



U.S. Department
of Transportation

**Federal Highway
Administration**

**Federal Highway
Administration**

**Federal Transit
Administration**

Transportation Management Area Planning Certification Review

Chattanooga - Hamilton County /
North Georgia
Transportation Planning Organization

July 2017

FINAL REPORT



Table of Contents

1.0	Executive Summary.....	1
1.1	Previous Findings and Status	1
1.2	Summary of Current Findings	1
2.0	Introduction.....	4
3.0	Scope and Methodology.....	6
4.0	Program Review	7
4.1	Progress in Addressing Findings from the 2013 Certification Review.....	7
4.2	Status and Findings	7
4.3	TPO MPA Boundaries, Structure, and Agreements	8
4.4	Planning Products – Unified Planning Work Program, Metropolitan Transportation Plan, and Transportation Improvement Program.....	11
4.5	Performance-based Planning and Programming	18
4.6	Public Involvement and Title VI Compliance	19
4.7	Congestion Management Process and ITS.....	22
4.8	Air Quality	24
4.9	Transit.....	25
5.0	Conclusion.....	27
	Appendix A – Summary of findings & status from 2013 TMA Certification Review	28
	Appendix B – Site Visit Participants	35
	Appendix C – Certification Review Agenda.....	36
	Appendix D - Comments Received and Responses	38

1.0 Executive Summary

On April 25-27, 2017, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted a Transportation Management Area (TMA) Certification Review of the Chattanooga-Hamilton County / North Georgia Transportation Planning Organization (TPO). FHWA and FTA (the Review Team) must conduct review of the transportation planning process in urban areas with population greater than 200,000 people no less than once every four years to ensure compliance with applicable federal rules and regulations. The Review Team may note three actions for each part of the process reviewed: noteworthy practices (commendations), procedures to improve planning practices (recommendations) or failures to meet regulatory requirements (corrective actions).

The TPO's planning process meets the requirements of 23 CFR 450. FHWA and FTA jointly certify the TPO's planning process with full certification with no corrective actions.

1.1 Previous Findings and Status

The prior Certification Review in 2013 identified 1 corrective action, 13 recommendations, and 10 commendations. Appendix A includes a summary of all the findings and status from the 2013 review. To address the corrective action, the TPO partnered with the Chattanooga Area Regional Transportation Authority (CARTA) to develop and execute on June 17, 2014 a joint Memorandum of Agreement (MOA) for Transit Planning Coordination and Cooperation.

1.2 Summary of Current Findings

The 2017 Federal Certification Review finds that the Chattanooga-Hamilton County / North Georgia metropolitan transportation planning process meets federal planning requirements. There are no corrective actions for the 2017 Federal Certification Review. As such, the Review Team certifies the transportation planning process for the TPO, the Tennessee Department of Transportation, the Georgia Department of Transportation, and public transportation operators in the region.

The Federal Review Team identified several notable planning practices and accomplishments by the TPO since the last certification review. This report documents the certification review process and highlights 7 commendations (Table 1) and 7 recommendations (Table 2) to strengthen the overall planning process.

Table 1. 2017 Federal Certification Review Commendations

Review Area	Commendation
Unified Planning Work Program (UPWP)	<p>The TPO uses a five-year forecast to map UPWP activities and establish a planned monetary spread for reasonably available financial resources to address the known cycle of required planning products or special studies. This practice is an essential reflection of a well-structured planning program that accounts for product deadlines and distributes funding sources appropriately over a more meaningful planning horizon. The TPO intends to create a visual illustration of this process to better document.</p>
Metropolitan Transportation Plan (MTP)	<p>The TPO uses a data-driven, analytical process to assess the region’s safety needs and priorities for mitigating strategies and projects. This analysis approach enables the TPO to make informed decisions on future investment priorities that may contribute to meaningful reductions in crashes and fatalities.</p>
	<p>The TPO engages in a coordinated process with local jurisdictions and the public to effectively connect land use and transportation planning as part of their long-range planning activities. The TPO, working closely with other members of the Chattanooga – Hamilton County Regional Planning Agency (RPA), is following a process to create land use plans for communities that address local goals and are informed by multimodal transportation considerations. The TPO also has developed educational materials and tools for local developers to use early in development projects to prevent future transportation infrastructure challenges.</p>
Performance-based Planning and Programming	<p>The TPO uses the community-informed performance categories, goals, and objectives summarized in the Framework across planning products. This approach is a best practice which enhances the consistency of project prioritization and selection across planning products and promotes the advancement of top-performing projects.</p>
Public Involvement	<p>The TPO conducts routine and consistent assessment of their public involvement effectiveness using a variety of techniques. The mix of traditional assessment techniques, such as meeting cards, and technological assessment techniques, such as Google Analytics, provides the TPO with views from a broad cross-section of public and across multiple outreach mediums. The TPO also routinely solicits feedback from their Executive Board, TCC, and CACs on outreach approaches and meeting management. The regularity with which the TPO conducts these assessments has contributed to the creation of a strong baseline and body of data for the identification of process improvement.</p>

Transit	The TPO has taken a leadership role in maintaining frequent, open communication between area transit and service providers. In particular, the Review Team recognizes the TPO’s initiation of their region’s Coordinated Plan Symposium. This effort brings together transit and service providers to share information, educate one another on on-going activities, and improve coordination of processes, plans, and services.
	CARTA maintains effective, quality transit services and planning for services for the disabled and continues to emphasize services for transit-dependent populations. Their emphasis ensure that those most vulnerable and at-need populations can continue to access jobs, schools, retail, and essential services. This effort is an embodiment of the US Department of Transportation (DOT)’s initiatives to connect communities and assist individuals in improving the quality of their lives.

Table 2. 2017 Federal Certification Review Recommendations

Review Area	Recommendation
TPO Metropolitan Planning Area (MPA) Boundaries, Structure, and Agreements	The Review Team suggests the TPO incorporate more frequent and detailed project status briefings at Executive Board and TCC meetings in the future to enhance awareness of current project statuses. This recommendation could be addressed by including a standing project report agenda item for Tennessee DOT (TDOT) and Georgia DOT (GDOT).
	The 2007 MOA between TDOT and GDOT Relative to MPO Transportation Planning for the Chattanooga Metropolitan Planning Organization is dated. The Review Team recommends that the TPO update its contents to reflect the following: <ul style="list-style-type: none"> ▪ TIP staffing roles and responsibilities ▪ Air Quality roles and responsibilities ▪ Underrepresented stakeholder groups and advisory committees
Metropolitan Transportation Plan (MTP)	The Review Team recommends the TPO develop a formal, documented process to manage amendments to the RTP and establish thresholds of changes that may be processed as administrative adjustments. This approach will allow the TPO to focus formal amendments, and their associated public involvement, on changes that are of the greatest interest to the public and to streamline RTP maintenance.
Performance-based Planning and	The Review Team recommends TDOT present to the TPO Executive Board

Programming	an overview of the State’s overall performance measure target setting approach and a summary of the State’s targets for the Safety Performance Measures and all upcoming Performance Measures.
Public Involvement	The Review Team recommends the TPO incorporate into their current assessment of their website compliance with Section 508 of the Rehabilitation Act of 1973, as amended in 1998, and include any identified necessary changes to make their electronic information fully accessible for people with disabilities. This could include measure such as allowing adjustment to font sizes or incorporating speech services for the visually impaired.
Congestion Management Process (CMP)	The Review Team recommends the TPO incorporate analytical methodologies into the CMP to assess the performance of projects derived from the CMP in reducing congestion. The update to the CMP could include targets for performance and a process to evaluate projects after implementation for their ability to achieve those targets. The results of this assessment should be used to inform the prioritization and selection of future projects from the CMP.
Air Quality	The Review Team recommends TDOT revisit their statewide process for soliciting applications for CMAQ funds to ensure coordination occurs with the TPO early in the application process. The TPO can serve a valuable function in providing guidance to member jurisdictions on eligible project types and to ensure projects are screened appropriately through the TPO’s project prioritization and selection process to achieve consistent regional goals and visions.

Air Quality	The Review Team recommends TDOT revisit their statewide process for soliciting applications for CMAQ funds to ensure coordination occurs with the TPO early in the application process. The TPO can serve a valuable function in providing guidance to member jurisdictions on eligible project types and to ensure projects are screened appropriately through the TPO’s project prioritization and selection process to achieve consistent regional goals and visions.
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2.0 Introduction

Pursuant to 23 USC 134(k)(5) and 49 USC 5303(k)(5), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan

transportation planning process in urban areas with population above 200,000 people, known as Transportation Management Areas (TMAs), at least every four years. The TMA Certification Review includes an assessment of the degree to which the transportation planning process in each in each TMA meets the requirements of the metropolitan planning regulations. As the metropolitan planning process is a cooperative process, the metropolitan planning organization (MPO), state Departments of Transportation (DOTs), and partner agencies are included in the assessment.

Upon completion of each Certification Review, FHWA and FTA (the Review Team) can take one of three Federal actions:

1. Full Certification- Jointly certify the metropolitan transportation planning process
2. Partial Certification- Jointly certify the metropolitan transportation planning process subject to certain specified corrective actions being takes, or
3. Decertification- Jointly decertify the metropolitan transportation planning process.

The Chattanooga-Hamilton County / North Georgia Transportation Planning Organization (TPO) is the federally designated MPO for the Chattanooga TMA. The Review Team first certified the Chattanooga TMA in July 1996 and most recently in July 2013.

This report represents the 7th Certification Review for the Chattanooga TMA and includes a summary of the Review Team's observations, corrective actions, commendations, and recommendations. The following list describes each component in detail:

- **Observations**- statements of fact that describe the conditions found during the data gathering phases of the Certification review and provide the primary basis for determining corrective actions, recommendation, and commendations.
- **Corrective Actions**- denote items that do not meet the requirements of the applicable Federal rules and regulations. FHWA and FTA expect MPO's to address corrective actions in accordance with prescribed timelines to achieve specific outcomes.
- **Commendations**- highlight noteworthy practices and elements that demonstrate innovative, highly effective, well-thought-out procedures for implementing the planning requirements.
- **Recommendations**- concern the state of practice or technical improvements that would enhance existing processes and procedures. FHWA and FTA expect MPO's to give due consideration to the implementation of recommended actions to enhance metropolitan transportation planning activities.

