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Grand Valley Metropolitan Council (GVMC) Transportation Planning Certification Review:
Final Report

Dear Mr. Weiss and Mr. White,

The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) have completed a review of the transportation planning process for the Grand Rapids Transportation Management Area (TMA). The objective was to determine if the planning process in the region meets the federal requirements for metropolitan transportation planning outlined in 23 U.S.C §134 and 49 U.S.C. §5303. We have found that the process meets the federal planning regulations. We therefore certify the transportation planning process in the Grand Rapids TMA.

The details of the review and findings are contained in the enclosed report. We look forward to continuing to work with the transportation partners in the region to improve the planning process in the Grand Rapids Area.

If you have any questions, please contact Andrew Sibold by email at andrew.sibold@dot.gov or Susan Weber by email at susan.weber@dot.gov.

Sincerely,

Sincerely,

Theodore G. Burch, P.E.
Division Administrator
Federal Highway Administration

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GEF

Enclosure/s: 2022 GVMC Certification Review Final Report

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U.S. Department
of Transportation

Transportation Management Area Planning Certification Review

Federal Highway
Administration

Federal Transit
Administration

Grand Rapids, Michigan Transportation Management Area



September 27, 2022

Summary Report

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1.0 EXECUTIVE SUMMARY

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted the certification review of the transportation planning process for the Grand Rapids urbanized area. At least every four years, FHWA and FTA must jointly review and evaluate the transportation planning process for urbanized areas with a population over 200,000 to determine if the process meets federal planning requirements.

On June 8th and 9th, 2022, FHWA and FTA conducted a virtual site visit as part of the certification review of the transportation planning process for the Grand Rapids region. The site visit was preceded by a desk review of various documents related to the planning process in the region, as well as ongoing interaction between FTA and FHWA with the planning partner agencies in the Grand Rapids region.

1.1 Previous Findings

The first certification review for the Grand Rapids urbanized area was conducted in 1996. The second and third certification reviews were conducted in 2014 and 2018, respectively. The findings and disposition from the previous certification reviews are provided in Appendix B and summarized below.

1.2 Summary of Current Findings

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

FHWA and FTA are certifying the transportation planning process conducted by the Michigan Department of Transportation (MDOT), Grand Valley Metropolitan Council (GVMC) Metropolitan Planning Organization (MPO) and The Rapid. The review found no corrective



actions, seven commendations that are noteworthy practices, and nine recommendations that warrant close attention and follow-up:

Commendations

Commendation: GVMC's [Transportation Committee Handbook](#), referred to as the Membership Binder, is a valuable reference guide and noteworthy practice. This product helps to integrate policy board members more easily into their planning process. It being publicly accessible helps to present the highly technical process of transportation planning to the public in a more digestible manner as well.

Commendation: GVMC's Crash data tool, safety data analysis, and mapping for the 2045 MTP allowed for a data-driven approach for improving safety in the region. Additionally, their incorporation of safety and other performance measures into their MTP is also a noteworthy practice.

Commendation: The Rapid Interurban Transit Partnership's (The Rapid or ITP), the primary public transit provider for the region, innovative partnership with employment centers to recruit disadvantaged populations is an innovative approach to addressing staffing shortages. ITP should continue partnerships with Michigan State University to provide vocational training for the ITP workforce.

Commendation: GVMC's policies and practices document presents their objectives, goals, and performance measures/targets in plain language that is easily understood and applied by those without a technical background. This noteworthy practice helps to integrate performance measures more easily into their overall planning process.

Commendation: GVMC's TIP deficiencies mapping application is an innovative and topical approach. This application allows the MPO to combine technology and data to assess and further improve the transportation network for all users.

Commendation: GVMC makes significant, sustained, and innovative efforts to engage with EJ populations. The MPO's data-driven approach, using GIS mapping software to determine the percentage of projects impacting areas with EJ populations, is an innovative practice. GVMC's use of direct mailings to target EJ populations and residents of multi-family dwellings capitalizes on their data collection efforts, maximizing their outreach efforts.

Commendation: GVMC's use of freight performance measures in their project selection criteria is a noteworthy practice. This ensures increased integration of freight into their planning process. GVMC's robust freight considerations are also evident in their current efforts to develop a regional freight plan.



Recommendations

Recommendation: While the current MOU between MDOT, GVMC, and The Rapid meets federal requirements, the MOU was last updated in 2018. We recommend that MDOT periodically revisit these to ensure that the information doesn't become outdated, and that it is currently signed by active members of all parties.

Recommendation: GVMC has adopted MTPA's methodology for forecasting revenue and cost growth rate. The methodology MTPA uses for forecasting the growth rate is not readily available on MTPA's website and is not detailed in the MTP. We recommended that GVMC provide an explanation of this methodology in their MTP.

Recommendation: GVMC's MTP has an informational section dedicated to innovative financing techniques, such as toll credits, the State Infrastructure Bank (SIB), and Public Private Partnerships (P3). If GVMC is considering the use of innovative financing techniques in future MTPs, we recommend they include an explanation of how these techniques might be pursued, implemented, and how they might benefit overall project delivery.

Recommendation: While the Public Participation Plan (PPP) includes a table evaluating public participation efforts, it doesn't discuss how the MPO did in meeting their stated goals for each public participation tool. Providing a summary of the outcomes in meeting the goals for these tools would help to improve a great product.

Recommendation: We recommend that GVMC develop a virtual public involvement (VPI) strategy and implementation plan as part of the PPP. This VPI strategy can help to increase the response rate from the public and be incorporated into the MTP and TIP development processes.

Recommendation: We recommend that GVMC increase the accessibility and transparency of their website by including clear Title VI contact information and a fillable Title VI complaint form.

Recommendations: As GVMC continues to develop their regional freight plan, we recommend that they increase their knowledge and use of other data sources, such as FHWA's FAF-5 data. This is a freely available dataset and can enhance GVMC's freight planning efforts.



2.0 INTRODUCTION

2.1 Background

Under 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMAs) at least every four years. A TMA is an urbanized area, as defined by the U.S. Census Bureau, with a population of over 200,000. After the 2010 Census, GVMC was among the 183 TMAs designated by the Secretary of Transportation. These TMAs of 179 urbanized areas with a population over 200,000 (such as GVMC for the Grand Rapids area) and four urbanized areas that received special designation. In general, the reviews consist of three primary activities: a site visit, a review of planning products (prior to and during the site visit), and preparation of a certification review report that summarizes the review and issues findings. The reviews focus on compliance with federal regulations, challenges, successes, and experiences of the cooperative relationship between the MPO(s), the State DOT(s), and public transportation operator(s) throughout the metropolitan transportation planning process. Joint FTA/FHWA certification review guidelines provide the federal review team with latitude and flexibility to tailor the review to reflect regional issues and needs. Consequently, the scope and depth of the certification review reports will vary significantly.

The certification review process is one of several methods used to assess the quality of a regional metropolitan transportation planning process, compliance with applicable statutes and regulations, and the level and type of technical assistance needed to enhance the effectiveness of the planning process. Other activities also provide federal agencies with opportunities to review and comment on an MPO's planning process, including approval of the Unified Planning Work Program (UPWP), the Metropolitan Transportation Plan (MTP), metropolitan and statewide transportation improvement program (TIP) findings, air-quality (AQ) conformity determinations in nonattainment and maintenance areas, plus a range of other formal and informal contacts. The results of these processes are considered in the certification review.

While the certification review report itself may not fully document those many intermediate and ongoing checkpoints, the "findings" of the certification review are based upon the cumulative review and findings of the entire planning process.

The review process is tailored to focus on significant topics in each metropolitan planning area. Federal reviewers prepare certification reports to document the results of the review process. The reports and final actions are the joint responsibility of the appropriate FHWA and FTA field offices, and their content will vary to reflect the planning process reviewed, whether they relate explicitly to formal "findings" of the review.



FHWA/FTA will continue to improve the clarity of Certification Review reports to encourage public understanding and input.

2.2 Purpose and Objective

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

The Grand Valley Metropolitan Council (GVMC) is the designated MPO for the Grand Rapids urbanized area. The Michigan Department of Transportation (MDOT) is the responsible State agency, and The Rapid is the responsible public transportation operator. Current membership of GVMC consists of elected officials and citizens from the political jurisdictions in the Grand Rapids metropolitan statistical area. The study area includes all or part of Kent, and Ottawa counties, with the City of Grand Rapids being the largest population center.

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

3.0 SCOPE AND METHODOLOGY

3.1 Review Process

The first certification review for the TMA was conducted in 1996. Subsequent certification reviews were conducted in 1999, 2002, 2006, 2010, 2014 and 2018. A summary of the status of findings from the 2018 review is provided in Appendix B. This report details the 2022 review, which consisted of a virtual site visit and opportunity for public involvement, conducted in June 2022.

