
- Jenny Staroska, FHWA Michigan Division
- PaHoua Shroeder, FHWA Michigan Division
- Tom Fisher, FHWA Michigan Division
- Kathleen Russell, FTA Region 5
- Evan Gross, FTA Region 5
- Steve Stepek, KATS MPO
- Megan Mickelson, KATS MPO
- Sean McBride, Kalamazoo Metro
- Greg Vlietstra, Kalamazoo Metro
- Heather Bowden, MDOT
- Don Mayle, MDOT
- Ryan Gladding, MDOT
- Robert Maffeo, MDOT
- Kathryn Beck, MDOT
- Jeff Franklin, MDOT



## APPENDIX B - STATUS OF FINDINGS FROM 2020 REVIEW

This section identifies the corrective actions and recommendations from the previous certification and summarizes discussions of how they have been addressed.

**Commendation 1: Public Private Partnership – Youth Mobility Bus Pass Program:** *...successful public/private partnership between Metro and City of Kalamazoo Foundation for Excellence. The Foundation. In 2018, the Foundation approached Metro with the idea to fund youth mobility in the City of Kalamazoo. The goal of the Youth Mobility Fund is to remove transportation as a barrier for students who wish to pursue extracurricular activities like participating in sports, theatre, study groups, or any of the opportunities that exist for young people in Kalamazoo. The program will be especially valuable for students whose parents don't have the ability to drive them to or from programs because of work schedules or other commitments. This came through two pilot programs: MyCITY and the Kalamazoo Public Schools.*

*KRESA MyCITY Pilot Program and Kalamazoo Public Schools Pilot Program*

**Commendation 2: TIP Public Involvement and Online Tools:** *KATS is commended for using an informative, concise method to communicate TIP changes to both committees and the general public. Graphics containing basic information: on TIP processes, fiscal constraint, the MPO, and projects; readily convey critical information. This encourages public involvement and is a best practice. A copy of this document will be included in Appendix F of the report.*

**Commendation 3: PPP Performance Measures:** *KATS is commended for using custom performance measures to determine the success of the Public Participation Plan. Tracking and reporting on these measures exceeds the responsibility of the MPO and should be considered a best practice.*

**Recommendation 1: Use of Cash vs. In-Kind Match:** *KATS should review use of in-kind match as a method of meeting match requirements for federal planning funds. With increased responsibilities of transportation planning in a TMA, KATS will need to explore ways of increasing MPO funding.*

*MPO Response:*

KATS continues to discuss the use of a cash match for the planning program. A group of our Policy Committee has started to review other MPO dues structures.

**Recommendation 2: Freight Planning:** *KATS should strive to make the freight component of the MTP more prominent. Increasing the prominence of freight components is crucial due to the heaviest travelled freight corridor in the state passing through the MPO.*

*MPO Response:*

Accommodating freight services is part of the MPO's goal to increase the accessibility, reliability, and mobility of the system. KATS recognizes the importance of freight services as an intermodal connection that facilitates the movement of goods between modes of transportation. Freight is a component of the MTP Project Ranking Process as part of complete streets and intermodal connectivity.

**Recommendation 3: MDOT Project Selection Transparency:** *It is recommended the MDOT Region Planning staff and MPO work cooperatively to develop a project list beyond the MDOT 5-year program.*



*Examples could include significant operational or anticipated resurfacing and rehabilitation projects as identified through Asset Management programs.*

*MPO Response:*

N/A

**Recommendation 4: Environmental Justice Outreach:** *KATS staff should develop an additional section in the PPP to address outreach activities to minority and low-income populations. Underserved populations typically require non-traditional outreach methods. KATS needs to plan and record results for outreach where projects have been identified in EJ areas.*

*MPO Response:*

KATS PPP has outlined specific strategies to more effectively and proactively engage in identified EJ areas. Forming partnerships with other organizations that support underserved populations is the first step in understanding how KATS can best communicate and participate with the community. KATS offers various methods for recording outreach results from traditional methods like letters and emails to newer methods such as social media analytics.

**Recommendation 5: Freight Shipper Participation:** *Inclusion of “shippers of freight” in the PPP is required under 23 CFR 450.316. KATS does include a list of local freight shippers in the appendix of the PPP, however this effort needs to expand and the comments received from freight companies should be recorded in major planning documents. Specific outreach strategies may need to be developed to receive meaningful feedback.*

*MPO Response:*

KATS continues to look for opportunities to include local freight shippers within the planning process. KATS has given a few presentations to local manufacturers and continues to grow a relationship with our local economic development agency (Southwest Michigan First).