The Review Team identified no corrective actions for the TPO during this Certification Review period. This report highlights positive practices of the TPO with commendations that can serve as examples to other States and planning organizations. The recommendations in this report reflect national trends and best practices of the FHWA. Action on the recommendations will not affect the status of this Certification Review; however, the Review Team expects the TPO to consider these items in their activities as they will enhance the metropolitan transportation

planning process in the metropolitan planning area. The conclusion of this report provides the final Federal planning certifications determination.

3.0 Scope and Methodology

The TMA Certification Review includes a desk review, a site visit, and a public involvement opportunity.

Review Team Membership

The 2017 Review Team included the following members:

Federal Transit Administration – Region IV Office

Andres Ramirez, General Engineer

Federal Highway Administration – Tennessee Division

Theresa Claxton, Planning and Program Management Team Leader

Joi Hamilton-Jones, Civil Rights Program Specialist

Nicholas Renna, Operations Program Manager

Jessica Rich, Safety Engineer

Sean Santalla, Planning and Air Quality Specialist

Federal Highway Administration – Georgia Division

Andrew Edwards, Planning Team Leader

Federal Highway Administration – Illinois Division

Vontra Giles, Community Planner

Desk Review

In the desk review, the Federal Team examined the TPO's major planning products and support materials to assess compliance with the requirements of 23 CFR 450. The desk review also included a detailed examination of the Chattanooga TMA's response to the findings from the 2013 Federal Certification Review. The Review Team used the results of the desk review to focus discussion at the site visit on areas requiring greater attention or clarification.

Site Visit

During the 2017 Certification Review, the Review Team followed up on outstanding questions from the desk review of the TPO's planning products, explored components of the planning process, and discussed major federal initiatives with TPO staff, the Tennessee Department of Transportation (TDOT), and the Georgia Department of Transportation (GDOT). A list of attendees to the on-site meeting is included in Appendix B. On April 25, 2017, the Review Team held a public meeting to invite public comment and feedback on the TPO's metropolitan transportation planning process. A copy of the agenda for the site visit appears in Appendix C.

A summary of public comments received during the site visit and responses to those comments appears in Appendix D.

4.0 Program Review

The Certification Review focused on key planning products and processes. The Review Team structured discussions during the site visit on the following major areas:

- Status of Prior Review Findings
- TPO Metropolitan Planning Area (MPA) Boundaries, Structure, and Agreements
- Planning Products: Unified Planning Work Program (UPWP), Metropolitan Transportation Plan (MTP) and Transportation Improvement Program (TIP)
- Performance-based Planning and Programming
- Public Involvement and Title VI Compliance
- Congestion Management Process and Intelligent Transportation Systems (ITS)
- Air Quality
- Transit Planning

4.1 Progress in Addressing Findings from the 2013 Certification Review

The prior Certification Review in 2013 identified 1 corrective action, 13 recommendations, and 10 commendations. Appendix A includes a summary of all the findings and status from the 2013 review.

The corrective action from the 2013 Certification Review was to update the 1997 Memorandum of Understanding concerning the continuing, comprehensive, and cooperative transportation planning process by July 16, 2014. To address the corrective action, the TPO partnered with the Chattanooga Area Regional Transportation Authority (CARTA) to develop and execute a joint Memorandum of Agreement (MOA) for Transit Planning Coordination and Cooperation on June 17, 2014. The purpose of the MOA was to establish a written working agreement between the TPO and CARTA to ensure a comprehensive, cooperative, and continuous regional transportation planning process. This MOA includes specific provisions for cooperatively developing and sharing of information related to development of the TPO's Regional Transportation Plan (RTP), the Transportation Improvement Program (TIP), and the Annual Obligated List of Projects.

The TPO successfully completed the 2013 corrective action. The TPO Executive Board approved the MOU and endorsed its incorporation into the TPO's Prospectus on June 17, 2014.

4.2 Status and Findings

The TPO highlighted several notable activities that their organization undertook since the prior Certification Review, which are summarized in Table 3.

Table 3. Notable TPO Activities Since 2013

Date	Activity Summary
2015	TPO administered an FTA required On-Board Transit Survey system- wide. This survey resulted in a database of travel patterns and opinions of CARTA service
January 2015	TPO highlighted in FHWA’s Fostering Livable Communities newsletter for its 2040 Regional Transportation Plan community-scaled performance framework.
May 2015	Governor’s Environmental Stewardship Awards program recognizes exceptional voluntary actions that improve or protect the environment and natural resources.
July 2015	FHWA/FTA/TRB Transportation Planning Excellence Award for the TPO’s performance measure framework in the 2040 RTP.
	TPO hosted Multimodal Transportation Center Study Public Meeting.
October 2016	TPO developed the FY 2017-2020 TIP. FHWA/FTA approved TIP inclusion in STIP in January 2017.
November 2016	TPO held Partners & Leadership Open House for the 2045 RTP.
March 2017	Regional Planning Authority staff held Transportation and Land Use Open House to evaluate and analyze travel demand management strategies.
April 2017	TPO hosts Coordinated Plan Symposium to enhance regional transit and human services coordination.
May 2017	TDOT and Tennessee Department of Environment and Conservation announce 2017 Tennessee Sustainable Transportation Award for TPO GreenTrips Program.

4.3 TPO MPA Boundaries, Structure, and Agreements

4.3.1 Regulatory Basis

- 23 CFR 450.310 TMA structure and representation
- 23 CFR 450.312 MPA Boundaries
- 23 CFR 450.314 Metropolitan planning agreements

4.3.2 Status and Findings – TPO Boundaries

The Chattanooga Urban Area is a bi-state region serving 19 jurisdictions (15 municipalities and four counties). It includes Hamilton County, Tennessee, its municipalities, Catoosa County and the northern portions of Dade and Walker counties in Georgia with their respective municipalities. The Governor of Tennessee last approved the MPA boundary on October 3, 2013 and the Governor of Georgia last approved the MPA boundary on August 14, 2014.

The TPO evaluates MPA boundaries after each decennial census update and upon requests from local municipalities. The Chattanooga-Hamilton County / North Georgia MPA encompasses the entire Chattanooga Urbanized Area (as defined by the Bureau of the Census) and the neighboring area the TPO expects to become urbanized within the 20-year horizon of the 2045 long range transportation plan, the Regional Transportation Plan (RTP).

The TPO considers MPA boundary adjustments in accordance with criteria in 23 CFR 450.312, projected population densities over a 20-year horizon, and the interconnectedness of proposed expansion areas with the existing urbanized area in terms of transportation and commuting patterns. The staff also considers development patterns, input from local partners, and may conduct field research when examining boundary adjustments.

4.3.3 Status and Findings – TPO Structure

The TPO consists of an Executive Board, Technical Coordinating Committee, Staff, and various committees and working groups.

Executive Board

The TPO Executive Board is responsible for establishing policy and adopting transportation plans and programs. The Executive Board provides cooperative decisionmaking for transportation planning in the TPO Planning Area and is responsible for administrative and fiscal control and carrying out the provisions of Federal transportation planning regulations. The Executive Board includes area elected officials and officials of agencies that administer or operate major modes of transportation in the TMA.

Technical Coordinating Committee

The Technical Coordinating Committee (TCC), through policy directions, is responsible for the daily administration of all transportation activities. The TCC receives plans, programs, and transportation documentation for review prior to presentation to the Executive Board for approval.

TPO Staff

The Chattanooga-Hamilton County Regional Planning Agency (RPA) houses the TPO Staff. Organization of the TPO staff as part of the RPA has enabled the TPO to play a key role in enhancing the connections between land use and transportation planning.

Advisory Committees and Groups

The TPO has created several advisory groups, including the TIP Selection Subcommittee, the Consultant Selection Subcommittee, the Georgia Advisory Committee, the Human Services Transportation Committee, the Multimodal Advisory Committee, and Planning for Operations Working Group.

The TPO engages in ad hoc committees to gather input and feedback as necessary, including the GreenTrips Advisory Committee, the Title IV/Environmental Justice Committee, Georgia Advisory Committee, CARTA Advisory Commission for Accessible Transportation, Human Services Transportation Coordination Committee, and the Transportation Club. Additionally, the TPO targets stakeholder groups for Intelligent Transportation Systems (ITS), Transit, Freight, and Greenways.

The TPO routinely assesses the effectiveness of Executive Board and TCC meetings and needs through surveys. The TPO uses the feedback from the Executive Board and the TCC to customize meeting format and content to improve coordination activities and better address Board and Committee needs. This practice is reflected as a commendation in this report in Section 4.6.2 – Public Involvement.

Recommendation

The Review Team suggests the TPO incorporate more frequent and detailed project status briefings at Executive Board and TCC meetings in the future to enhance awareness of current project statuses. This recommendation could be addressed by including a standing project report agenda item for Tennessee DOT (TDOT) and Georgia DOT (GDOT).

4.3.4 Status and Findings – TPO Agreements

The TPO, bi-state partners, and public transportation operators cooperatively determined their mutual responsibilities in carrying out the metropolitan transportation planning process. The following agreements structure the TMA planning practices:

- Transportation Planning Prospectus (2017): outlines TPO and partner roles and responsibilities and TPO organizational structure for the planning process.
- TPO Executive Board By-Laws (2017): outlines TPO Executive Board composition, organization, voting structure, and member responsibilities.
- TPO Technical Coordinating (TCC) Committee By-Laws (2017): outlines TPO TCC composition, organization, and member responsibilities.
- Memorandum of Agreement (MOA) between TDOT and GDOT Relative to MPO Transportation Planning for the Chattanooga Metropolitan Planning Organization (2007): defines TDOT's, GDOT's, and the TPO's roles and responsibilities for the metropolitan area's continuing, cooperative, and comprehensive transportation planning process.
- Memorandum of Understanding (MOU) Relative to the Catoosa County, Georgia Portion of the Dalton-Whitfield County Urbanized Area (2012): outlines the TPO's responsibility to administer the continuing, cooperative, and comprehensive transportation planning process for the portion of the MPA that extends into Catoosa County.
- MOA Relative to the Sequatchie County Portion of the Chattanooga Urbanized Area Boundary (2012): establishes Sequatchie County's responsibility to administer the continuing, cooperative, and comprehensive transportation planning process for the portion of the MPA that extends into Sequatchie County.