Participants in the review included representatives of FHWA, FTA, MDOT, The Rapid, and GVMC staff. A full list of participants is included in Appendix A.

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



The certification review covers the transportation planning process conducted cooperatively by the MPO, State, and public transportation operators. Background information, current status, key findings, and recommendations are summarized in the body of the report. Table 1, below, lists subject areas that were reviewed at each corresponding stage of the overall certification review by the Federal Review Team:

Table 1: GVMC 2022 TMA Certification Review Topics

Certification Topic	Desk Review	Virtual On-Site Review	Findings
Organization, management, and operations	✓	✓	✓
Metropolitan Planning Boundary (MPA)	✓		
Agreements and Contracts	✓	✓	✓
Unified Planning Work Program (UPWP)	✓	✓	
Metropolitan Transportation Plan (MTP)	✓	✓	✓
Financial Planning	✓	✓	
Transit Planning	✓	✓	✓
Air Quality	✓	✓	
Transportation Improvement Plan (TIP)	✓	✓	✓
Public Participation	✓	✓	✓
Self-Certification	✓		
Civil Rights (Title VI/LEP)	✓	✓	✓
Congestion Management Process (CMP)	✓	✓	
Annual Listing	✓		
Environmental Justice	✓	✓	
Consultation	✓	✓	
Safety	✓	✓	
Security	✓		
Freight	✓	✓	✓
Visualization	✓		
Environmental Mitigation	✓	✓	



Travel Demand Model	✓		
Intelligent Transportation Systems (ITS)	✓		
Performance-Based Planning and Programming (PBPP)	✓	✓	

3.2 Documents Reviewed

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

- MDOT/GVMC Planning MOU 2017
- GVMC FY2022 Unified Planning Work Program (UPWP) and draft FY2023 UPWP
- GVMC 2045 Metropolitan Transportation Plan (MTP)
- GVMC FY2020-2023 TIP, GVMC Draft 2023-2026 TIP, and Self-Certification
- GVMC Congestion Management Process Report
- GVMC Draft Freight Plan
- GVMC 2019 Consultation Plan

4.0 PROGRAM REVIEW

4.1 Metropolitan Planning Organization (MPO) Structure, Management, and Operations

4.1.1 Regulatory Basis

23 U.S.C. §134 and 23 CFR §450.310 cover the establishment, organization, and redesignation process of a MPO by agreement between the MPO and the Governor. At a minimum, each MPO that serves a designated TMA shall consist of local elected officials, appropriate state officials, and officials of public agencies that administer or operate major modes of transportation in the metropolitan area. 23 CFR §450.306 covers the scope of the metropolitan transportation planning process. Specifically, 23 CFR §450.306 requires that the planning process be continuous, cooperative, and comprehensive; increase accessibility and mobility of people and freight; support economic vitality of the region; and, among other requirements, address factors that support efficient system management and operation.

4.1.2 Current Status

GVMC was founded in 1990 as the MPO for the Grand Rapids Metropolitan Area. Prior to this, the Grand Rapids and Environs Transportation Study (GRETS) and West Michigan Regional



Planning Commission (WMRPC) had served as the MPO for the Grand Rapids area. GVMC is structured as a council of governments, consisting of representatives from 41 local governments, counties, relevant state officials, and transit operators within the metropolitan planning area. An organizational chart and overview of GVMC's general composition and planning processes are included in Appendix D 'GVMC Organization Overview and Process Charts'.

According to the U.S. Census Bureau's Annual Estimates of the Population of Metropolitan and Micropolitan Statistical Areas, the resident population of the Grand Rapids-Kentwood, MI Metropolitan Statistical Area (MSA) had a population of 1,081,372 as of 2020, with a population growth of 7.3% for the 2011-2020 period. GVMC has a typical MPO structure, consisting of a policy committee comprised of elected representatives of transit operators, local, and county governments; as well as a technical committee comprised of GVMC's professional staff, and professional staff from other member organizations. Additionally, ITP-The Rapid serves as the main public transit operator for the MPO area.

GVMC's overall structure meets their current needs, as well as federal requirements, and is well-staffed based on current workloads and future studies/plans. GVMC's policy and technical committees meet regularly and have recently transitioned to in-person meetings after conducting primarily virtual meetings throughout the COVID-19 Pandemic.

GVMC is currently developing a Regional Transportation Demand Management Plan that is expected to be completed in September 2023. This plan has the potential to greatly improve the efficiency of transportation in the MPA and has a goal of informing other planning products for the region. GVMC should continue to use this innovative, and data-driven approach to maximizing efficiency and services in their area

4.1.3 Findings

Commendation: GVMC prepares a [Transportation Committee Handbook](#), referred to as the Membership Binder, is a valuable reference guide and noteworthy practice. This product helps to integrate new policy board members into their planning process. It does this by providing an overview of the MPO along with responsibilities, explanation of the planning process, and types of funding available. The document is also publicly available, which helps the interested public to better understand the transportation planning process.

Proposed FHWA/FTA Technical Assistance: If GVMC is interested, FHWA can work to set up cost-benefit analysis training for GVMC staff to analyze options for maximizing services using their general fund surplus.



4.2 Agreements and Contracts

4.2.1 Regulatory Basis

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

4.2.2 Current Status

GVMC, The Rapid, and MDOT are presently subject to only two formal documents delineating roles and responsibilities for planning tasks. The first is a Memorandum of Understanding (MOU) that outlines the general roles and responsibilities of each organization for general planning tasks, as required by 23 CFR 450.314(a). The second is a Memorandum of Agreement (MOA) between MDOT and the MPOs in the state that establishes the roles and responsibilities of each for air quality determinations as part of the State Implementation Plan (SIP). The MOU (MDOT NO. 2018-0532) was most recently updated in 2018 to incorporate requirements for Performance Based Planning and Programming. The MOA for conformity determination was last updated in 2016 and is only signed by SEMCOG (another MPO within the state). MDOT, however, considers it applicable for all MPOs subject to conformity determination requirements (such as GVMC).

4.2.3 Findings

Recommendation: While the current MOU between MDOT, GVMC, and The Rapid meets federal requirements, the MOU was last updated in 2018. We recommend that MDOT periodically revisit these to ensure that the information doesn't become outdated, and that it is currently signed by active members of all parties.

4.3 Metropolitan Transportation Plan (MTP)

4.3.1 Regulatory Basis

23 U.S.C. 134(c), (h) & (i) and 23 CFR 450.324 stipulate requirements for the content and development of the MTP. The MTP must address at least a 20-year planning horizon; include long and short-range strategies that develop an integrated and multi-modal transportation system; and, among other things, facilitate the safe and efficient movement of people and goods while addressing current and future transportation demand.



The MTP is required to provide a continuing, cooperative, and comprehensive (C3) multimodal transportation planning process. The plan must consider relevant issues for transportation system development, land use, employment, economic development, the natural environment, housing, and community development.

23 CFR 450.324(c) requires the MPO to update the MTP at least every four years in air quality nonattainment and maintenance areas, and at least every 5 years in attainment areas. This ensures that the MTP reflects current conditions and forecasted transportation, population, land use, employment, congestion, and economic trends.

23 CFR 450.324(f) requires that the MTP, at a minimum, contains the following:

- Current and projected transportation demand
- Existing and proposed transportation facilities
- Description of performance measures and targets used in assessing the transportation system
- System performance report of performance targets
- Operational and management strategies
- Congestion management process
- Capital investment and strategies to preserve transportation infrastructure and provide for multimodal capacity
- Transportation and transit enhancements
- Design concept and design scope descriptions of proposed transportation facilities
- Potential environmental mitigation activities
- A financial plan
- Pedestrian walkway and bicycle transportation facilities

4.3.2 Current Status

GVMC's current MTP, '2045 Metropolitan Transportation', was adopted on 7 May 2020. The plan is overall solidly constructed, fiscally constrained, and meets all federal requirements. The current MTP also contains numerous innovative elements, that are not typically required in MTPs, such as passenger rail, a regional freight plan (the only one in the state), air transportation, and a robust collaboration effort to integrate other regional plans for the area.

GVMC's public participation, outreach, and consultation process for the development of their current MTP warrant specific attention for both their innovative approach, and extensive nature. GVMC focused public involvement at four key development milestones, conducted a comprehensive EJ analysis, and created numerous committees and consultation processes. GVMC, following recommendations from the 2018 certification review, developed alternative engagement techniques for the 2045 MTP, including 'piggy-backing' on community events, pop-up events at Rapid Central Station, direct mailings to areas with EJ populations, and even using



a PR firm to promote feedback. These efforts paid dividends, resulting in over 867 responses to just one public survey on investment priorities. GVMC received an award from the Michigan Transportation Planning Association (MTPA), an association of all MPOs in the state, for their public engagement efforts.

