



U.S. Department
of Transportation

Transportation Management Area Planning Certification Review

Federal Highway
Administration

Federal Transit
Administration

MINNEAPOLIS – ST. PAUL METROPOLITAN COUNCIL



March 2025
Summary Report





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1.0 EXECUTIVE SUMMARY

On November 13-14, 2024, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted the certification review of the transportation planning process for the Minneapolis – St. Paul, MN urbanized area. FHWA and FTA are required to jointly review and evaluate the transportation planning process for each urbanized area over 200,000 in population at least every four years to determine if the process meets the Federal planning requirements.

The federal planning requirements are defined in Chapter 134 of Title 23 of the United States Code (USC) and Part 450 of Title 23 of the Code of Federal Regulations (CFR).

The 2024 certification review used a risk-based approach to identify focus areas. Based on the review's outcome, FHWA and FTA could issue one of three actions for each focus area: a commendation, recommendation, or corrective action.

Key definitions used throughout this report are defined below:

- **Current Status and Findings:** Statements of fact, interpretations and conclusions regarding the conditions found during the review. These statements provide the primary basis for determining the federal actions (commendations, recommendations, or corrective actions), if any, contained in the report.
- **Commendations:** Best practices that demonstrate innovative, highly effective, well-thought-out procedures for implementing the planning requirements. Procedures addressing issues that have frequently posed problems nationwide could be cited as noteworthy practices. Commendations may also be cited for significant improvements and/or resolution of past findings.
- **Recommendation:** Procedures that could improve regulatory compliance and/or represent best planning practices. While recommendations are somewhat less substantial than a corrective action, they are significant. FHWA and FTA hope that the relevant planning partners will implement them accordingly.
- **Corrective Action:** Practices that fail to meet requirements identified in the transportation statutes and regulations, and seriously impacting the outcome of the overall process. The report clearly defines the expected changes and timelines for resolution.

1.1 Previous Findings and Disposition

The first certification review for the Minneapolis – St. Paul urbanized area was conducted in 1992. Since then, FHWA and FTA have completed certification reviews every four years, with the last review taking place in 2020. The 2020 review findings and their status are listed in Appendix B and summarized in Table 1.



Table 1: 2020 Certification Review Findings and Status

2020 Finding	2020 Action	2020 Recommended Steps	2024 Status Update
The process for developing the UPWP is not documented.	Recommendation	Clarify and document the UPWP development process related to internal processes and how projects are selected.	Starting with the 2022 UPWP, the UPWP now includes language describing how projects are selected in appendix C.
The UPWP does not clarify terms/processes or when a project name changes.	Recommendation	Clarify and provide consistency in terminology used: <ul style="list-style-type: none"> • Provide examples of the types of funds used as local overmatch funds and describe how those local overmatch funds are used. • Provide consistency in UPWP study names. • Clarify what consultant start dates mean. 	Starting with the 2022 UPWP, the document includes the following: <ul style="list-style-type: none"> • The source of non-federal funds. • Statement clarifying that the federal funds and required match is spent prior to any overmatch. • Identification of any study names that have changed. • The study start date, total project budget and budget for the given year
The scope and cost of consultant projects listed in the UPWP are subject to change.	Recommendation	Provide improved estimates of consultant project costs and work with MnDOT to determine when an amendment is needed if changes occur to the scope/cost of consultant projects identified in the UPWP.	The UPWP includes an estimated total and annual budget for new consultant studies, with some instances of a range to allow for potential additional tasks. The Council requires all consultant studies to include an Individual Cost Estimate (ICE) prior to advertisement. The ICE assists project managers in determining a budget based upon tasks within the scope of work. The Council's Procurement office instituted a number of changes that improves coordination with MnDOT on changes in project scope and cost.
The UPWP project name is not consistent between the UPWP and the MTP work program.	Recommendation	Provide a clear link between the UPWP project name and MTP work program study when applicable. Clarify when a MTP work program study name changes from one MTP update to the next update.	The 2050 TPP work program names are consistent with the UPWPs. Any change will be noted within the UPWP description.