- MOA between Cleveland Urban Area MPO and Chattanooga-Hamilton County/North Georgia TPO (2014): establishes cooperative relationship between the organizations regarding Intelligent Transportation Systems planning and architecture.
- MOA for Transit Planning Coordination and Cooperation between the Chattanooga Area Regional Transportation Authority and Chattanooga-Hamilton County/North Georgia TPO (2014): outlines the TPO and CARTA responsibilities for the metropolitan area's continuing, cooperative, and comprehensive transportation planning process.
- MOA Between TDOT and the Chattanooga-Hamilton County/North Georgia TPO Regarding the Definition and Need for Amendments and Administrative Adjustments to the Statewide Transportation Improvement Program (STIP)/Transportation Improvement Program (TIP) (2013): establishes the definition, process, and need for amendments or administrative adjustments to the TPO TIP and the STIP.

Recommendation

The 2007 MOA between TDOT and GDOT Relative to MPO Transportation Planning for the Chattanooga Metropolitan Planning Organization is dated. The Review Team recommends that the TPO update its contents to reflect the following:

- TIP staffing roles and responsibilities
- Air Quality roles and responsibilities
- Underrepresented stakeholder groups and advisory committees

4.4 Planning Products – Unified Planning Work Program, Metropolitan Transportation Plan, and Transportation Improvement Program

4.4.1 Regulatory Basis

23 CFR 450.308	Transportation planning and UPWP funding
23 CFR 450.324	Metropolitan Transportation Plan
23 CFR 450.326	Transportation Improvement Program

4.4.2 Status and Findings – Unified Planning Work Program

On August 18, 2015, the TPO Executive Board adopted the Fiscal Year (FY) 2016-2017 Unified Planning Work Program (UPWP). On June 22, 2016, the TPO Executive Board amended the FY2016-2017 UPWP to update activities for FY2017.

The TPO developed the FY2016-2017 UPWP in cooperation with the bi-state partners and public transportation operators and outlines transportation planning activities for TDOT, GDOT,

and CARTA, and the TPO in Chattanooga metropolitan planning area. The TPO divides the UPWP into seven distinct tasks, which detail specific projects participating agencies will carry out.

The TPO receives FHWA-administered Metropolitan Planning (PL) funds and Statewide Planning and Research (SPR) funds through TDOT, PL funds through GDOT, and FTA-administered Metropolitan Planning (5303) funds. CARTA receives Urbanized Area Formula Grant (5307) funds directly from FTA. For PL activities, the TPO's 20% non-federal match comes from local member jurisdictions. For 5303 and 5307 activities, the 20% non-federal match comes from TDOT (10%) and local member jurisdictions (10%).

To satisfy a recommendation from the 2009 Certification, the TPO has established a clear process and timeline for amending the UPWP. The amendment process begins in February with review of the amendment by the planning partners and TCC and concludes in August with the Executive Board's final review and approval.

While the UPWP officially covers only two years, the TPO previously nested the two-year UPWP within a four-year planning cycle. The TPO now operates on a five-year UPWP planning cycle to coincide with data collection needs, new transportation plans, and updates to other major documents or plans, such as the Regional ITS Architecture and Deployment Plan. The UPWP identifies transportation planning activities to be undertaken for a two-year period and follows the Federal fiscal year from October 1st through September 30th in both Tennessee and Georgia.

Another noteworthy practice that the TPO implemented is the alignment of UPWP activities to support of the TPO's long-range visions and goals. The patterning and structure of common purpose and direction between plans, programs, and UPWP tasks and activities allows clear connection and tracing of implementation and accomplishment of those long-range goals.

Commendation

The TPO uses a five-year forecast to map UPWP activities and establish a planned monetary spread for reasonably available financial resources to address the known cycle of required planning products or special studies. This practice is an essential reflection of a well-structured planning program that accounts for product deadlines and distributes funding sources appropriately over a more meaningful planning horizon. The TPO intends to create a visual illustration of this process to better document.

4.4.3 Status and Findings – Metropolitan Transportation Plan

The TPO Executive Board adopted the 2040 Long-Range Transportation Plan, known as the Regional Transportation Plan (RTP), and the associated Conformity Determination Report on January 7, 2014. FHWA and FTA issued a determination of conformity for the EPA's 1997

annual PM 2.5 standard on March 5, 2014. The Long-Range Transportation Plan covers Hamilton County in Tennessee, and Dade, Catoosa, and Walker Counties in Georgia.

The TPO coordinated the development of the 2040 RTP with TDOT, GDOT, the Southeast Tennessee Rural Planning Organization, Chattanooga-Hamilton County Regional Planning Agency (RPA), Northwest Georgia Regional Commission, and Chattanooga-Hamilton County Air Pollution Control Bureau. The TPO also coordinated with the urban and rural public transportation providers in the Chattanooga Region – CARTA, SETHRA, Dade Transit, Walker County Transit, and Catoosa County Trans-Aid. The TPO engaged the FHWA Tennessee and Georgia Divisions, FTA Region IV, and the Interagency Consultation Committee (IAC), which includes EPA Region IV, Tennessee Department of Environment and Conservation (TDEC), and Georgia Environmental Protection Division.

The TPO also consulted with several State and Federal agencies responsible for environmental protection, land use management, natural resource conservation, and historic preservation for the 2040 RTP. The TPO sought comments and compared available resource plans and maps with planned transportation improvements to assess environmental impacts on natural resources such as wetlands, floodplains, and historic areas. The TPO also overlaid the transportation projects on a map of the Chattanooga region Title VI areas to better distribute resources and funding in a non-discriminatory manner and monitor the impacts to socioeconomic and ethnic minorities.

The 2040 RTP addresses all modes of transportation associated with streets and highways, public transportation, bicycles, pedestrians, railways, airports, and waterways and supports integration among these modes. The 2040 RTP will focus on economic competitiveness, transportation mobility, green infrastructure, public health, and the quality of existing infrastructure. The TPO developed goals to guide the development and implementation of the 2040 RTP:

1. Congestion;
2. System Preservation;
3. Safety and Security;
4. Active Transportation;
5. Transit Alternatives; and
6. Climate Resilience.

The TPO's performance-based planning framework incorporates a scaled "Community to Region" approach that is sensitive to regional, community, and neighborhood needs.

Transportation projects will fall into one of three categories:

- Within Community (Goal: Build and maintain safe and healthy communities)
- Community to Region (Goal: Connect communities in the region by providing multimodal travel options to activity and economic centers)

- Region to Region (Goal: Grow economic opportunity through strategic investment in critical regional infrastructure)

The 2040 RTP outlined specific investment needs and investment solutions:

<i>NEEDS</i>	<i>SOLUTIONS</i>
<i>System Preservation</i>	Call for Projects
<i>Safety and Security</i>	2035 LRTP (projects not submitted)
<i>Congestion Reduction</i>	Congestion Analysis
<i>Multimodal Connections</i>	Public Input
<i>Economic Growth / Freight Movement</i>	Transit Gap Analysis
<i>Environment / Health</i>	2010 Bike and Pedestrian Plan, Bicycle Gap Analysis
<i>Access to Community Resources</i>	Mobility and Livability Corridor Assessment
<i>Systems Operations</i>	ITS Analysis

These needs and solutions included strategies to reduce congestion, promote transportation demand management (TDM), maximize the efficiency and safety of the existing transportation system, link transportation with community health, and balance transportation system management and operations

FHWA and FTA, in partnership with the Transportation Research Board and American Planning Association, recognized the TPO’s 2040 RTP and performance-based planning framework with a Transportation Planning Excellence Award in 2015.

2045 RTP Update

The TPO began development of the 2045 RTP in August 2016. The 2045 RTP builds closely upon the 2040 RTP. It will focus on three goals: 1) Build and maintain safe and healthy communities, 2) Connect communities in the region by providing multimodal travel options to activity and economic centers, 3) Grow economic opportunity through strategic investment in critical regional infrastructure. The TPO will continue to use the “Community to Region” performance-based planning framework to evaluate projects within each category so smaller projects designed to improve access to community resources will not be competing against major regional projects.

Safety Analysis

The first goal of the 2045 RTP focuses on addressing safety and health concerns within the community. The TPO has taken a data-driven approach to assessing the region’s safety needs and priorities for mitigating strategies and projects. Particular emphasis applies to the analysis of bicycle and pedestrian safety.

For the 2045 RTP update, the TPO is building upon the safety analysis developed for the 2040 RTP. The TPO staff reviewed national (American Association of State Highway and Transportation Professionals) and state (Tennessee and Georgia Strategic Highway Safety Plans) safety emphasis areas to develop a list of common, high priority safety

emphasis areas within the Chattanooga area. They next reviewed crash records and incident management reports from within the Chattanooga region to identify the prevalent types and frequencies of crashes within the region. They identified the most common crash types within the region and compared the results of their analysis against the national and state emphasis areas to assess consistency with those priorities. While all safety emphasis areas will be addressed in the 2045 RTP, it will prioritize investment toward the top three emphasis areas for crashes: Roadway Departures, Aggressive Driving, and Intersection Crashes. Targeting investment toward these three priority areas will allow the TPO to make a maximum impact on reducing crashes and fatalities within the region.

The TPOs next step is to develop specific countermeasures to address safety deficiencies within each of the emphasis areas that local project sponsors may choose to incorporate into future projects to reflect the safety priorities and improve project competitiveness in the project screening process.

Connecting Land Use and Transportation Planning

The second and third goals for the 2045 RTP update relate to improving the connection between land use and transportation planning to improve multimodal transportation and economic development. The TPO recognizes that the region must have land use controls to support the RTP vision for the transportation network for an effective transition from planning to implementation. The TPO, in concert with the RPA, began an approach focused on Chattanooga-Hamilton County which it hopes to expand to other interested jurisdictions within the MPA.