GVMC's MTP extensively incorporates performance measures and targets that fed into their project selection criteria. These efforts helped to create a data-driven approach, with measurable outcomes. As a result, GVMC's staff have also prioritized the active use of the MTP to keep it a "living document".

The financial plan is fiscally constrained, meeting all federal requirements. It also includes a section describing possible innovative financing techniques, with GVMC only using one of the six methods (Advanced Construct). The MTP lists this section as informational but could be improved by discussing how these techniques might be implemented or pursued by GVMC in the future. The financial plan also indicates that local agencies are well-positioned to deliver these projects, as local matches are primarily provided by Act 51 funds. This leaves local agencies only covering less than 7% of local match requirements for each TIP cycle of the MTP.

The MTP contains robust safety considerations/elements. A particularly noteworthy practice is GVMC's use of safety data to create datasets for analyzing trends for the region. Additionally, GVMC developed a GIS-based 'crash data tool' that incorporates safety data with project maps in a user-friendly interface. This allowed GVMC to develop, and subsequently monitor, their own safety targets for the MTP and highlight the importance of these targets in project selection criteria.



Table 2: GVMC MTP Development Timeline

MTP Development Timeline	
MTP Development Step	Month and Year
2015 and 2045 Base Year Socio-Economic Data Developed	August/September 2018
Updated Public Participation Plan (PPP) Approved	November 2018
Travel Demand Model Calibration	April 2019
MTP Development Kickoff*	June 2019
MTP Survey	June – August 2019
Vision Statement, Goals and Objectives Revised and Approved	August/September 2019
Transportation Needs Subcommittees – Need Identification*	September 2019
Deficiency Analysis	September 2019
Financial Analysis	September-October 2019
Deficiencies Approved by Technical and Policy Committees	October 2019
Investment Strategy Developed and Approved	October 2019
Project List Developed and Approved	October-November 2019
Transportation Alternatives Analyzed	October-November 2019
Consultation	November 2019-January 2020
Environmental Justice Analysis	December 2019
Environmental Mitigation Analysis	December 2019
Presentation of Draft MTP	January 2020
Public Comment on Draft Document*	January-March 2020
Committee Approval of MTP*	March-April 2020
GVMC Board Approval of MTP*	May 2020

4.3.3 Findings

Commendation: GVMC’s Crash data tool, safety data analysis, and mapping for the 2045 MTP allowed for a data-driven approach for improving safety in the region. Additionally, their incorporation of safety and other performance measures into their MTP is also a noteworthy practice.

Recommendation: GVMC has adopted MTPA’s methodology for forecasting revenue and cost growth rate. The methodology MTPA uses for forecasting the growth rate is not readily available on the MTPA website and is not detailed in the MTP. We recommended that GVMC provide an explanation of this methodology in their MTP.

Recommendation: GVMC’s MTP has an informational section dedicated to innovative financing techniques, such as toll credits, the State Infrastructure Bank (SIB), and Public Private Partnerships (P3). If GVMC is considering the use of innovative financing techniques in future MTPs, we recommend they include an explanation of how these techniques will be pursued, implemented, and how they might benefit overall project delivery.



Proposed FHWA/FTA Technical Assistance: If GVMC is interested in pursuing innovative financing techniques for future MTPs or TIPs, FHWA can coordinate training of GVMC staff in these techniques and facilitate their implementation with MDOT staff.

4.4 Transit Planning

4.4.1 Regulatory Basis

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

4.4.2 Current Status

The Interurban Transit Partnership (ITP), The Rapid is the primary transit provider, providing transit and paratransit service in the Grand Rapids urbanized area. ITP The Rapid operates traditional fixed-route bus service; demand-response services for low-income, elderly and disabled passengers; and car/vanpool programs. ITP The Rapid is also the designated recipient for FTA formula funding in the region. Below are highlights of the work that has been done since the 2018 certification review. While the list below is not exhaustive, it does capture the breadth of transit planning efforts in the GVMC area.

The Laker Line, a 13.3-mile bus rapid transit (BRT) line between downtown Grand Rapids and the Grand Valley State University (GVSU) campus in Allendale, operating primarily along Fulton Street and Lake Michigan Drive, opened during the pandemic in August 2021. The Laker Line is The Rapid's second Small Start award under FTA's competitive Capital Investment Grant program. The project came in approximately \$10M under budget and FTA approved a portion of the cost savings to implement additional scope, including an additional park-n-ride lot, an additional vehicle, and various enhancements.

Historically, GVMC engaged in land use planning, but no longer has authority to do so. Affordable housing is an issue in the Grand Rapids area and use considerations must be considered with city comprehensive plans to address this.

ITP The Rapid conducted a comprehensive operational analysis (COA) in 2019 to examine the current system and take an in-depth look at the ridership market, operating characteristics, ridership, and growth opportunities. The intent of the COA was to conduct an in-depth analysis of how to maximize the current system. The process was also supplemented by an in-depth outreach process to ensure that recommendations supported local priorities. Published in



March 2021, the COA is intended to serve as a roadmap for the next five years to position the agency for continued financial and operational success. The new system routes were introduced in August 2021, coinciding with the opening of the Laker Line BRT. As a result, The Rapid was able to more effectively allocate limited resources and offer all day service by not using all resources on peak routes.

Key results of the 2021 COA:

Compared to February 2020, The Rapid's increased operational efficiency has resulted in:

- ~136,000 more residents within ¼ mile of 15-minute all-day weekday service
- ~67,0000 more jobs within ¼ mile of 15-minute all-day weekday service
- Over 8,000 jobs in Walker now have transit access
- Over 9,000 jobs in Broadmoor now have better transit access



Table 3: The Rapid Preferred Alternative Frequency Map

Figure ES-4 Preferred Alternative Frequency Map



While ITP service levels and ridership initially decreased during the COVID-19 pandemic, the ITP has incrementally added back service and is now back up to full-service levels. Current ridership is hovering at 50% of pre-pandemic levels as travel patterns and transit usage have been altered by increased telework during the pandemic, but there has been a strong recovery of ridership systemwide. With the current increase in gas prices, ITP continues to compare favorably with other peer systems.



ITP will begin the development of a Transit Master Plan (TMP) in October 2022 and conclude in January 2024 with a scope to maximize coordination efforts. The COA process can be seen as a current assessment of existing conditions, ending with recommendations to optimize services with favorable cost efficiencies and demand propensities. The COA is under two years old, and the TMP will include a review of the COA along with an implementation plan recommending improvements between now and 20 years in the future.

During the certification review it was mentioned that there is a friction point at connections with surrounding communities. However, it appears The Rapid is doing a great job in attempting to resolve this constraint, and hopefully the work of the TMP will strengthen connections. As part of this plan, ITP will analyze the Streetlight Data to better understand travel behaviors and markets. Streetlight Data uses smartphones as sensors to measure vehicle, transit, bike, and foot traffic virtually anywhere. As part of the implementation phase, indicators will be assessed on an annual basis, and course corrections made to keep the 20-year vision moving forward.

In Fall 2021, ITP conducted a Transit Oriented Development (TOD) study, named Division United. Funded by the FTA's Pilot Program for Transit-Oriented Development Planning grant, Division United is a long-range framework plan that seeks to identify specific strategies to improve the quality of life, economic vitality, and long-term character of the South Division corridor by leveraging the Silver Line BRT service as an agent for catalytic investment. GVMC served as a member of the steering committee for this effort. One of the goals of the study was to leverage funding to finance future projects and highlight the benefits of combined housing and transportation development projects in creating a vibrant and livable community.

The Rapid, like many transit agencies across the county, faces persistent driver shortages. The Rapid is working with Michigan State University to deliver vocational training through the state prison system and second chance programs. This innovative program has been successful in both reducing driver shortages, as well as decreasing recidivism rates for participants from 30% to just 3%. The program provides vocational training for commercial driver's licenses (CDL-B) and automotive technicians, with possible expansion to heavy diesel certifications. Additionally, The Rapid uses driver incentive pay to increase employee retention.

The Rapid has been involved with an innovative mobility program with VIA, developing a limited program to successfully launch on-demand service to light industrial areas not easily served with traditional transit.

The Rapid coordinates with several rural transit providers, including Hope Network, Senior Neighbors, Kent County Community Action, and United Methodist Community House and Georgetown Seniors. The Kent County government has also introduced a mobility task force to identify gaps in service for the area. ITP The Rapid coordinates services by dispatching transportation through RideLink. RideLink service is open to anyone over 60 and provides on-



demand transportation to any destination, including shopping, recreation, and medical appointments. The service is paid for by a local millage, and GO!Bus vehicles provide trips for Ridelink.

Go!Bus is ITP The Rapid's paratransit service. It is a shared ride, advanced reservation, ADA paratransit service that is intended to provide a comparable level of transportation service to The Rapid's fixed-route bus service. The Rapid also provides GO!Bus service to non-disabled seniors (NDS) aged 65 and older.