2020 Finding	2020 Action	2020 Recommended Steps	2024 Status Update
The Council does not have a written agreement identifying responsibilities in carrying out the metropolitan planning process with transit providers.	Recommendation	Execute a written agreement with all public transit providers that formalizes their role in the planning process.	Written agreement finalized in 2022.
The Council must improve coordination with all transit providers.	Recommendation	Work with all public transit providers to establish a regular meeting schedule to discuss activities related to transit in the planning process within the region.	The Council established the Transit Planning Working Group in 2021, which meets bi-monthly. MOU and purpose sent to FHWA
The Council must improve coordination with all transit providers.	Recommendation	Update the Council's website so that information on all public transit providers is more prominently displayed.	The website was updated in September 2021.
The TIP financial plan does not provide the process for determining the allocation of federal funds among the area transit providers.	Recommendation	Clarify how funds are distributed among the regional transit providers.	With the 2021-2024 TIP, the document included a brief description of the process. The website was updated to outline principles and process for allocating federal funds amongst area transit providers.
A periodic evaluation of the Public Participation Plan (PPP) is required. The PPP metrics need updating.	Recommendation	Evaluate the effectiveness of the procedures and strategies identified in the PPP to ensure a full and open participation process. Update the metrics for PPP effectiveness, including a timeline in the PPP for future effectiveness evaluations.	The Transportation Addendum to the Public Engagement Plan was completed in 2022. It includes an evaluation of the effectiveness and a list of procedures and strategies to promote public participation.
Tribal coordination is not identified in the PPP.	Recommendation	Update the PPP to include the tribal governments and tribal consultation strategies.	Tribal coordination and outreach strategies were included in the September 2022 Transportation Addendum to the Public Engagement Plan.
The PPP does not identify an update cycle.	Recommendation	Identify an update cycle for the PPP.	Staff revised the 2022 Transportation Addendum to include the update cycle for federally required documents, including the UPWP, public participation plan, TIP, and Transportation Policy Plan.



1.2 Summary of Current Findings

The 2024 certification review determined that the metropolitan transportation planning process conducted in the Minneapolis – St. Paul, MN – WI urbanized area meets the federal planning requirements.

As a result of this review, FHWA and FTA certify the transportation planning process conducted by the Minnesota Department of Transportation (MnDOT), the Metropolitan Council Metropolitan Planning Organization (MPO) and the public transportation operators of the region – Metro Transit, Maple Grove Transit, Minnesota Valley Transit Authority, Plymouth Metrolink, SouthWest Transit, and University of Minnesota meet the federal planning requirements. While this report does not contain corrective actions, it does have several recommendations that warrant close attention and follow-up. The report also identifies areas in which the MPO is performing well and is to be commended. Table 2 summarizes the 2024 certification review topics areas, findings and actions.

Table 2: 2024 Certification Review Areas, Findings, and Actions

Review Area	Finding	Action	Corrective Actions/ Recommendations/ Commendations	Resolution Due Date
Consultation and Coordination 23 U.S.C. 134(g) & (i) 23 CFR 450.316, 23 CFR 450.324(g)	The Council’s Tribal consultation and coordination meets federal requirements.	Commendation	The Council is commended for the creation of a full-time Tribal relations and Native relations coordinator who increased the increased Tribal government and community outreach, coordination, and involvement. The Council also created an American Indian Advisory Council to advise the Council with the metropolitan transportation planning process.	N/A
Transportation Improvement Program 23 U.S.C. 134(c)(h)& (j) 23 CFR 450.326	The Council’s TIP public engagement meets federal requirements.	Commendation	The Council is commended for developing and updating an interactive TIP map to visualize where upcoming projects are occurring in the next four years.	N/A
Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324, Age Discrimination Act, Sec. 504 Rehabilitation Act, Americans with Disabilities Act	The Council’s work to collect and address discrimination complaints meets federal requirements.	Commendation	The Council is commended for developing a “Public Services Discrimination” complaint form and policy to protect against discrimination.	N/A



Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324, Age Discrimination Act, Sec. 504 Rehabilitation Act, Americans with Disabilities Act	The Council's work to collect and address Title II ADA complaints meet federal requirements.	Commendation	The Council is commended for the creation of a Title II ADA grievance that can be completed and submitted online.	N/A
Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324, Age Discrimination Act, Sec. 504 Rehabilitation Act, Americans with Disabilities Act	The Council is meeting federal requirements related to Limited English Proficiency.	Commendation	The Council is commended for implementing a call system that allows callers to select one of six non-English languages and an interpreter is connected for the call.	N/A
Metropolitan Transportation Plan 23 U.S.C. 134(c),(h)&(i) 23 CFR 450.324	The Council is meeting the federal requirements related to the Transportation Policy Plan's Financial Plan.	Commendation	The Council is commended for the detail and information on revenues and anticipated project costs in the Met Council's Transportation Policy Plan.	N/A
Metropolitan Planning Area Boundaries 23 U.S.C. 134(e) 23 CFR 450.312(a)	The update MPA Boundary materials do not document the required approvals.	Recommendation	The Federal Review Team recommends the Met Council seeks and documents the approval of the updated MPA Boundary that includes the updated 2020 adjusted urbanized area through the Policy Board and the Governor, or their designee. Once all approvals are secure, an electronic copy of the updated MPA Boundary is to be transmitted to FTA and FHWA for informational purposes.	Completed March 2025
Consultation and Coordination 23 U.S.C. 134(g) & (i) 23 CFR 450.316, 23 CFR 450.324(g)	The Memorandum of Understanding between the Council and the areas of Wright and Sherburne Counties within the Urbanized Area Boundary was signed in 2014 and does not reflect any areas included in the 2020 updated UAB.	Recommendation	The Federal Review Team recommends the Council and the communities within Wright and Sherborne counties in the 2020 Urbanized Area Boundary to update the Memorandum of Understanding to reflect any changes in agreements, coordination, and practices.	March 2026



Public Participation 23 U.S.C. 134(i)(6) 23 CFR 450.316 & 450.326(b)	The required federal transportation planning products and information was not easily found on the Council website by the Federal Review Team.	Recommendation	The Federal Review Team recommends ensuring the website provides access to all required federal transportation planning production and information such as the UPWP, MTP, TIP, Civil Rights plans, etc.	No later than May 2025
Public Participation 23 U.S.C. 134(i)(6) 23 CFR 450.316 & 450.326(b)	The Council's Public Engagement Plan was last updated in 2015. A Transportation Addendum to the Public Engagement Plan was completed in 2022.	Recommendation	The Federal Review Team recommends identifying a timeline to updating the Council's Public Engagement Plan to incorporate new principles, engagement techniques, and the 2022 Transportation Addendum.	March 2026
Public Participation 23 U.S.C. 134(i)(6) 23 CFR 450.316 & 450.326(b)	The review public engagement process and techniques for effectiveness was not clearly documented.	Recommendation	The Federal Review Team recommends documenting the effectiveness of public engagement conducted as outlined in the 2015 Public Engagement Plan to identify lessons learned and any potential changes to how engagement is conducted.	March 2026
Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324, Age Discrimination Act, Sec. 504 Rehabilitation Act, Americans with Disabilities Act	The Title VI complaint form is not able to be submitted online and can only be filled out online. It must be printed off and mailed unlike other Civil Rights forms.	Recommendation	The Federal Review Team recommends creating an online submittal form for Title VI complaints.	No later than May 2025
Metropolitan Transportation Plan 23 U.S.C. 134(c),(h)&(i) 23 CFR 450.324	The environmental mitigation information in the 2050 Transportation Policy Plan needs to be bolstered.	Recommendation	The Federal Review Team recommends an administrative modification to the 2050 TPP to add the required environmental mitigation narrative.	No later than May 2026
Metropolitan Transportation Plan 23 U.S.C. 134(c),(h)&(i) 23 CFR 450.324	The discussion of the federal performance measures, baseline data, performance trends, and performance targets in the 2050 Transportation Policy Plan is incomplete.	Recommendation	The Federal Review Team recommends an administrative modification to the 2050 TPP to update the federal performance measures section. The update should ensure that all federally required performance measures include required baseline data, target data, and historical trend progress toward achieving targets.	No later than May 2026