To address the vital nexus of land use and transportation planning, the RPA and TPO established a three-step process titled *Growing Forward* to comprehensively understand how the region has changed during the last decade, reestablish the vision and goals for future growth, and ultimately revise land use codes and policies to structure development to meet those goals.

The first step of the process was to update Chattanooga-Hamilton County's long range comprehensive plan, *Renewing Our Vision*. This plan documents the development history of the region and establishes a broad regional vision based on community input. The RPA completed the plan update in 2016.

The RPA/TPO staff is now in the second phase of the process, development of smaller planning area studies, called the *Strategy for Great Places*. In this phase, the county will be broken into 12 smaller planning areas which will each have a plan to implement the vision developed in *Renewing Our Vision*. Each small area plan will include detailed place-based areas with context-specific land use and transportation policies. As part of this effort, TPO staff examined current multimodal travel demands in the context of the city and county's existing land use model and projected growth and development plans. TPO staff identified areas with existing transit services, areas with current transit

potential based on existing land use and density, and areas where existing land use and density make transit potential borderline for success. The result of this analysis was recommendations for development districts that were documented in each small area plan. The success of these plan developments is their context-sensitive approach. The RPA/TPO's approach is to facilitate building community support around the future each community wants to see, not for a single academic or professional planning vision. The RPA/TPO is working closely with local communities to develop plans that support TDM for the specific land use practices each community seeks. Each recommended land use control changes and proposed transportation infrastructure changes must be scaled to the community needs and wants.

The final step in the *Growing Forward* process will be a broad policy and code update. This step will involve a review and inventory of existing land use controls and policies. The RPA/TPO will then make recommendations on updates to those controls and policies to enhance implementation of the public's vision for future growth. Again, the RPA/TPO role is that of a facilitator for this conversation. Ultimately, the public will decide the direction and changes that will be made to further implementation of their vision.

Of final note on the TPO's efforts to connect land use and transportation planning, the TPO recently completed a consultant project to develop a TDM-Land Use Toolkit for Developers. This toolkit aids developers in incorporating TDM strategies into planned developments. The toolkit includes an Excel-based tool that can help developers assess the effectiveness of specific TDM strategies for specific development projects and sites. The goal of the toolkit is to further real-world implementation of community vision for multimodal transportation and economic development and to minimize adverse safety and congestion issues that may result from development projects that are not adequately planned to address transportation infrastructure. Additional information on the toolkit is available online¹.

Commendation

The TPO uses a data-driven, analytical process to assess the region's safety needs and priorities for mitigating strategies and projects. This analysis approach enables the TPO to make informed decisions on future investment priorities that may contribute to meaningful reductions in crashes and fatalities.

¹ The TDM-Land Use Toolkit for Developers is available online at: http://www.chcrpa.org/TPO_reorganized/Plans_and_Programs/Multi-Intermodal_Land_Use_and_TransPlanning/CHCRPA_2045RTP_Developer_Toolkit.pdf.

Commendation

The TPO engages in a coordinated process with local jurisdictions and the public to effectively connect land use and transportation planning as part of their long-range planning activities. The TPO, working closely with other members of the RPA, is following a process to create land use plans for communities that address local goals and are informed by multimodal transportation considerations. The TPO also has developed educational materials and tools for local developers to use early in development projects to prevent future transportation infrastructure challenges.

Recommendation

The Review Team recommends the TPO develop a formal, documented process to manage amendments to the RTP and establish thresholds of changes that may be processed as administrative adjustments. This approach will allow the TPO to focus formal amendments, and their associated public involvement, on changes that are of the greatest interest to the public and to streamline RTP maintenance.

4.4.4 Status and Findings – Transportation Improvement Program

On November 16, 2016, the TPO Executive Board adopted the FY2017-2020 Transportation Improvement Program (TIP). The TIP documents how Federal, State, and local funds will be expended on highway and public transportation improvements and contains all federally funded and regionally significant projects. The TIP includes State and local roadway, bridge, bicycle, pedestrian, safety and transit projects. The TPO coordinated the fiscally constrained, multi-modal TIP through a comprehensive, continuing and cooperative effort with FHWA, FTA, TDOT, GDOT, CHCRPA, CARTA, SETHRA, and Northwest Georgia Regional Commission. FHWA and FTA did not issue a determination of conformity for the TIP as EPA formally removed the region's nonattainment status in the revocation of the 1997 annual PM 2.5 standard.

The TPO used the Participation Plan to guide the development of the FY2017-2020 TIP and give the public and other interested parties opportunities to review and comment on the proposed program of projects throughout the TIP development process. The Participation Plan outlined a public participation process for all citizens, State and local agencies, providers of freight transportation services, representatives of users of pedestrian walkways and bicycle facilities, and disabled persons to have reasonable opportunity to comment on the transportation plan. The TPO collected public feedback using a variety of methods including the TPO's website.

Notable in the TPO's TIP development is their approach to carry forward in the project prioritization and selection process a consistent performance-based planning framework from

the RTP. The use of the same performance-based planning framework enables the TPO to create a clear connection and continuity between long-term goals and objectives and short-term implementation strategies. Also of note in TIP development, the TPO consciously opened up funding in the Surface Transportation Program, now the Surface Transportation Block Grant, for transit projects to address community interests and needs.

4.5 Performance-based Planning and Programming

Performance based planning and programming became a requirement for States, MPOs, transit agencies, and their planning partners as MAP-21 placed a strong emphasis on performance based decision-making in the statewide and metropolitan transportation planning processes. The TPO has experience establishing performance measures in its metropolitan transportation planning process. The MPO first incorporated transportation performance management into the 2035 RTP in 2010. Since then, the TPO has been proactive in enhancing performance-based planning as part of their long-range and short-range planning efforts through the previously mentioned Community to Region Performance-based Planning Framework. The Framework links to six long-range plan goals and to the eight Federal planning factors that were in regulations at the time the 2035 RTP was developed. Use of the Framework enables the TPO to take a community-scaled approach to assessing the potential return on investment for projects and to more fairly evaluate projects of different scales in their project selection process.

While the TPO has experience in performance-based planning and programming, there are still uncertainties within this program area for which the TPO must prepare itself. TPO staff is awaiting finalization of TDOT and GDOT's performance measure target-setting process required by MAP-21/FAST Act to begin the process for setting complementary targets within the MPA. The TPO is evaluating additional data needs, sources, and analyses that may be needed to address the specific MAP-21/FAST Act performance measure targets. Particular challenges facing the TPO are managing potentially different statewide targets set by TDOT and GDOT, gaining access to sufficient, quality data sources to support performance evaluations, and sufficiently programming staff and resources to manage a robust performance-based planning program.

Commendation

The TPO uses the community-informed performance categories, goals, and objectives summarized in the Framework across planning products. This approach is a best practice which enhances the consistency of project prioritization and selection across planning products and promotes the advancement of top-performing projects.

Recommendation

The Review Team recommends TDOT present to the TPO Executive Board an overview of the State's overall performance measure target setting approach and a summary of the State's targets for the Safety Performance Measures and all upcoming Performance Measures.

4.6 Public Involvement and Title VI Compliance

4.6.1 Regulatory Basis

23 CFR 450.316 Interested Parties, Participation, and Consultation
23 CFR 450.336 Self-certifications and Federal certifications

4.6.2 Status and Findings – Public Involvement

The TPO's Participation Plan outlines strategies to provide and receive information from the public on transportation planning and programming processes. The Participation Plan supports continuing involvement of the public and local community leaders in developing plans, programs and projects. Involvement with local community leaders helps to determine suitable meeting forums and information formats to foster input, especially when soliciting target populations. The TPO determines the type of public outreach efforts employed for a project based on the regional and local impact. Following each public event and meeting the TPO evaluates attendance and makes changes, as necessary, to improve the future events by moving locations, targeting certain groups, or holding focus groups specifically for an underrepresented group. As mentioned in Section 4.3.3 – TPO Structure, the TPO routinely assesses the effectiveness of Executive Board and TCC meetings and needs through surveys. The TPO uses the feedback from the Executive Board and the TCC to customize meeting format and content to improve coordination activities and better address Board and Committee needs.

The TPO strives to hold meetings at locations and times that are convenient and accessible. The TPO provides notice of upcoming public review meetings and review periods to known interested parties such as public transportation employees, providers of freight transportation services, users of public transportation, users of pedestrian and bicycle facilities, disabled, elderly, low-income and limited English-speaking populations. The TPO uses its website to disseminate information on meetings, projects, planning documents and other information. The TPO gathers information from the public via surveys, comment cards, transit surveys as well as through creation of both a Community Advisory Committee and Core Technical Team Committee. The TPO participates in La Paz functions, the leading organization connecting the increasing Latino community to resources in the Chattanooga area.

The TPO Executive Board approved an amendment to the TPO's Participation Plan on May 28, 2013. The TPO conducted an evaluation of the Participation Plan in 2015 and 2016. The

purpose of this evaluation is to determine the effectiveness of the Participation Plan in the areas of participation opportunities, outreach, public resources, and additional evaluation measures. This study quantified the public outreach activities at the TPO and measured levels of success using a variety of outreach methods. Using the results of the evaluation, the TPO was able to graphically represent areas of Limited English Proficiency (LEP), Environmental Justice Areas (EJ), and Transportation Disadvantaged Areas within the TPO boundaries. The study also tracked internet traffic on the TPO's website and social media pages and gathered information on internet usage by race, income, geography, and age. The TPO also makes use of analysis tools, such as Google Analytics and public meeting assessment cards, to assess routinely the effectiveness of their public engagement activities. These tools allow the TPO more constant information on meeting attendee demographics, meeting locations, and outreach methods. The new Participation Plan is scheduled for completion in the fall of 2017.