One item to note for GVMC and The Rapid's transit planning process: FTA planning final rule 450.310(d)(ii) requires that transit providers are given representation on an MPO's Board of Directors. While the CEO and professional staff from The Rapid don't sit on GVMC's Board of Directors, this requirement is currently being met through members of the Rapid's governing board sitting on GVMC's Board of Directors. GVMC's enabling statute (Act no. 292 of the Michigan Public Acts of 1989) allows certain local governments to create councils under certain circumstances. This statute also requires that members of these councils be from local units of government and is why The Rapid's professional staff are not included. Additionally, The Rapid staff actively participate on the MPO Policy Committee, which serves as the final decision-making body for the MPO, giving transit operators further representation in the planning process.

4.4.3 Findings

GVMC staff, board members, and ITP The Rapid have very good working relationships that improve the delivery of transportation services to the public. For instance, there is extensive inter-agency coordination with public outreach and sharing of ITP facilities.

Since the last certification review, ITP The Rapid is under new leadership with Deb Prato serving as CEO. Two new public involvement coordinators were also hired, allowing the agency to be more proactive in providing services. The agency also enjoys good longevity from other staff including the Director of Planning and the Grants & Capital Planning Manager. The rapport built between the staff of GVMC and The Rapid organizations is beneficial, and the goals of the MTP are well-aligned with ITP. ITP The Rapid is represented by staff members on the Policy and Technical Committees, and by multiple ITP Board members on the GVMC Board.

MDOT's Office of Passenger Transportation went through a lean process improvement where processes were examined from start to finish by different MDOT departments and outside stakeholders. Staff from GVMC and ITP The Rapid participated and gave insightful feedback throughout the process.

Commendation: The Rapid Interurban Transit Partnership's (The Rapid or ITP), the primary public transit provider for the region, innovative partnership with employment centers to



recruit disadvantaged populations is an innovative approach to addressing staffing shortages. ITP should continue partnerships with Michigan State University to provide vocational training for the ITP workforce.

4.5 Transportation Improvement Program (TIP)

4.5.1 Regulatory Basis

23 U.S.C. 134(c), (h) & (j) set forth requirements for the MPO to cooperatively develop a Transportation Improvement Program (TIP). Under 23 CFR 450.326, the TIP must meet, among others, the following requirements:

- Must cover at least a four-year horizon and be updated at least every four years.
- Surface transportation projects funded under Title 23 U.S.C. or Title 49 U.S.C., except as noted in the regulations, are required to be included in the TIP.
- List project description, cost, funding source, and identification of the agency responsible for carrying out each project.
- Projects need to be consistent with the adopted MTP.
- Must be fiscally constrained.
- The MPO must provide all interested parties with a reasonable opportunity to comment on the proposed TIP.

4.5.2 Current Status

At the time of the certification review, GVMC's current TIP covered FY2020-2023 and was approved 26 September 2019. Following the on-site visit, a FY2023-2026 TIP was adopted 2 June 2022. Since this new TIP has been adopted prior to writing this report, the discussion will focus on the present FY2023-2026 TIP. Overall, the TIP is fiscally constrained, logically constructed, and meets all federal requirements.

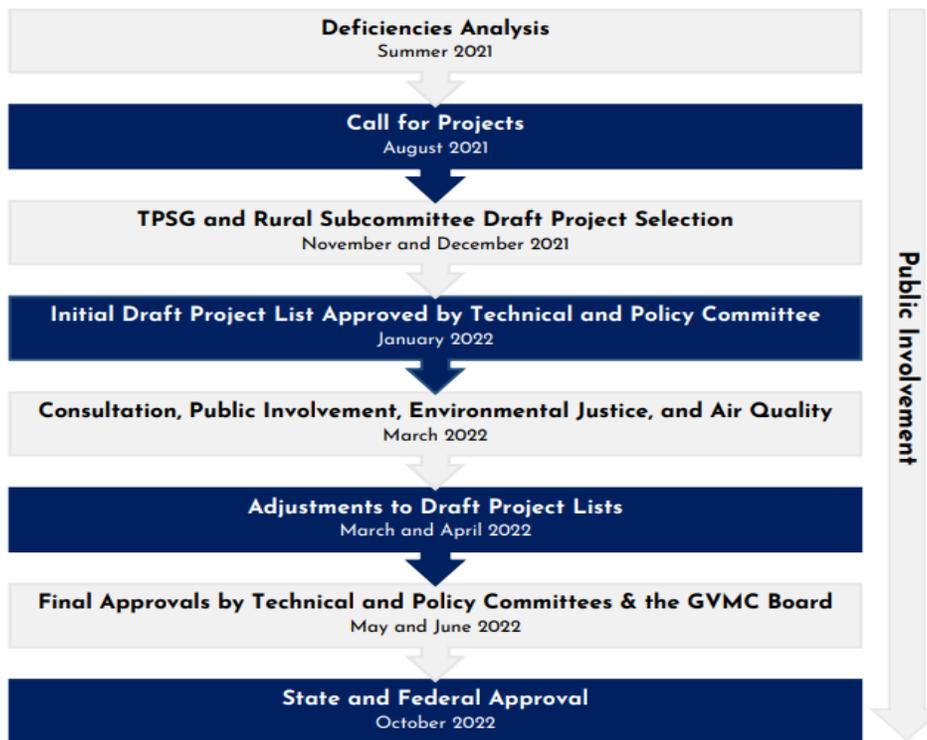
GVMC began the TIP development process in August 2021, lasting about 9 months in total. As with their overall MTP, GVMC's public outreach and stakeholder engagement for the TIP was very strong. GVMC incorporated multiple alternative engagement processes due to the ongoing pandemic, including social and print media, postcard mailings, email, flyers, targeted EJ outreach, and virtual and in-person open houses. GVMC also coordinated these efforts with adjacent MPOs, outside of their area, to coordinate the TIP development process and enhance the interconnectivity of the regional transportation network. As part of the consultation process, MDOT meets with GVMC after the draft project list has been developed to gather input prior to taking the TIP through their committees. This heads off any issues early, and greatly increases the efficiency and timeliness of the TIP development process.



Some particularly noteworthy practices that GVMC uses in their TIP development is their deficiency analysis, incorporation of performance targets, and TIP mapping efforts. GVMC’s deficiency analysis incorporated data from diverse sources, such as the travel demand model, PASER data, safety data, and regional ITS data to produce a detailed and thorough list identified issues. In their call for projects, GVMC solicited feedback from local agencies on the identified issue areas, while also analyzing potential impacts to EJ populations or freight/economic benefits. The MPO staff then developed a policies and practices document that outlined their regional goals, objectives, and performance targets, using this as a lens to incorporate performance targets and measures into the project selection criteria. Once the draft project list was created, GVMC then developed a user-friendly GIS combined overlay map of proposed projects, identified deficiencies, EJ areas, and performance measures/targets to relate how the proposed projects would service needs and produce results for the area. These innovative practices greatly help to improve the efficiency of the TIP development process, while also integrating data to target improvements that would improve the local transportation network.

Amendments to the TIP process, like other MPOs in the state, use the state’s JobNet system to enter data and ensure proper procedures are followed for each iteration. GVMC also makes extensive use of illustrative needs lists to accompany the TIP for both motorized and non-motorized transportation alternatives. While not required, this is a good practice that makes the process of adding new projects to the TIP if funding becomes available more efficient.

Table 4: GVMC FY 2023-2026 TIP Development Process





4.5.3 Findings

Commendation: GVMC’s policies and practices document presents their objectives, goals, and performance measures/targets in plain language that is easily understood and applied by those without a technical background. This noteworthy practice helps to integrate performance measures more easily into their overall planning process.

Commendation: GVMC’s TIP deficiencies mapping application is a highly innovative and topical approach. The application allows the MPO to combine technology and data to assess and further improve the transportation network for all users.

4.6 Public Participation

4.6.1 Regulatory Basis

23 USC. §134 and 49 USC. §5303 require an MPO to provide adequate opportunity for the public to participate in and comment on the planning process and planning/policy documents produced by the MPO. The requirements for public involvement in the transportation planning process are detailed in 23 CFR 450.316. The MPO is required to develop and use a documented participation plan that contains explicit procedures and strategies for involving the public and other interested parties in the transportation planning process.

Federal planning regulations per 23 CFR 450.316 further define specific activities that the MPO must conduct, including:

- making public information available in electronically accessible formats.
- demonstrating explicit consideration and response to public input received during the development of the MTP and the TIP,
- seeking and considering the needs of those traditionally underserved, such as low-income and minority households.
- providing an additional opportunity for public comment if the final MTP or TIP differs significantly from the version that was made available for public comment by the MPO, or raises new material issues that interested parties could not have reasonably foreseen from public involvement efforts,
- periodically reviewing the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process, and
- consult with agencies and officials responsible for other planning activities within the MPO area that are affected by transportation.