**Recommendation 6: Update Title VI and ADA Plan:** *KATS Title VI Plan has not been updated since 2011. MPO staff should reach out to MDOT’s Title VI coordinator to update their plan. The MPO may want to consider separating the Limited English Proficiency (LEP) and Title VI Plans for updating purposes. The new plan(s) will need to be posted on the KATS website. Staff indicated there is no current process for tracking or addressing ADA complaints. KATS should have a documented procedure for recording and resolving complaints.*

*MPO Response:*

KATS solicited comments from MDOT’s Title VI Coordinator for an update to their Title VI Plan in late 2019. The plan was also out for public comment for over a month. KATS updated Title VI Plan was approved by the Policy Committee on February 19, 2020. Another update to the KATS Title VI Plan began in July 2023 and is currently underway. Following a period of public comment and review by MDOT’s Title VI Coordinator, approval of the plan is anticipated in fall 2023. This update includes an additional ADA complaint form. KATS also added language to our accessibility notice, directing any ADA complaints to contact the Executive Director, who will document and respond.





U.S. Department of Transportation  
Federal Highway Administration  
Federal Transit Administration



## **APPENDIX C – PUBLIC COMMENTS**

No public comments were received. Opportunities for public involvement were solicited during KATS' technical committee meeting on October 12, 2023, at 9:30am. This meeting was held at Metro facilities at 530 N. Rose Street, Kalamazoo, MI.

Written public comments were solicited from September 26, 2023 until October 27, 2023. The notice was advertised on the MPO social media accounts and sent by email to their contacts list. No public comments were received.



## APPENDIX D - LIST OF ACRONYMS

**ADA:** Americans with Disabilities Act  
**BIL:** Bipartisan Infrastructure Law  
**CAA:** Clean Air Act  
**CAC:** Citizen Advisory Committee  
**CFR:** Code of Federal Regulations  
**CMP:** Congestion Management Process  
**CO:** Carbon Monoxide  
**COA:** Comprehensive Operational Analysis (Transit)  
**DOT:** Department of Transportation  
**EJ:** Environmental Justice  
**FAST:** Fixing America's Surface Transportation Act  
**FHWA:** Federal Highway Administration  
**FTA:** Federal Transit Administration  
**FY:** Fiscal Year  
**HSIP:** Highway Safety Improvement Program  
**ITS:** Intelligent Transportation Systems  
**IJA:** Infrastructure Investment and Jobs Act (see BIL)  
**KATS:** Kalamazoo Area Transportation Study  
**LEP:** Limited-English-Proficiency  
**MAP-21:** Moving Ahead for Progress in the 21<sup>st</sup> Century  
**MDOT:** Michigan Department of Transportation  
**MPA:** Metropolitan Planning Area  
**MPO:** Metropolitan Planning Organization  
**MTP:** Metropolitan Transportation Plan  
**MTPA:** Michigan Transportation Planning Association  
**NAAQS:** National Ambient Air Quality Standards  
**NO<sub>2</sub>:** Nitrogen Dioxide  
**O<sub>3</sub>:** Ozone  
**PBPP:** Performance Based Planning and Programming  
**PPP:** Public Participation Plan  
**PTASP:** Public Transportation Agency Safety Plan  
**PM<sub>10</sub> and PM<sub>2.5</sub>:** Particulate Matter  
**SHSP:** Strategic Highway Safety Plan  
**STIP:** State Transportation Improvement Program  
**TAM:** Transit Asset Management  
**TDM:** Travel Demand Management  
**TIP:** Transportation Improvement Program  
**TMA:** Transportation Management Area  
**U.S.C.:** United States Code  
**UPWP:** Unified Planning Work Program  
**USDOT:** United States Department of Transportation



**VPI:** Virtual Public Involvement

**WMU:** Western Michigan University



## APPENDIX E – Recommended Environmental Justice and Performance Measure Strategies

Planning regulations at 23 CFR 450.316 require an MPO's Public Participation Plan (PPP) to, at a minimum, describe explicit procedures, strategies, and desired outcomes for seeking out and considering the needs of those traditionally underserved by existing transportation systems.