The TPO makes excellent use of visualization techniques to convey complex or data-driven information to the public in an easily digestible manner. The TPO routinely uses sketches, maps, simulated photos, and geographic information systems, among other visual tools, to clarify planning concepts and to solicit public input. In particular, the TPO has been successful in their use of infographics to easily present information graphically. An excellent example of this technique to highlight is the infographic conveying the benefits of the GreenTrips program (Figure 1).

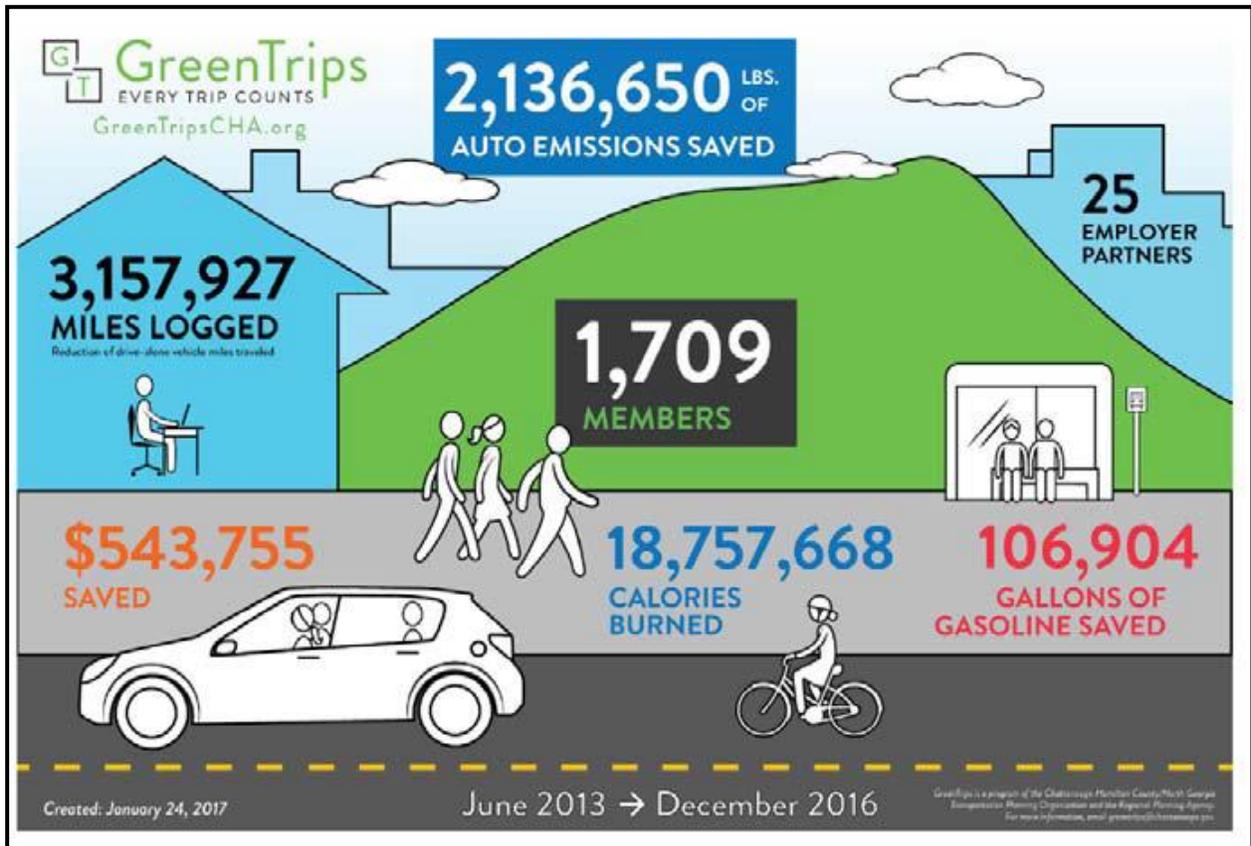
Commendation

The TPO conducts routine and consistent assessment of their public involvement effectiveness using a variety of techniques. The mix of traditional assessment techniques, such as meeting cards, and technological assessment techniques, such as Google Analytics, provides the TPO with views from a broad cross-section of public and across multiple outreach mediums. The TPO also routinely solicits feedback from their Executive Board, TCC, and CACs on outreach approaches and meeting management. The regularity with which the TPO conducts these assessments has contributed to the creation of a strong baseline and body of data for the identification of process improvement.

4.6.3 Status and Findings – Civil Rights, Title VI, Environmental Justice

The TPO ensures compliance with Title VI of the Civil Rights Act of 1964 and related statutes and regulations to the end that no person shall be excluded from participation in or be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance from the U.S. Department of Transportation on the grounds of race, color, sex, or national origin. The TPO strives to distribute funding, projects, and services in a nondiscriminatory manner. Their goal is to ensure that the public has full opportunity to participate in the transportation decisionmaking process and the development of specific plans, programs, and projects. The TPO reviews plans, programs, and projects to ensure the equitable distribution of impacts. The TPO works closely with CARTA and SETHRA to distribute transit services in a non-discriminatory manner.

Figure 1. Infographic Example – GreenTrips Benefits



The TPO uses demographic and socioeconomic data from the Census, on-board transit surveys, and a mobility gaps analysis to identify the location of targeted disadvantaged populations and analyze the potential impacts of transportation plans and programs on these communities. The TPO is incorporating information on population density, transit dependency, and new transit service feasibility into the Small Area Plans that are underway.

The TPO’s Executive Board and TCC meetings provide a forum for interested stakeholders to discuss projects and resolve community issues. The TPO has not received any Title VI complaints regarding the metropolitan transportation planning process since the last TMA certification review.

Recommendation

The Review Team recommends the TPO incorporate into their current assessment of their website compliance with Section 508 of the Rehabilitation Act of 1973, as amended in 1998, and include any identified necessary changes to make their electronic information fully accessible for people with disabilities. This could include measure such as allowing adjustment to font sizes or incorporating speech services for the visually impaired.

4.7 Congestion Management Process and ITS

4.7.1 Regulatory Basis

23 CFR 450.306	Scope of the metropolitan transportation planning process
23 CFR 450.322	Congestion management process in transportation management areas
23 CFR 500.109	CMS
23 CFR 940.9	Regional ITS architecture

4.7.2 Status and Findings – CMP

The TPO uses the CMP to guide transportation planning activities directed at preventing, alleviating, and reducing traffic congestion in the Chattanooga metropolitan planning area. The CMP defines the Chattanooga urban area roadway network using the federal functional classification of roadways and calculates the Level of Service based on annual average daily traffic volumes. The TPO uses a combination of performance evaluation measures to help identify and measure roadway congestion within the region, including Vehicle Miles Traveled, Annual Congestion Costs, Delay on Critical Freight Corridors, Delay per Capita and Mode Split. The CMP assesses historic and existing traffic congestion and future travel conditions and classifies congestion at three levels – marginal, moderate, and severe.

The TPO currently is updating their 2010 CMP. The anticipated completion date for the CMP update is the fall of 2017. The TPO is updating the CMP with the intent to directly incorporate the CMP results and recommendations into the 2045 RTP. The TPO is still finalizing details of how the integration of the CMP into the RTP will occur. As part of the TPO's coordinated performance management approach, the CMP addresses the 2040 and 2045 RTP goals. Further enhancement to the CMP could be made by the TPO including specific performance thresholds or targets for assessment of the effectiveness of projects implemented from the CMP in addressing congestions. The TPO also could benefit congestion relief efforts by more strongly advocating for project sponsors to incorporate proven CMP strategies into projects.

The TPO noted that capacity projects should be bundled with congestion management strategies to maximize the benefit of the investment, but there were few details on how this principle is being carried out in the planning area. The CMP could be improved by

incorporating more documented controls into the project programming and post-programming processes to ensure project sponsors appropriately consider and implement congestion relief strategies into capacity-adding projects.

Recommendation

The Review Team recommends the TPO incorporate analytical methodologies into the CMP to assess the performance of projects derived from the CMP in reducing congestion. The update to the CMP could include targets for performance and a process to evaluate projects after implementation for their ability to achieve those targets. The results of this assessment should be used to inform the prioritization and selection of future projects from the CMP.

4.7.3 Status and Findings – Regional ITS Architecture

The Regional ITS Architecture is a roadmap for transportation systems integration and provides an overarching framework that spans all of the region's transportation organizations and individual transportation projects. The geographic boundaries of the architecture match the metropolitan planning area boundaries, including Hamilton County in Tennessee, Catoosa County and the northern portions of Dade and Walker counties in Georgia.

The TPO developed the Regional ITS Architecture through a continuous, cooperative, and comprehensive planning effort with a diverse set of stakeholders in its Planning for Operations Working Group, encompassing traffic, transit, public safety, and many other operating agencies at local, state, and national levels, covering all modes and all roads in the region. The architecture represents a shared vision of how each agency's systems will work together in the future, sharing information and resources to provide a safer, more efficient, and more effective transportation system for travelers in the Chattanooga region. The architecture enables the TPO to view each transportation project as an element of the overall transportation system, providing visibility into the relationship between individual transportation projects and ways to build an integrated transportation system over time.

The TPO last updated their Regional ITS Architecture in 2014. The TPO is updating the Regional ITS Architecture and associated Deployment Plan in concert with the 2045 RTP update. The anticipated completion date for the Regional ITS Architecture update is the summer of 2017.

The architecture currently includes a documented maintenance process. It also includes a systems engineering process for the development of ITS projects throughout the region and satisfies the guidance recommendations outlined in TDOT's 2016 ITS Project Development Guidelines. Similar to the TPO's other planning products and processes, the Regional ITS Architecture reflects the TPO's coordinated performance management approach and reflects the 2040 and 2045 RTP goals.

4.8 Air Quality

4.8.1 Regulatory Basis

- 40 CFR 51 Requirements for preparation, adoption, and submittal of implementation plans
- 40 CFR 93 Determining conformity of federal actions to State or Federal Implementation Plans

4.8.2 Status and Findings – Air Quality Transportation Conformity

The Environmental Protection Agency (EPA) previously listed the Chattanooga region as a nonattainment area for one National Ambient Air Quality Standard (NAAQS) – the 1997 annual standard for particulate matter less than 2.5 micrometers in diameter (PM2.5). On October 24, 2016, EPA revoked the annual PM2.5 national ambient air quality standard for the Chattanooga, TN-GA-AL PM2.5 maintenance area. As of that date, there is no requirement for the region to demonstrate transportation conformity, including hot-spot analyses for the PM2.5 standard.