4.6.2 Current Status

The GVMC Public Participation Plan (PPP) was last updated in July 2021. The PPP was developed in consultation with the residents and organizations on GVMC's consultation list. This list includes over 180 organizations and 2,500 individuals with representation ranging from minority groups, low socio-economic status groups, the elderly, persons with disabilities, Native American tribes, ethnic/cultural groups, transportation agencies, and neighborhood associations. The PPP effectively describes how GVMC incorporates public involvement in their transportation planning process. The PPP also includes specific milestones and procedures for the development of the Metropolitan Transportation Plan (MTP), Transportation Improvement Program (TIP), and PPP. During the development of the 2045 MTP and the FY2020-2023 TIP, GVMC effectively used newspaper and radio ads to notify traditionally underserved communities of MPO committee meetings. GVMC added the development of the Unified Planning Work Program (UPWP) to their list of documents for public outreach. Additionally, the MPO attended various community events and used these as part of their outreach efforts.

GVMC has developed an effective tool for evaluating and measuring the impact of their public participation efforts in the region. The MPO has created a public participation tool evaluation table in their PPP that describes the methods that GVMC uses to evaluate each of tools they've used for public outreach, allowing them to better analyze and adapt their public participation strategy.

GVMC partnered with the local transit agency, The Rapid, to enhance their public involvement outreach activities, and conducted an evaluation of their public involvement strategies to determine their effectiveness.

GVMC makes adequate attempts to hold committee meetings at accessible locations/times and on transit routes to ensure there is opportunity for the public to comment on the transportation planning process.

GVMC conducted an analysis of the efficacy of its public engagement strategies and tools prior to the development of the MTP and TIP to determine if any changes were warranted. GVMC primarily relied on surveys and direct mailings for public input during the development of the MTP and TIP. Notably, the MPO is very proactive in going out into the community to engage the public. GVMC attends numerous community events to obtain public input on their planning documents, such as family fun day, the farmer's market, concerts, minor league baseball games, and other neighborhood events.

GVMC coordinates with MDOT on public involvement activities such as the development of the State Long-range Transportation Plan, Statewide Transportation Improvement Program, and the Five-Year Program.



GVMC has an excellent relationship with the local transit operator (The Rapid). The MPO coordinates with The Rapid to use space at their facilities to hold more accessible public meetings, set up displays at transit locations, and to conduct public surveys. GVMC also shares their mailing list with The Rapid and cross-post notices on social media platforms.

GVMC has partnered with LINC UP, a community development organization and seeks to build partnerships with other agencies to inform the public about opportunities to become involved in the transportation planning process.

During the COVID-19 pandemic, GVMC held virtual public meetings using the Zoom platform. The MPO reported that they had better attendance from the committee members at virtual meetings, however, not necessarily better attendance from the public. The MPO admitted that they believe one of the reasons they did not see better attendance from the public was because the meetings were held during the weekday.

GVMC regularly evaluates its public engagement activities and prepares summary reports of its public outreach strategies and tools. This allows the MPO to better analyze what actions they took, and the number of people they were able to reach.

4.6.3 Findings

Recommendation: While the PPP includes a table evaluating public participation efforts, it doesn't discuss how the MPO did in meeting their goals for each public participation tool used. Providing a summary of the tools used, outcomes, and how these assisted in meeting public participation goals would help to improve a great product.

Recommendation: We recommend that GVMC develops a virtual public involvement (VPI) strategy and implementation plan as part of the PPP. This VPI strategy can help to increase the response rate from the public and be incorporated into the MTP and TIP development processes.

Proposed FHWA/FTA Technical Assistance: Federal partners can assist GVMC in public participation by providing training and resources on best practices for public outreach, such as the [Transportation Planning Capacity Building Public Involvement Resources](#), [Peer Exchanges](#), [EDC-6 VPI](#), and [EDC-6 Progress Report](#).

4.7 Civil Rights (Title VI, EJ, LEP, ADA)

4.7.1 Regulatory Basis

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



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

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

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

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

Executive Order (EO) 14008, “Tackling the Climate Crisis at Home and Abroad” created a government wide policy, the Justice40 Initiative, that aims to deliver 40 percent of the overall benefits of relevant federal investments to disadvantaged communities. Justice40 also requires Executive agencies, such as the U.S. Department of Transportation (USDOT) to develop a methodology for identifying disadvantaged communities and benefits of programs subject to Justice40. These methodologies must be consistent with guidance from the Office of Management and Budget (OMB) and relevant statutory authorities.



The Justice40 Initiative is also aligned with the goals of EO 13985, “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government,” and will be implemented as part of the USDOT’s broader equity agenda.

4.7.2 Current Status

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

The federal review team reviewed the MPO’s Title VI Report and found it to be consistent with federal requirements. The document summarizes several of the MPO’s required documents, including the TIP, MTP, UPWP, and the PPP. It discusses the MPO’s efforts on LEP, ADA, EJ, and other topics.

The GVMC Title VI Plan lists the human resources administrator as the GVMC Title VI coordinator and EEO Officer. This position is also responsible for the effective implementation of the plan, as well as compliance with equal employment requirements. The GVMC staff directory, however, doesn’t mention Title VI or EEO in employee descriptions. Since staff directories are more likely to be accessed by the public than the Title VI Plan, this might make it more difficult for the public and others to know the correct point of contact for Civil Rights and Title VI matters.

The current Title VI complaint form is a non-fillable form in the appendix of the GVMC Title VI Plan. This might make it difficult for members of the public to access who are less familiar with GVMC’s planning documents or might not have immediate access to a printer or scanner. Making the form a fillable PDF and placing it as a stand-alone document on the GVMC website could address this issue.

Limited English Proficiency (LEP)

The GVMC website contains a “translate” widget that allows the site to be translated into 108 different languages. This is an innovative and helpful feature for the website, and while limitations exist on the accuracy of automatic translation software, this helps to reduce barriers without placing constraints on limited resources. It is worth noting, however, that this feature only works for the website itself, and not any uploaded documents. Perhaps links to freely available translation software can be included on the “landing pages” where these documents are posted.

Another way that GVMC can improve services to LEP customers is to create a document providing an overview of the MPO and executive summaries of major planning documents (such as the TIP, MTP, and PPP) in all Safe Harbor languages identified in the LEP.

Americans with Disabilities Act of 1990 requirements (ADA)



The Title VI Plan and PPP reference the region’s population living with disabilities, making note of Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act of 1990. Neither plan, however, includes reference to specific accommodations that can be made for residents that might require additional accommodations such as plain text, large print, braille, Communication Assisted Real Time Translation (CART), and assisted listening devices. Including additional information related to ADA and accessibility will help to reduce barriers that disabled residents might face in participating in the transportation planning process.

Environmental Justice (EJ)

The most recently designated EJ areas in the region were developed for the FY2023-2026 TIP using block group geography and the 2019 5-year ACS estimates (2020 data was not available at the time). Once the 2020 Decennial Census data are available, this information can be updated to provide more accurate estimates.

As a noteworthy practice, GVMC currently uses GIS mapping tools to tailor public engagement for EJ populations, which helps to ensure more inclusive and effective project selection for the MTP and TIP. As the requirements and implementation of the Justice40 continue to evolve, this can be considered a best practice for other MPOs to emulate.

4.7.3 Findings

Commendation: GVMC makes significant, sustained, and innovative efforts to engage with EJ populations. Their data-driven approach uses GIS mapping software to determine the percentage of projects impacting areas with EJ populations. GVMC capitalizes on this practice using direct mailings to target outreach toward EJ populations and residents of multi-family dwellings, which are historically underrepresented.

Recommendation: We recommend that GVMC increase the accessibility and transparency of their website by including clear Title VI contact information and a fillable Title VI complaint form.

Proposed FHWA/FTA Technical Assistance: Federal partners can assist GVMC in this area by providing training and technical assistance on newer Executive Orders such as [EO 14008](#) and [EO 13985](#).

4.8 Freight Planning

4.8.1 Regulatory Basis

The MAP-21 established in 23 U.S.C. 167 a policy to improve the condition and performance of the national freight network and achieve goals related to economic competitiveness and



efficiency; congestion; productivity; safety, security, and resilience of freight movement; infrastructure condition; use of advanced technology; performance, innovation, competition, and accountability, while reducing environmental impacts.