Transit Planning 49 U.S.C. 5303 23 U.S.C. 134 23 CFR 450.314	The transit working group participants feel their role in the planning process has not changed from their original creation in 2022.	Recommendation	The Federal Review Team recommends the Council meet with the regional transit providers and come to an agreement on the purpose of the Transit Planning Work Group and the roles of the RTPs. The Council should consider revisiting the member agencies that are part of the work group.	March 2026
Transportation Improvement Program 23 U.S.C. 134(c)(h)&(j) 23 CFR 450.326	The discussion of the federal performance measures, baseline data, performance trends, and performance targets in the Transportation Improvement Program is incomplete.	Recommendation	The Federal Review Team recommends the Council include all the required federal performance measures, targets, historical trend progress towards achieving targets, and a description of the anticipated effect of the TIP towards achieving the performance targets established in the 2050 TPP, linking investment priorities to those performance targets.	Updated with next TIP in 2025

Section 4.0 describes the certification findings for each of the recommendations listed in Table 2.



2.0 INTRODUCTION

2.1 Background

Pursuant to 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMAs) at least every four years. A TMA is an urbanized area, as defined by the U.S. Census Bureau, with a population of over 200,000. After the 2010 Census, the Secretary of Transportation designated 192 TMAs. In general, the reviews consist of three primary activities: a site visit, a review of planning products (in advance of and during the site visit), and preparation of a Certification Review Report that summarizes the review and offers findings. The reviews focus on compliance with federal regulations, challenges, successes, and experiences of the cooperative relationship between the MPO(s), the State DOT(s), and public transportation operator(s) in the conduct of the metropolitan transportation planning process. Joint FTA/FHWA Certification Review guidelines provide agency field reviewers with latitude and flexibility to tailor the review to reflect regional issues and needs. As a consequence, the scope and depth of the Certification Review reports will vary.

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

While the Certification Review report itself may not fully document those intermediate and ongoing checkpoints, the “findings” of Certification Review are, in fact, based upon the cumulative findings of the entire review effort.

The review process is individually tailored to focus on topics of significance 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.

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

2.2 Purpose and Objective

Since the enactment of the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, FHWA and FTA, are required to jointly review and evaluate the transportation planning process in all urbanized areas over 200,000 population to determine if the process meets the Federal planning requirements in 23 U.S.C. 134, 40 U.S.C. 5303, and 23 CFR 450. The Safe, Accountable, Flexible, Efficient Transportation



Equity Act: A Legacy for Users (SAFETEA-LU), extended the minimum allowable frequency of certification reviews to at least every four years.

The Metropolitan Council (Council) is the designated MPO for the Minneapolis – St. Paul urbanized area. The Minnesota Department of Transportation (MnDOT) is the responsible State agency. Metro Transit, a component of the Council, is the primary responsible regular route public transit operator in the region while the Metropolitan Council is the primary on-demand public transit operator in the region, including the region’s paratransit service. The region also has five other public transit providers: Maple Grove Transit, Minnesota Valley Transit Authority, Plymouth Metrolink, SouthWest Transit and the University of Minnesota.

The metropolitan planning area includes all areas in the counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott and Washington. The 2010 Census extended the urbanized area to include portions of Sherburne and Wright counties. The 2020 Census continued to include this urbanized area with some minor boundary changes. The City of Minneapolis is the largest population center for the region, as well as the state.