4.8.3 Status and Findings – CMAQ

While no longer in nonattainment, the Chattanooga region remains eligible for the use of CMAQ funds from the statewide PM2.5 set aside. The TPO continues to serve a role in advising member jurisdictions of the availability of these funds and eligible work types. In 2017, the TPO partnered with the Cleveland MPO on the Cleveland-Chattanooga Commute Hub project, which will result in a park and ride facility and transit options to connect commuters between Cleveland and Chattanooga.

In 2016, TDOT revised the State’s process to request applications from local governments for CMAQ funds and to screen projects for project selection. While TDOT improved the process by creating documented procedures and conducted outreach to local governments to explain the CMAQ program, the MPOs were removed as an active participant in the project call and screening process.

Recommendation

The Review Team recommends TDOT revisit their statewide process for soliciting applications for CMAQ funds to ensure coordination occurs with the TPO early in the application process. The TPO can serve a valuable function in providing guidance to member jurisdictions on eligible project types and to ensure projects are screened appropriately through the TPO’s project prioritization and selection process to achieve consistent regional goals and visions.

4.9 Transit

4.9.1 Regulatory Basis

49 CFR Subtitle B, Chapter VI Federal Transit Administration, Department of
Transportation

4.9.2 Status and Findings – Transit Coordination and Planning

The TPO is involved actively in multimodal transportation, which includes both urban and rural transit providers, and is proactive in supporting, improving, and expanding transit mobility and accessibility in the Chattanooga metropolitan planning area. The TPO maintains a highly effective working relationship with the Chattanooga Regional Transportation Authority (CARTA), Southeast Tennessee Human Resources Agency (SETHRA), Dade County Transit, Walker County Transit, and Catoosa County Transit, among other providers.

CARTA is a member of the Executive Board and TCC and coordinates with the TPO in the development of key planning products. The TPO engages SETHRA and the other rural transit providers in the development of the metropolitan transportation plan and other planning products, as needed. CARTA is the designated recipient for federal transit funds and receives annual allocations of Urbanized Area Formula (Section 5307) and Fixed Guideway Modernization (Section 5309) funding, which the agency uses for capital and maintenance expenditures.

The TPO assists the transit providers in delivering the Coordinated Public Transit-Human Services Transportation Plan (Coordinated Plan). The TPO adopted an updated Coordinated Plan in April 2014. Since that adoption date, the TPO has held two annual reviews of the Coordinated Plan, participated in three transit studies, participated in CARTA's on-board data collection study, and hosted the first of an intended series of Coordinated Plan Symposium.

As previously mentioned in the discussion of the RTP development, the TPO is focusing the 2045 RTP update on enhancing the connection between land use and transportation planning to improve multimodal transportation and economic development. TPO staff identified areas with existing transit services, areas with current transit potential based on existing land use and density, and areas where existing land use and density make transit potential borderline for success. The result of this analysis was recommendations for development districts that were documented in each small area plan. The area studies have been useful in focusing the TPO, transit providers, and project sponsors on identifying transportation solutions that will most effectively and efficiently address needs. For example, the Highway 153 Bus Rapid Transit study revealed that, contrary to expectations, the corridor would not be able to support feasibly bus rapid transit service with the area's current land use. This led the project sponsors to consider alternative approaches to service needs in the corridor that are better suited to the land use.

The TPO partnered with CARTA to complete their on-board survey in late 2015. The survey followed a methodology consistent with previous surveys, including survey of the fixed route and shuttle services. The data from this survey mainly establishes the demographics of riders and assists CARTA in routings. A new analysis undertaken resulted from CARTA and the TPO's participation in the Mayor's Council for Women Transportation Committee. In their participation, CARTA and the TPO were able to use data from the on-board survey to supplement the Committee data for more robust and data-oriented analysis. As part of this effort, CARTA was able to identify a significant issue for women riders with children accessing transit due to systems gaps in their first and last miles of commute. This identification led to the Committee prioritizing sidewalk projects.

Of particular note in CARTA's current activities is the positive emphasis the organization continues to place upon servicing the transit-dependent population. While it is important to grow the transit system by attracting choice riders—those not dependent on transit—it is vital to continue to effectively provide quality service to those who must use transit to access jobs, schools, essential services, and retail.

Commendation

The TPO has taken a leadership role in maintaining frequent, open communication between area transit and service providers. In particular, the Review Team recognizes the TPO's initiation of their region's Coordinated Plan Symposium. This effort brings together transit and service providers to share information, educate one another on on-going activities, and improve coordination of processes, plans, and services.

Commendation

CARTA maintains effective, quality transit services and planning for services for the disabled and continues to emphasize services for transit-dependent populations. Their emphasis ensures that those most vulnerable and at-need populations can continue to access jobs, schools, retail, and essential services. This effort is an embodiment of the US DOT's initiatives to connect communities and assist individuals in improving the quality of their lives.

5.0 Conclusion

The 2017 Chattanooga Region TMA Certification review included a desk review, site visit, a public involvement opportunity, and a final report. Since the prior certification review of the Region in 2013, FHWA and FTA have continuously reviewed the TPO's planning products for consistency with Federal regulations and rules.

The Review Team, with input from TDOT and GDOT, discussed the TPO's transportation planning process with TPO staff, the TPO Executive Board Committee, and other certification review attendees (e.g., CARTA) over the course of two days, April 26 and April 27, 2017. The Federal Review Team held a public meeting on the evening of April 25, 2017 to provide opportunity for public input on the metropolitan planning process. No general members of the public attended the meeting.

In conclusion, the Chattanooga-Hamilton County / North Georgia TPO substantially meets the requirements of 23 CFR 450 and 49 CFR 613. FHWA and FTA jointly certify the TPO's metropolitan transportation planning process. The Review Team did not find any corrective actions.

The Review Team urges the TPO and TDOT to have ongoing review and discussion to address the seven recommendations included in the 2017 TMA Certification Review Report prior to the next Certification Review in four years.

Appendix A – Summary of findings and status from the 2013 TMA Certification Review

2013 Recommendations	TPO Response
<p>Develop a Continuity of Operations Plan (COOP) to ensure the stability of essential office functions in the occurrence of a major event/emergency/disaster.</p>	<p>A COOP has been completed and was presented to the Technical Coordinating Committee in May 2016 and to the Executive Board in June 2016. The COOP is available online.</p>
<p>Incorporate the 2040 RTP goals and objectives into the TPO’s UPWP and clarify how the activities in the Work Program guide the continuous, comprehensive, and cooperative development of other planning products (e.g. transportation improvement program, congestion management process, public).</p>	<p>The FY 2016-2017 UPWP lists activities that connect the 2040 RTP goals, objectives and recommendations to development of other planning projects including the following (activity text has been updated to reflect completed tasks):</p> <ul style="list-style-type: none"> ▪ The TPO continues to implement recommendations of its Climate Change and Transportation Resiliency Report developed as part of the 2040 RTP. These activities may include integrating climate change into statutory processes for the next RTP, addressing complementary planning and project prioritization efforts and inclusion of resiliency in the project development process. ▪ The 2040 RTP conducted several analyses to better understand connectivity needs and the extent of multimodal capacities through a transit, bicycle, and pedestrian gap analysis, a health impact assessment, and evaluation of housing and transportation costs within the TPO area. This helped to identify needed improvements and provide support for future land use and transportation studies. The TPO finalized Subarea Transportation Planning Studies centered on specific projects of the fiscally constrained 2040 RTP project list. ▪ Integrates the objectives, performance measures, monitoring, and evaluation elements in the CMP and Planning for Operations with various planning activities such as subarea planning and comprehensive planning framework through the Community to Region Scale for performance measurement which was established in the 2040 RTP. ▪ Continues progress in integrating livability elements in various planning activities including, but not limited to, multimodal and livable corridor planning, the continued use of the Community to Region Scale for performance measurement, and through the second phase of the countywide comprehensive planning framework, the Strategy for Great Places.

	<p>The second phase will include the outcomes or recommendations of the Subarea Transportation Planning Studies that were centered on specific projects of the fiscally constrained 2040 RTP project list. The studies will include priority corridors, transit oriented development locations or circulator areas, and areas in need of multimodal access improvements.</p>
<p>Coordinate with Federal and State planning partners on documenting planning priorities, previous accomplishments, work schedules, and training opportunities during the development of the UPWP.</p>	<p>This was done during development of both the FY 2015 and FY 2016-2017 UPWPs. Staff began developing the FY 2018-2019 UPWP in January 2017 and has been coordinating with State and Federal partners in the development of that document.</p>
<p>Ensure that the approval letters from the Governors of Georgia and Tennessee concerning the Metropolitan Planning Area boundaries are filed and readily available.</p>	<p>The approval letters are saved in the TPO's digital archives and paper files. Copies are available upon request.</p>
<p>Examine the Prospectus, By-Laws, and planning agreements to ensure the documents are up-to-date, consistent, and reflect any changes in metropolitan planning area boundaries, membership, responsibilities, and Federal requirements.</p>	<p><u>Prospectus</u>: The TPO's Prospectus was updated in February 2017 to reflect the major changes to agreements and partnerships that were part of the air quality nonattainment designation. Additionally, changes were made to Federal legislation references and agency divisional names.</p> <p><u>By-Laws</u>: The TPO's TCC and Executive Board by-laws have been amended within the past two years in response to changes in membership and responsibilities and references to address FAST Act changes.</p> <p><u>Planning Agreements</u>: Recent updates to planning agreements include the following:</p> <ul style="list-style-type: none"> ▪ The TPO dissolved its agreement with GDOT regarding roles and responsibilities for future transportation conformity purposes under PM2.5 standards. A copy signed by both parties is in the TPO's digital and paper files ▪ The Memorandum of Agreement between the Cleveland Urban Area Metropolitan Planning Organization and the Chattanooga-Hamilton County/North Georgia Transportation Planning Organization regarding Intelligent Transportation Systems is being reviewed during the development of the ITS Architecture and Development Plan update currently underway.
<p>Formalize relationships with TDOT and GDOT to facilitate the continuous sharing of safety information and ensure the TPO is involved in future Strategic Highway Safety Plan (SHSP) updates and</p>	<p>The TPO receives safety information from GDOT and TDOT. The TPO is participating in quarterly Strategic Highway Safety Plan (SHSP) meetings with TDOT and has access to the TDOT Tennessee Integrated Traffic Analysis Network (TITAN) system. The TPO reviewed and provided input into TDOT's SHSP,</p>