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

4.8.2 Current Status

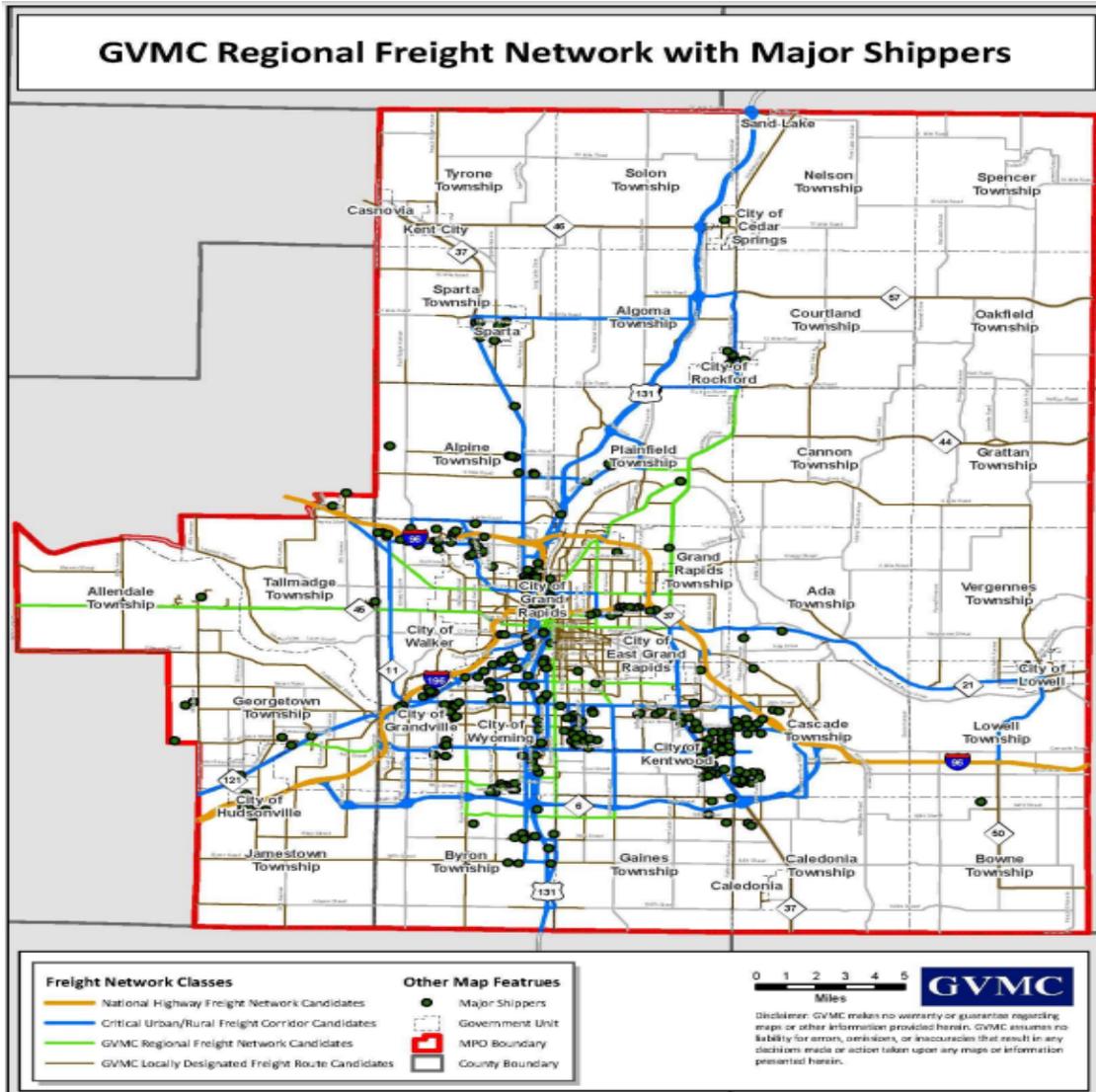
Currently, GVMC is developing the first regional freight plan in the state of Michigan. While this effort is in development, and thus outside the scope of this review, it illustrates the importance that GVMC staff have placed on freight, and their commitment to economic development in the region and state. GVMC staff contributed to the development of the integrated state long-range/freight plan, the first of its kind, though participating in freight workshops hosted by MDOT. GVMC's MTP, as a result, contains an in-depth analysis of freight issues, proposed solutions, and economic impacts for the region. During the deficiency analysis for their MTP, GVMC created an overlay of major employers/shippers in the area for their congestion deficient segments from their transportation demand model. This allowed staff to better assess which projects would help reduce bottlenecks and improve freight efficiency for the area.

For their current TIP, GVMC also has added a weight to their project selection criteria for projects with an expected freight benefit. GVMC sets and assesses freight performance targets based on Truck Travel Time Reliability (TTTR) Index. GVMC also developed and maintains a regional freight council to solicit stakeholder input as a component of their freight planning efforts.

To aid in their efforts to develop a regional freight plan, GVMC has conducted a comprehensive freight survey, participated in the West Michigan Competitiveness in Transportation Study, and the Grand Rapids Chamber of Commerce Logistics Study. GVMC does, however, face a significant constraint in using freight as a driver of economic growth due to their proximity to Chicago.



Table 5: GVMC Regional Freight Network with Major Freight Shippers



4.8.3 Findings

Commendation: GVMC's use of freight performance measures in their project selection criteria is a noteworthy practice. This ensures increased integration of freight into their planning process. Their robust freight considerations are also evident in their current efforts to develop a regional freight plan.

Recommendation: As GVMC continues to develop their regional freight plan, we recommend that they increase their knowledge and use of other data sources, such as FHWA's FAF-5 data. This is a freely available dataset and can enhance GVMC's freight planning efforts.



Proposed FHWA/FTA Technical Assistance: Training for GVMC staff on use of FAF-5 data, as well as freight planning “best practices” of other MPOs with regional freight plans.

5.0 CONCLUSION

The FHWA and FTA review found that the metropolitan transportation planning process conducted in the Grand Rapids metropolitan area meets Federal planning requirements.



APPENDIX A - PARTICIPANTS

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

- Andrew Sibold, FHWA MI Division
- Christina Ignasiak, FHWA MI Division
- PaHoua Schroeder, FHWA MI Division
- Susan Weber, FTA Region 5
- Jocelyn Johnson, FTA Region 5
- Victor Austin, FTA Headquarters
- Laurel Joseph Director of Transportation Planning, GVMC MPO
- Terry Schweitzer, GVMC Policy Board Member (Kentwood)
- George Yang, GVMC
- Andrea Faber, GVMC
- Michael Zonyk, GVMC
- Bradley Doane, GVMC
- Mara Gericke, GVMC
- Craig Newell, MDOT
- Don Mayle, MDOT
- John Lanum, MDOT
- Brad Sharlow, MDOT
- Luke Walters, MDOT
- Jeff Franklin, MDOT
- Tyler Kent, MDOT
- Sam Korson, MDOT
- Maxwell Gierman, MDOT
- Robert Maffeo, MDOT
- Ryan Gladding, MDOT
- Michele Fedorowicz, MDOT
- Nicholas Jasinski, MDOT
- Lindsey Dowswell
- Daniela Khavajian, MDOT
- Kevin Wisselink, The Rapid
- Deb Prato, The Rapid
- Nick Monoyios, The Rapid



APPENDIX B - STATUS OF FINDINGS FROM 2018 CERT REVIEW

One of the priorities of each certification review is assessing how well the planning partners in the area have addressed corrective actions and recommendations from the previous certification review. This section identifies the commendations and recommendations from the previous certification and summarizes discussions of how they have been addressed.

Commendation 1: Performance-Based Planning and Programming: MDOT is commended for its leadership and coordination with the Michigan MPOs, public transportation providers, and rural areas on PBPP, including interagency work groups, monthly meetings, presentations, and newsletters.

Commendation 2: Travel Demand Model: GVMC is commended for cooperating with MDOT and expanding their regional modeling capabilities, including time-of-day analysis and multiple modes of travel. These improvements will help staff provide more accurate and responsive multi-modal information to the public and their members.

Commendation 3: GIS Interactive TIP Project Map: GVMC is commended for developing an interactive TIP Project Map for public involvement as part of their overall website update. This resource makes it easier for the public, and utilities, to locate and comment upon planned transportation projects.

Commendation 4: Accessibility Analysis: GVMC is commended for undertaking an accessibility analysis that is comprehensive and yet simple enough to be replicated by other similarly sized MPOs with geographic information system (GIS) capabilities. GVMC is encouraged to utilize their Accessibility Analysis as part of the EJ analysis during the development of the next MTP.