The following recommendations pertain to the Federal Team's review of the Draft 2023 PPP document that was published during the Certification Review and currently posted on the KATS MPO website [here](#).

These recommendations should be considered for explicitly addressing EJ strategies in the 2023 PPP. We have also included links to further resources to assist KATS to improve public engagement in this area.

Environmental Justice Strategies page 11:

- Where Appendix F is referenced, we suggest providing detail on how it is kept updated. For example: “MPO staff ensure that the organization list is up to date by maintaining a database of contacts from MPO activities and engagements” *and/or* “MPO staff will annually review the list and conduct research on possible additions and removals of inactive/outdated information.”
- Suggest including possible examples on what “forming partnerships with other organizations” looks like. For example: “For each organization listed in the Appendix related to Environmental Justice work, MPO staff will regularly reach out to solicit opportunities for partnership and relationship-building such as setting up project-based outreach groups, developing a two-way communication plan on relevant issues, setting up new cultural education initiatives, sharing contact lists, soliciting volunteers to serve on MPO committees/subcommittees as community representatives, providing assistance preparing events and community meetings, and providing relevant technical assistance and mapping information for topics of interests to the organization.”
- We would like to see the PPP incorporate at least some of the following “non-traditional” outreach strategies from the USDOT Promising Practices Guide (link below) such as:
  - Implementing regular Staff and Board training on Environmental Justice community engagement methods, diversity and inclusion
  - Coordinating community meetings and town halls with elected officials representing EJ-communities
  - Dedicating staff or staff time for EJ-outreach and building the capacity of EJ-focused community organizations and advocacy groups



- Utilizing Focus groups/Ad-hoc groups, volunteer programs, internships that proactively involve EJ community members, and outreach coordinators who reflect the diversity of the community
- Hosting educational events, site visits, neighborhood walks/ride events, and surveys on the ground in EJ communities
- Utilizing alternative media, such as neighborhood/homeowners association newsletters, student newspapers, and local non-English media outlets to disseminate information
- Attending non-traditional events and providing MPO updates and providing ways for the public to provide comments at those events. “By going to where people congregate in large numbers, an organization leverages access to a pre-existing audience and has an opportunity to engage a wide range of people.”

- References:

[Promising Practices for Meaningful Public Involvement](#),

[Inclusive Public Participation in Transit Decision-Making](#)

[Public Involvement Techniques for Transportation Decisionmaking](#)

[Practical Approaches for Involving Traditionally Underserved Populations in Transportation Decisionmaking](#)

Performance Measures pages 20-24:

- Some of the “Suggested performance goals” (green box) have specific target figures, but others do not and are not differentiated from the “Evaluation Criteria” (blue box). This makes it difficult to publish standardized evaluation reports that effectively track progress. We recommend standardizing a Goal/Measure/Target or a Goal/Objective/Action structure. For example:
  - Goal “Increase outreach and productive interactions with EJ Populations”
    - Performance Measure 1: “Number of meetings/events held in EJ communities”



- Target 1: “MPO will host at least [4] public events in the area EJ communities identified per year, at varied times, locations, and forums”
- Performance Measure 2: “Number of EJ community members involved in MPO committees, subcommittees, focus groups”
  - Target 2: “MPO will increase the number of EJ-community representatives actively involved in the MPO structure by [20%] by 2025”
- Performance Measure 3: “MPO interactions with EJ community organizations and advocacy groups”
  - Target 3: “MPO will be present in at least [6] area EJ community meetings per year to inform participants of MPO activities and functions”

- Ref. [Measuring the Effectiveness of Public Involvement in Transportation Planning and Project Development](#)

Appendix F Page 35:

- Please build out the list of “Stakeholder Organizations Representing Minority Populations” and other lists to include specific neighborhood associations that represent your local EJ communities, and other minority-focused or community advocacy groups

Possible examples include:

- [ISAAC](#)
- [Northside Ministerial Alliance](#)
- [Western Michigan University Student Groups](#) (ie. APASA, Black Student Union, International Student Council, Latino Student Alliance)
- [Kalamazoo Climate Crisis Coalition](#)
- [Edison Neighborhood Association](#)
- [Black Arts and Cultural Center](#)
- [Northside Association for Community Development](#)
- [El Concilio Kalamazoo](#)
- [Chinese American Association of Greater Kalamazoo](#)



- o [Society for History and Racial Equity \(SHARE\)](#)
- o [Kalamazoo Valley Community College](#)







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