<p>the development of specific safety strategies and performance targets for the Chattanooga metropolitan planning area.</p>	<p>approved in 2015. The TPO participated in a TDOT-hosted FHWA Safety Target Setting Workshop In November 2016 that included a review safety data for safety targets and a discussion of coordination approaches and target accountability.</p>
<p>Continue to involve TDOT in the development of updates to the Regional Transportation Plan and to integrate the results of the Tennessee Extreme Weather Project.</p>	<p>Available TDOT information on the Tennessee Extreme Weather Project was reviewed and to the extent possible, recommendations were included in the 2040 RTP. A Climate Adaption workshop was held, during development of the 2040 RTP, by the TPO staff and consultant team to more specifically capture local issues and inform recommendations for the 2040 fiscally constrained project list. TDOT was an active participant in this event.</p>
<p>Engage TDOT, GDOT, and public transit agencies on MAP-21/FAST Act requirements, especially the Transportation Performance Management elements on performance measures and performance targets.</p>	<p>TPO staff and consultant team developed a new performance-based planning and project evaluation process for the 2040 RTP, referred to as the Community to Region Performance Framework. TDOT, GDOT, and public transit agencies were active partners in workshops dedicated to the development of the performance measures and geographic scales associated with the measures and the chosen weights for the project evaluation process. This new framework and process received the 2015 Transportation Planning Excellence Award by FHWA and FTA. Details can be found on the TPO's website here: http://www.chcrpa.org/2040RTP.htm</p>
<p>Continue to work with TDOT and GDOT to enable the continuous sharing of project/program obligations and expenditures.</p>	<p>TPO staff prepares the Annual Obligated List of Projects through coordination with TDOT, GDOT, and CARTA. TPO staff requested to be copied on correspondence or supplied copies of contracts and/or notices to proceed when obligations occur. TDOT and GDOT have been regularly providing this information. TPO staff also reviews quarterly obligation reports when provided by TDOT and GDOT. TPO staff also routinely provides documentation letters that acknowledge the TPO's support of projects/programs that flex FHWA administered funding to FTA.</p>
<p>Consider collecting demographic data at public meetings using TDOT's Data Collection Toolkit to better understand audience participation.</p>	<p>The TPO now provides an input card to each public meeting participant. The card is in both English and Spanish and completion of the information is voluntary. The card asks for demographic information, ability to speak the English language, access to internet, meeting notification preference and income. The information is entered into a database along with the meeting location and total number of attendees.</p>
<p>Consider developing objectives for traffic incident management and construction work zones as part of the updated CMP and 2040 Regional Transportation Plan to address the sources of non-recurring congestion in the Chattanooga region.</p>	<p>One of the proposed objectives for the 2017 Congestion Management Process update is "Improve incident clearance times on major highways/arterials".</p>
<p>Evaluate congestion mitigation strategies for effectiveness by</p>	<p>TPO has included this recommendation as part of the scope of work of the 2017 CMP update. The consultant will recommend</p>

<p>monitoring roadway conditions before and after targeted improvements.</p>	<p>a process for TPO to evaluate the effectiveness of congestion mitigation strategies by monitoring roadway conditions before and after targeted improvements. TPO plans to use available output from the regional travel demand model and sketch planning tools to test the effectiveness of strategies. Baseline conditions of the location, extent and duration of congestion will be developed for the region during the CMP update. Regional travel demand model outputs can be used to calculate performance measures and evaluate the congestion impacts and to identify potential benefits by the specific region, subregion, corridor, and project levels in the project evaluation process as part of the RTP Update.</p>
<p>Engage Federal, State, and local planning partners before the next update to the Congestion Management Process to capture best practices and maximize available resources.</p>	<p>During the development of 2017 CMP update, TPO had a workshop with Federal, State and local planning partners to review and discuss the objectives, guiding principles and performance measures and network of CMP as well as data availability. A survey was also distributed to these partners for their opinions on CMP issues and strategies. A second workshop is also planned for reviewing the final draft with these partners.</p>
<p>2013 Corrective Action</p>	<p>TPO Response</p>
<p>Review and update the 1997 MOU concerning the continuing, comprehensive, and cooperative transportation planning process by July 16, 2014 (one year after the certification date) in accordance with the Action Plan outlined in Appendix G of the 2013 Chattanooga TMA Certification Review Final Report.</p>	<p>In partnership with CARTA, a Memorandum of Agreement (MOA) for Transit Planning Coordination and Cooperation between CARTA and the TPO was developed. The purpose of the MOA was to establish a written working agreement between the TPO and CARTA to ensure a comprehensive, cooperative, and continuous regional transportation planning process. The MOA defines the processes for cooperation, communication, and exchanging information relative to that process. This MOA includes specific provisions for cooperatively developing and sharing of information related to development of the TPO's Regional Transportation Plan, the Transportation Improvement Program (TIP), and the Annual Obligated List of Projects.</p> <p>The TPO Executive Board approved the MOU on June 17, 2014. The TPO Executive Board endorsed the Prospectus on June 17, 2014. FHWA determined the corrective action satisfied on June 26, 2014.</p>
<p>Coordinate with Federal and State planning partners on documenting planning priorities, previous accomplishments, work schedules, and training opportunities during the development of the UPWP.</p>	<p>This was done during development of both the FY 2015 and FY 2016-2017 UPWPs. Staff began developing the FY 2018-2019 UPWP in January 2017 and has been coordinating with State and Federal partners in the development of that document.</p>
<p>Ensure that the approval letters from the Governors of Georgia and Tennessee</p>	<p>The approval letters are saved in the TPO's digital archives and paper files. Copies are available upon request.</p>

<p>concerning the Metropolitan Planning Area boundaries are filed and readily available.</p>	
<p>Examine the Prospectus, By-Laws, and planning agreements to ensure the documents are up-to-date, consistent, and reflect any changes in metropolitan planning area boundaries, membership, responsibilities, and Federal requirements.</p>	<p><u>Prospectus</u>: The TPO’s Prospectus was updated in February 2017 to reflect the major changes to agreements and partnerships that were part of the air quality nonattainment designation. Additionally, changes were made to Federal legislation references and agency divisional names.</p> <p><u>By-Laws</u>: The TPO’s TCC and Executive Board by-laws have been amended within the past two years in response to changes in membership and responsibilities and references to address FAST Act changes.</p> <p><u>Planning Agreements</u>: Recent updates to planning agreements include the following:</p> <ul style="list-style-type: none"> ▪ The TPO dissolved its agreement with GDOT regarding roles and responsibilities for future transportation conformity purposes under PM2.5 standards. A copy signed by both parties is in the TPO’s digital and paper files ▪ The Memorandum of Agreement between the Cleveland Urban Area Metropolitan Planning Organization and the Chattanooga-Hamilton County/North Georgia Transportation Planning Organization regarding Intelligent Transportation Systems is being reviewed during the development of the ITS Architecture and Development Plan update currently underway.
<p>Formalize relationships with TDOT and GDOT to facilitate the continuous sharing of safety information and ensure the TPO is involved in future Strategic Highway Safety Plan (SHSP) updates and the development of specific safety strategies and performance targets for the Chattanooga metropolitan planning area.</p>	<p>The TPO receives safety information from GDOT and TDOT. The TPO is participating in quarterly Strategic Highway Safety Plan (SHSP) meetings with TDOT and has access to the TDOT Tennessee Integrated Traffic Analysis Network (TITAN) system. The TPO reviewed and provided input into TDOT’s SHSP, approved in 2015. The TPO participated in a TDOT-hosted FHWA Safety Target Setting Workshop In November 2016 that included a review safety data for safety targets and a discussion of coordination approaches and target accountability.</p>
<p>Continue to involve TDOT in the development of updates to the Regional Transportation Plan and to integrate the results of the Tennessee Extreme Weather Project.</p>	<p>Available TDOT information on the Tennessee Extreme Weather Project was reviewed and to the extent possible, recommendations were included in the 2040 RTP. A Climate Adaption workshop was held, during development of the 2040 RTP, by the TPO staff and consultant team to more specifically capture local issues and inform recommendations for the 2040 fiscally constrained project list. TDOT was an active participant in this event.</p>
<p>Engage TDOT, GDOT, and public transit agencies on MAP-21/FAST Act requirements, especially the Transportation Performance</p>	<p>TPO staff and consultant team developed a new performance-based planning and project evaluation process for the 2040 RTP, referred to as the Community to Region Performance Framework. TDOT, GDOT, and public transit</p>