Recommendation 1: Public Participation: It is recommended GVMC update the public participation planning process to address the following:

- The addition of alternative engagement procedures for the development of major planning products, including reaching out to the public by attending neighborhood meetings and other local events instead of drawing them to traditional public meetings.
- Work with the Interurban Transit Partnership (ITP) to mutually enhance the public distribution of information including sharing mail and email lists, expanding social



- media following by sharing information across websites, advertising at each other's venues, making joint announcements between the two agencies, and holding meetings and outreach events at the Rapid Central Station.
- Expand the discussion of EJ outreach strategies to add specific strategies to more effectively and proactively address EJ populations, specifically in the planning process. Accordingly, it would then be beneficial to add a measure of effectiveness that monitors the number of opportunities for engagement provided to EJ populations.
 - Add the development and amendment of the UPWP as a milestone in the Public Participation Plan.
 - Consider coordinating with FHWA/FTA on a public participation peer exchange.

GVMC has addressed the recommendation on public participation in the following ways:

- developed Alternative engagement procedures including community events and pop-up events at Rapid Central Station;
- moved tech/policy meetings to Rapid Central Station for more space;
- established cross-sharing relationship with ITP, LincUp, and MDOT;
- shift to open house-style meeting for FY23-26 TIP;
- expanded hybrid/virtual engagement options;
- measure of effectiveness for EJ direct mailing;
- development and amendment of UPWP milestones in PPP;
- shifted public involvement and consultation notices from mail to email format in the fall of 2018;
- merged ITP's electronic mailing list with our public involvement list;
- attended public involvement conference in MN in May and numerous additional webinars; and
- worked with a PR firm during the development of our MTP

Recommendation 2: Performance-Based Planning and Programming: It is recommended GVMC, MDOT and the ITP:

- Periodically evaluate the April 3, 2018 memorandum of understanding to ensure the specific written provisions in Article 13 are appropriate, clear, effective, and agreeable.
- Continue looking for opportunities to link investment priorities to performance targets through the MPO's deficiency analyses, and project prioritization and selection processes.



- Continue looking for opportunities to integrate the goals, objectives, performance measures, and targets described in each agency's transportation plans and processes. Including, but not limited to: the state asset management plan for the National Highway System. Transit Asset Management Plan, Highway Safety Improvement Program, Strategic Highway Safety Plan, Public Transportation Agency Safety Plan, State Freight Plan, and Congestion Management Process.

GVMC has addressed the recommendation in the following way(s):

GVMC has incorporated PBPP through extensive TIP deficiencies analysis through their mapping application; developing a policies and practices for programming projects document to align deficiencies with federal performance measures/targets; created and implemented a HIP project proposal form for local agencies; and developed a TIP programming spreadsheet to incorporate federal performance measures, along with other information, for project locations that will be used during project evaluation.

Recommendation 3: Metropolitan Transportation Plan: It is recommended that GVMC:

- Refine the goals and objectives of the next MTP to better align with national performance measures and better relate these goals and objectives to the policies and practices for programming projects.
- Continue exploring new and innovative formatting ideas for the MTP, including a story map.
- Encourage staff participation in the upcoming air quality conformity training in January 2019 and work with MDOT for guidance on air quality conformity modeling.
- Review the resource agency consultation materials provided by FHWA and MDOT to develop and document a formal consultation process similar in nature to the GVMC Public Participation Plan. Such a document would list the resource agency comment period specifications, how the MPO will review consulting agency plans and programs, and how the MPO will respond to or consider comments received.
- Pursue assistance from MDOT in the development of a regional freight plan and participate in the update of the State Long Range Transportation Plan, which will integrate the State Freight Plan and State Freight Investment Plan.

GVMC has addressed the recommendation in the following way(s):

GVMC's 2045 MTP addressed these recommendations by incorporating: refined goals and objectives; an updated format; participation in air quality training for staff; developed and documented a formal consultation process in their new consultation plan; and completed significant work towards developing a regional freight plan.

Recommendation 4: Congestion Management Process: It is recommended MDOT reviews and updates the "Regional ITS Architecture and Development Plan" as needed.

GVMC has addressed the recommendation in the following way(s):



GVMC participated in an update to the Regional ITS Architecture and Deployment Plan.

Recommendation 5: Public Transit-Human Services Transportation Plan: It is recommended GVMC becomes more familiar with the coordinated transit plan and how it is incorporated into the overall transportation planning process.

GVMC has addressed the recommendation in the following way(s):

GVMC plays an active role in participating in the current update process, as well as assisting The Rapid in developing their transit master plan.

Recommendation 6: Transit Performance Targets: GVMC should continue working with ITP-The Rapid to develop and clearly identify performance targets in planning documents. These targets should tie into the national goals and performance measures established by the USDOT.

GVMC has addressed the recommendation in the following way(s):

GVMC has enhanced coordination with The Rapid and other transit agencies regarding targets.

Recommendation 7: Transportation Improvement Program Project Prioritization: It is recommended GVMC further develop the TIP project prioritization process to include performance measures data and relate investments to MTP goals and objectives.

GVMC has addressed the recommendation in the following way(s):

GVMC has developed a documented TIP project prioritization process in their FY2023-FY2026 TIP. This process calculates project priorities based on weighted measures, crash data, and other factors such as freight.

Recommendation 8: Environmental Justice and Title VI: It is recommended GVMC reinstate EJ information included in the 2035 MTP. Specifically, tables documenting projects touching each EJ area, as well as individualized maps for each of the minority groups and low-income areas. It is also recommended GVMC consider incorporating information about the PPP process into the Title VI Plan to link the two documents.

GVMC has addressed the recommendation in the following way(s):

GVMC has reinstated EJ information included in the 2035 MTP and expanded upon it through their EJ mapping application.



APPENDIX C – PUBLIC COMMENTS

No direct public comments were received by FHWA or FTA during the solicitation period, despite extensive advertisement.

GVMC did conduct a virtual survey that yielded public comment, the questions and answers to which the public responded are included below:

Q: I feel that the transportation planning process in the Grand Rapids area could be improved in the following ways

A: It is hard to know what the jurisdiction of certain roads is when reporting problems or trying to get improvements made.

A: I think pedestrian access needs to be emphasized in ways that aren't only about infrastructure. For instance, thinking about benches, shade, and laws (and enforcement) against sprinklers blocking sidewalks (a big problem when underground sprinkling companies install systems so that they spray across sidewalks, forcing people to walk into the road).

A: Engagement of people outside the core municipal decision makers seems minimal - especially at public meetings.

A: Continue to seek out better ways to reach out for feedback from all sectors of the community.

A: Greater awareness for residents. Maybe a letter to residents to let residents know GVMC exists, let alone transportation planning aspects.

A: Complete Streets, Be pioneers! Get in the news by using more sustainable materials and energy saving materials! Get in the news for making biking, mass transit, and walking more accessible and safe! Prioritize pedestrians again. main streets are NOT safe to even cross. (East Fulton, Michigan, Plymouth is now becoming too busy, Fuller is supposed to be 25mph and NO ONE goes 25mph, Wealthy and Diamond area becoming very urban)

Q: What do you feel works well in the transportation planning process in the Grand Rapids area?

A: The collaboration of the partner members is outstanding. West Michigan does an outstanding job of working as a team.

A: I get the emails from GVMC and like that there are surveys for the public to take.



A: Unknown, I just learned about GVMC after sending an email to my local city asking about the SS4A grants.

A: Equitable distribution of transportation \$ for road projects via the TIP
I've seen more and better bike lanes, free Michigan St. bus line, roads seem to be repaired at a better rate, there are better access to bike trails.

A: The collaboration amongst the member agencies is extraordinary. The committee structure and policies are very rich in detail and very open and fair in the equitable distribution of state and federal funding to build, maintain and sustain the transportation infrastructure and services in West Michigan. The services provided by GVMC include an evolving process of public engagement in their efforts to provide a voice for all those living in the area. In addition, long range and short-range study and analyses of general and specific transportation and land use issues continues to guide the decisions to invest in the area.