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

3.0 SCOPE AND METHODOLOGY

3.1 Review Process

The Council’s first certification review occurred in 1992. Since then, FHWA and FTA have conducted certification reviews every four years. The most recent review was completed in 2020. Appendix B summarizes the status of the 2020 findings.

Participants in the review included representatives of FHWA, FTA, MnDOT, Metro Transit, and Council staff. A full list of participants who attended the on-site review and separate meetings with Metro Transit and the other regional transit providers is included in Appendix A.

FHWA and FTA completed a desk audit of current documents and correspondence 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 for the following subject areas selected by FHWA and FTA staff for on-site review:

- Metropolitan Planning Area Boundaries
- MPO Structure and Agreements



- Unified Planning Work Program
- Consultation and Coordination
- Public Participation and Engagement
- Civil Rights (Title VI, EJ, LEP, ADA)
- Metropolitan Transportation Plan (MTP)
- Transit Planning
- Transportation Improvement Program (TIP)
- Transportation Safety
- Housing
- Congestion Management Process
- Planning Environmental Linkage/Corridor Planning

3.2 Documents Reviewed

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

- 2040 Transportation Policy Plan, 2020 Update
- 2050 Transportation Policy Plan (Draft)
- 2050 Transportation Policy Plan Public Engagement Summary
- ADA Transition Plan, 2020
- Adjusted Urban Area Boundary Map, 2024
- Congestion Management Process Policy and Procedures Handbook, 2020
- Congestion Management Process Plan 2019 Corridor Study Area Report, 2019
- Congestion Management Process Plan Transportation Trends Report, 2020
- Memorandum of Understanding between the Metropolitan Council, Region 7W Transportation Policy Board, Wright and Sherburne Counties, the Cities of Albertville, Elk River, Hanover, Otsego, and St. Michael, 2014
- Metropolitan Council – MnDOT 3-C MOU, 2018
- Metropolitan Council – MnDOT Performance Based Planning and Programming MOU, 2018
- Metropolitan Council and Regional Transit Providers MOU, 2022
- Metropolitan Planning Area Map, 2024
- Metropolitan Council Website
- Metro Transit 2024-2029 Capital Improvement Plan
- Public Engagement Plan, 2015
- Regional Solicitation Evaluation, 2014
- Regional Solicitation Evaluation Peer Review Summary, 2024
- Regional Solicitation Evaluation Before and After Study, 2024
- Regional Solicitation Website
- Transit Planning Working Group Purpose Statement, 2022
- Transportation Addendum to the Public Engagement Plan, 2022
- Transportation Advisory Board Overview
- Transportation Advisory Board Policies Document
- Transportation Advisory Board Bylaws
- Transportation Advisory Committee Bylaws



- Transportation Improvement Program: FY 2024-2027; FY 2025-2028
- Transportation Improvement Program Website
- Transportation Planning and Programming Guide, 2020
- Transportation Planning Process Overview
- Title VI Limited English Proficiency Language Assistance Plan for the Metropolitan Council, Metro Transit, Metro Mobility, and Transit Link, 2020
- Title VI Program, 2024
- Unified Planning Work Program, 2021 through 2025



4.0 PROGRAM REVIEW

4.1 Metropolitan Planning Area Boundaries

4.1.1 Regulatory Basis

23 U.S.C. 134(e) and 23 CFR 450.312(a) state the boundaries of a Metropolitan Planning Area (MPA) shall be determined by agreement between the MPO and the Governor. At a minimum, the MPA boundaries shall encompass the entire existing urbanized area (as defined by the Bureau of the Census) plus the contiguous area expected to become urbanized within a 20-year forecast period for the MTP.

4.1.2 Current Status

The Metropolitan Council was created in 1967 by the Minnesota Legislature and included Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington counties. Until 2009, these seven metro counties have defined the Council's Metropolitan Planning Area Boundary and included all the urbanized area as defined by the Census.