<p>Management elements on performance measures and performance targets.</p>	<p>agencies were active partners in workshops dedicated to the development of the performance measures and geographic scales associated with the measures and the chosen weights for the project evaluation process. This new framework and process received the 2015 Transportation Planning Excellence Award by FHWA and FTA. Details can be found on the TPO's website here: http://www.chcrpa.org/2040RTP.htm</p>
<p>Continue to work with TDOT and GDOT to enable the continuous sharing of project/program obligations and expenditures.</p>	<p>TPO staff prepares the Annual Obligated List of Projects through coordination with TDOT, GDOT, and CARTA. TPO staff requested to be copied on correspondence or supplied copies of contracts and/or notices to proceed when obligations occur. TDOT and GDOT have been regularly providing this information. TPO staff also reviews quarterly obligation reports when provided by TDOT and GDOT. TPO staff also routinely provides documentation letters that acknowledge the TPO's support of projects/programs that flex FHWA administered funding to FTA.</p>
<p>Consider collecting demographic data at public meetings using TDOT's Data Collection Toolkit to better understand audience participation.</p>	<p>The TPO now provides an input card to each public meeting participant. The card is in both English and Spanish and completion of the information is voluntary. The card asks for demographic information, ability to speak the English language, access to internet, meeting notification preference and income. The information is entered into a database along with the meeting location and total number of attendees.</p>
<p>Consider developing objectives for traffic incident management and construction work zones as part of the updated CMP and 2040 Regional Transportation Plan to address the sources of non-recurring congestion in the Chattanooga region.</p>	<p>One of the proposed objectives for the 2017 Congestion Management Process update is "Improve incident clearance times on major highways/arterials".</p>
<p>Evaluate congestion mitigation strategies for effectiveness by monitoring roadway conditions before and after targeted improvements.</p>	<p>TPO has included this recommendation as part of the scope of work of the 2017 CMP update. The consultant will recommend a process for TPO to evaluate the effectiveness of congestion mitigation strategies by monitoring roadway conditions before and after targeted improvements. TPO plans to use available output from the regional travel demand model and sketch planning tools to test the effectiveness of strategies. Baseline conditions of the location, extent and duration of congestion will be developed for the region during the CMP update. Regional travel demand model outputs can be used to calculate performance measures and evaluate the congestion impacts and to identify potential benefits by the specific region, subregion, corridor, and project levels in the project evaluation process as part of the RTP Update.</p>
<p>Engage Federal, State, and local planning partners before the next update to the Congestion Management Process to capture best practices and maximize</p>	<p>During the development of 2017 CMP update, TPO had a workshop with Federal, State and local planning partners to review and discuss the objectives, guiding principles and performance measures and network of CMP as well as data</p>

available resources.	availability. A survey was also distributed to these partners for their opinions on CMP issues and strategies. A second workshop is also planned for reviewing the final draft with these partners.
2013 Corrective Action	TPO Response
<p>Review and update the 1997 MOU concerning the continuing, comprehensive, and cooperative transportation planning process by July 16, 2014 (one year after the certification date) in accordance with the Action Plan outlined in Appendix G of the 2013 Chattanooga TMA Certification Review Final Report.</p>	<p>In partnership with CARTA, a Memorandum of Agreement (MOA) for Transit Planning Coordination and Cooperation between CARTA and the TPO was developed. The purpose of the MOA was to establish a written working agreement between the TPO and CARTA to ensure a comprehensive, cooperative, and continuous regional transportation planning process. The MOA defines the processes for cooperation, communication, and exchanging information relative to that process. This MOA includes specific provisions for cooperatively developing and sharing of information related to development of the TPO's Regional Transportation Plan, the Transportation Improvement Program (TIP), and the Annual Obligated List of Projects.</p> <p>The TPO Executive Board approved the MOU on June 17, 2014. The TPO Executive Board endorsed the Prospectus on June 17, 2014. FHWA determined the corrective action satisfied on June 26, 2014.</p>

Appendix B – Site Visit Participants

The following individuals participated in the site review held on April 25-27, 2017 in Chattanooga, TN.

Federal Highway Administration – Tennessee Division

Theresa Claxton, Planning and Program Management Team Leader
Joi Hamilton-Jones, Civil Rights Program Specialist
Nicholas Renna, Operations Program Manager
Jessica Rich, Safety Engineer
Sean Santalla, Planning and Air Quality Specialist

Federal Highway Administration – Georgia Division

Andrew Edwards, Planning Team Leader

Federal Highway Administration – Illinois Division

Vontra Giles, Community Planner

Tennessee Department of Transportation

Sara Elmore, OCT Region 2 Community Planning Specialist
Kelsey Finch, Civil Rights Division Contact Compliance Officer
Deborah Fleming, Senior Regional Planner
Stacy Morrison, OCT Region 2 Planning Supervisor
Joshua Suddath, OCT Planning Manager

Georgia Department of Transportation

Kelly Gwin, Project Manager
Darius Malone, Planning Engineer Associate

Chattanooga-Hamilton County / North Georgia Transportation Planning Organization and Chattanooga-Hamilton County Regional Planning Agency

John Bridger, Executive Director
Rozanne Brown, Administrative Support Specialist
Cortney Geary, Senior Multimodal Transportation Planner
Yuen Lee, Director Research and Analysis Division
Andrew Ray, Principal Planner
Karen Rennich, Deputy Director/TPO Coordinator
Melissa Taylor, Director Strategic Long Range Planning

Chattanooga Area Regional Transit Authority

Lisa Maragnano, Executive Director
Annie Powell, Director of Grants, Technology, and Research

Appendix C – Certification Review Agenda

April 25, 2017		
6:00 – 7:00 pm		Public Meeting <i>Development Resource Center 1250 Market St. Chattanooga, TN 37402</i>
Time	Item	Lead
6:00 – 6:15 pm	Welcome, introductions, and overview	Federal Team <i>Lead: Theresa Claxton</i>
6:15 – 7:00 pm	Public comment and feedback	Public
7:00 pm		
Adjourn		
April 26, 2017		
9:00 am – 4:45 pm		ON-SITE REVIEW SESSION <i>Development Resource Center 1250 Market St. Chattanooga, TN 37402</i>
Time	Item	Lead
9:00 – 9:15 am	Welcome/Introductions Purpose of the Certification Review Agenda Overview	Federal Team <i>Lead: Theresa Claxton</i>
9:15 – 9:45 am	Discussion of Previous Review Findings	Federal Team <i>Lead: Theresa Claxton</i>
9:45 – 10:15 am	Best Practices, Lessons Learned, Recent Activities	TPO
10:15 – 10:30 am	Break	
10:30 – 11:30 am	TPO Overview (focus on changes since last Certification) TPO Organizational Structure Demographics Boundaries Agreements/Contracts Program/Process Changes	Federal Team <i>Lead: Theresa Claxton & Andres Ramirez</i>
11:30 am – 12:00 pm	Performance-based Planning and Programming	Federal Team <i>Lead: Jessica Rich & Tameka Macon</i>
12:00 – 1:30 pm	Lunch	
1:30 – 3:00 pm	TPO Board Meeting	TPO
3:00 – 3:15 pm	Break	
3:15 – 4:30 pm	Planning Products UPWP MTP TIP	Federal Team <i>Lead: Theresa Claxton, Andy Edwards, Sean Santalla, Jessica Rich, & Vontra Giles</i>
4:30 – 4:45 pm	Questions, comments, and next steps	
4:45 pm		
Adjourn		

April 27, 2017

ON-SITE REVIEW SESSION		
9:00 am – 4:15 pm		<i>Development Resource Center 1250 Market St. Chattanooga, TN 37402</i>
Time	Item	Lead
9:00 – 9:10 am	Prior Day Recap	Federal Team <i>Lead: Theresa Claxton</i>
9:10 – 9:45 am	FHWA and FTA Initiatives Freight Bicycle and Pedestrian Planning Training Needs Other	Federal Team <i>Lead: All members</i>
9:45 – 10:15 am	Public Involvement, Environment Justice, & Title VI	Federal Team <i>Lead: Joi Hamilton Jones & Vontra Giles</i>
10:15 – 10:30 am	Break	
10:30 – 11:00 am	Congestion Management Process	Federal Team <i>Lead: Nick Renna</i>
11:00 – 11:30 am	Intelligent Transportation Systems (ITS)	Federal Team <i>Lead: Nick Renna</i>
11:30 am – 1:00 pm	Lunch	
1:00 – 1:45 pm	Air Quality	Federal Team <i>Lead: Theresa Claxton</i>
1:45 – 2:30 pm	Transit	Federal Team <i>Lead: Andres Ramirez</i>
2:30 – 3:30 pm	Federal Review Team Closed-Session Discussion of Preliminary Findings	Federal Team <i>Lead: All members</i>
3:30 – 4:15 pm	Close Out Review of Preliminary Findings Questions, comments, and next steps	Federal Team <i>Lead: Theresa Claxton</i>
4:15 pm	Adjourn	

Appendix D - Comments Received and Responses

The Review Team held a public meeting on April 25, 2017 to solicit input from the general public on the effectiveness of the Region's transportation planning process. The meeting was held in the Development Resource Center in Chattanooga. The meeting location was transit- and ADA-accessible. The TPO published notice for the meeting in area newspapers and online, in accordance with their Participation Plan. No members of the public attended the meeting and no comments were received.

The Review Team also presented information on the Federal Certification Review to and solicited feedback from the TPO Executive Board members and members of the public in attendance at the TPO Board Meeting on April 26, 2017. The Review Team received one verbal comment and two written comments.

Verbal Comments

Blythe Bailey, Administrator, City of Chattanooga, Department of Transportation.

Comment: Mr. Bailey appreciated the work of the TPO staff and thanked the Review Team for presenting information on the transportation planning process. Mr. Bailey requested any graphics or presentations available to help simply explain the transportation planning process and how the required products for the process interrelate.

Response: The Review Team shared this request with the TDOT's Long Range Planning Division. TDOT will investigate creating a brief video or web-based presentation for MPO/TPO use to introduce Board members and the general public to the transportation planning process.

Written Comments

Bob Colby, Chattanooga-Hamilton County Air Pollution Control Bureau

Comment: I have served on the CHCNGA TPO and the Technical Coordinating Committee for many years and have been with the local air pollution control agency for 37 years. In that time, Chattanooga has come from being the dirtiest city in the United States for particulate matter air pollution to one of the cleanest, as of 2016. The local TPO has been intentional about including me in the process of its business for many years and has, in my experience with my counterparts across the country, deviated from the general practice of many MPOs and TPOs in that respect. I have served as vice-chairman and chairman. This agency takes its role in seeking to reduce air pollution through the effective management of growth and traffic seriously.

Response: Thank you for your input on the transportation planning process and the TPO's role in effective management of congestion and air quality. Your comment has been considered in the Review Team's certification review determination.

Billy Cooper, Ridgeside

Comment: Very good.

Response: Thank you for your input on the Region's transportation planning process. Your comment has been noted and considered in the Review Team's certification review determination.



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