A: The environment is always very inclusive of all comments. Collaboration between neighboring jurisdictions is common. Appreciate donuts and coffee at most meetings. :)

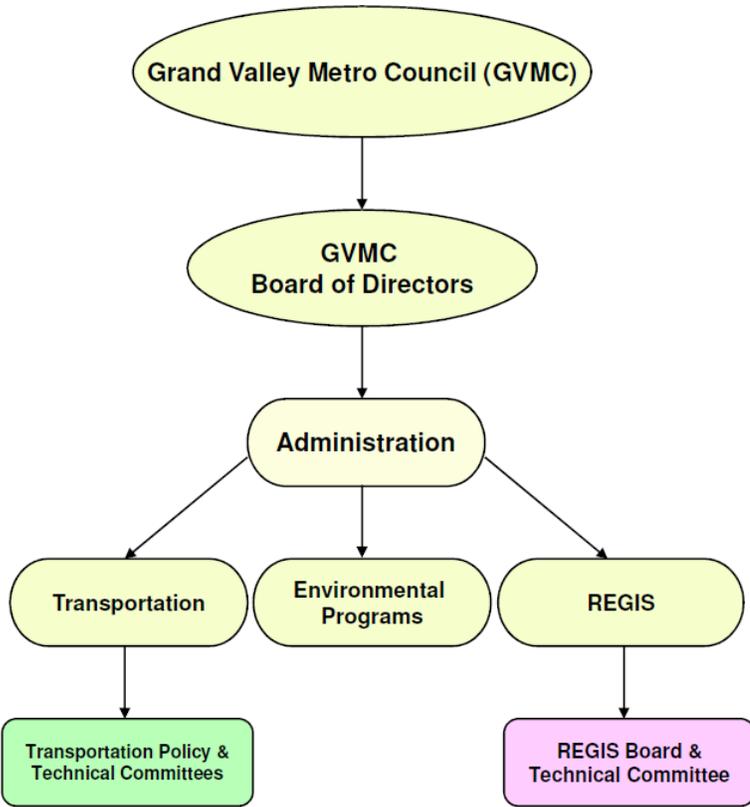


APPENDIX D - LIST OF ACRONYMS

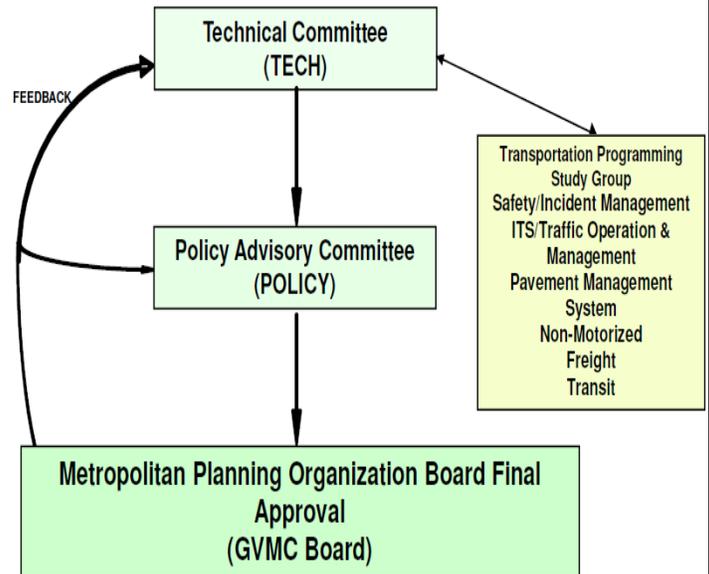
ADA: Americans with Disabilities Act
AMPO: Association of Metropolitan Planning Organizations
BIL: Bipartisan Infrastructure Law
CAA: Clean Air Act
CFR: Code of Federal Regulations
CMP: Congestion Management Process
CO: Carbon Monoxide
DOT: Department of Transportation
EJ: Environmental Justice
FAST: Fixing America's Surface Transportation Act
FHWA: Federal Highway Administration
FTA: Federal Transit Administration
FY: Fiscal Year
GVMC: Grand Valley Metropolitan Council
HSIP: Highway Safety Improvement Program
ITS: Intelligent Transportation Systems
IJA: Infrastructure Investment and Jobs Act (see BIL)
LEP: Limited-English-Proficiency
M&O: Management and Operations
MAP-21: Moving Ahead for Progress in the 21st Century
MDOT: Michigan Department of Transportation
MPA: Metropolitan Planning Area
MPO: Metropolitan Planning Organization
MTP: Metropolitan Transportation Plan
NAAQS: National Ambient Air Quality Standards
NO₂: Nitrogen Dioxide
O₃: Ozone
PM₁₀ and PM_{2.5}: Particulate Matter
SHSP: Strategic Highway Safety Plan
STIP: State Transportation Improvement Program
TDM: Travel Demand Management
TIP: Transportation Improvement Program
TMA: Transportation Management Area
U.S.C.: United States Code
UPWP: Unified Planning Work Program
USDOT: United States Department of Transportation

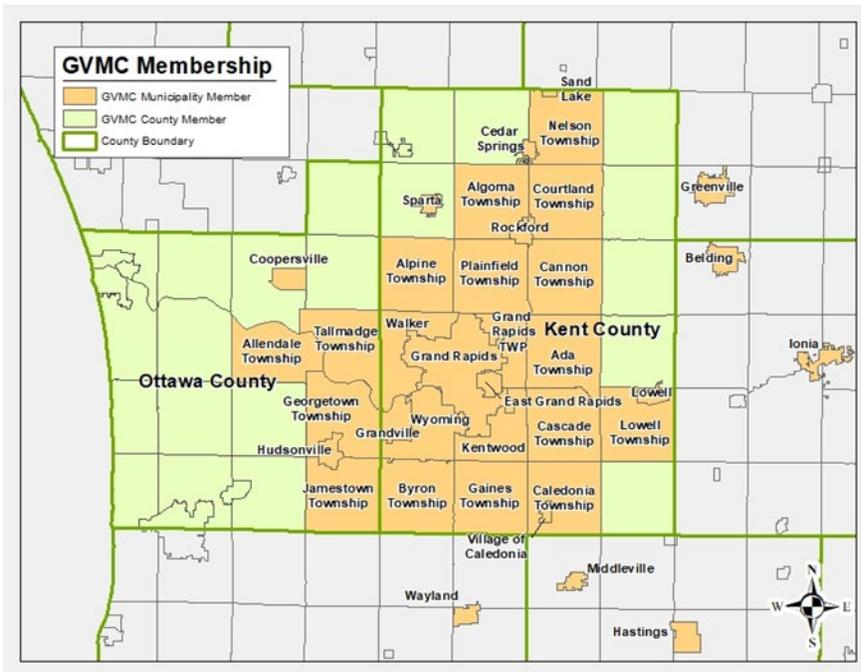
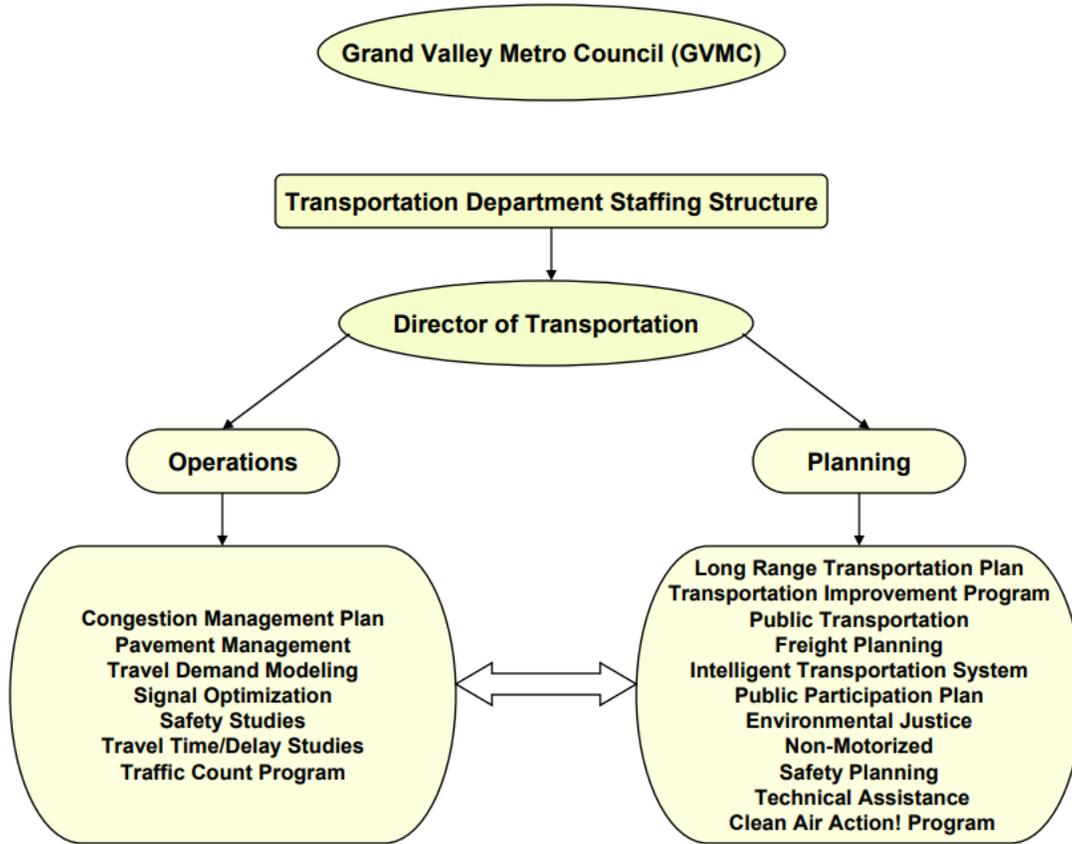
APPENDIX E – GVMC Organization Overview and Process Charts

GVMC Organizational Structure



GVMC Existing Transportation Committees Structure





Source: GVMC website [GVMC Structure — Grand Valley Metro Council](#)



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