With the 2010 Census, for the first time, the urbanized area for the Minneapolis – St. Paul Metropolitan Area extended outside of the seven-county metro area and into areas of Wright and Sherburne counties. The Council officially expanded their MPA into these new areas. With the recent 2020 Census, the urbanized area expanded slightly further into Wright and Sherburne counties. During this review, the Council provided an updated MPA map dated July 2024. The map appeared to reflect the changes to the 2020 Census urbanized area. However, the Council provided no documentation of the approval of the updated MPA by the Council\ itself nor the Governor, or their designee.

The 2010 Census also extended the urbanized area into Wisconsin near Stillwater, MN, and the Council updated its MPA accordingly. With the 2020 Census, the urbanized area no longer includes any portion of Wisconsin. As such, the Council removed the Wisconsin area from the MPA dated July 2024.

4.1.3 Findings

The Federal Review Team finds the Council updated the MPA to include the changes to the urbanized area with the 2020 Census but does not find that the approval process was completed. FHWA and FTA identified one recommendation:

Recommendations: The Council must approve the updated MPA Boundary that includes the updated 2020 adjusted urbanized area. The Council must also request approval of the updated boundary from the Governor, or their designee. Once all approvals are secure, the Council must transmit an electronic copy of the updated MPA Boundary to FTA and FHWA for informational purposes.

Schedule for Process Improvement: No later than FHWA/FTA's next coordination meeting in May 2025



4.2 MPO Structure and Agreements

4.2.1 Regulatory Basis

23 USC 134(d) and 23 CFR 450.314(a) require the MPO, the State, and the public transportation operator to cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process. These responsibilities must be clearly identified in written agreements between the MPO, the State, and the public transportation operator serving the metropolitan planning area.

4.2.2 Current Status

MPO Structure

The Council is the designated MPO for the Minneapolis-St. Paul urban area. It consists of a 17-member board. The 17 members consist of one member at large (the chairperson) and 16 members who represent specific geographic areas. The governor appoints the 17 members. The current membership does not include elected officials, transportation agency officials or appropriate state officials.

During the 2023 legislative session, the Minnesota legislature created the Metropolitan Governance Task Force. [Minnesota Laws 2023, Chapter 68, Article 4, Section 123, Subdivision 4](#) directed the Task Force to study and evaluate options to reform and reconstitute the governance of the Council. The Task Force issued its [report](#) to the Legislature on February 1, 2024. The Task Force found that “there is widespread confusion and widespread disagreement about who is and who should be accountable for Met Council vision, planning, execution (construction and operation), and performance evaluation.” The Task Force presented several potential governance changes for the Legislature to consider.

Over the years, FHWA and FTA have received several inquiries regarding the Council’s composition and whether the Council qualifies for the exemption provided under 23 USC 134(d)(4). In response to the inquiries, FHWA and FTA have consistently noted that the Council was designated as the MPO before December 18, 1991, and has not been redesignated since. This allows the Council to qualify for the exemption under 23 USC 134(d)(4) regarding MPO composition requirements. The 2024 TMA certification review upholds this determination. However, a change to the governance structure of the Council may require the MPO be redesignated. Should the Legislature change the Council’s governance structure, FHWA and FTA will work with the Council and MnDOT to determine if a redesignation is needed.

MPO Agreements

The Council has several written agreements related to its planning process:

- 3-C planning process: The Council has three Memorandums of Understanding (MOU) for carrying out a continuing, cooperative and comprehensive (3-C) planning process:
 - In 2014, the Council and the affected areas of Sherburne and Wright Counties executed a MOU that documents each party’s roles and responsibilities in carrying out the required federal metropolitan transportation planning activities.



- 2018: The Council and MnDOT executed a MOU that documents each agency's roles and responsibilities in carrying out the transportation planning process identified in 23 USC 134 and 135, excluding performance measures.
- 2022: The Council and the regional transit providers executed a new MOU to document the Regional Transit Providers' roles and responsibilities in the regional transportation planning process. The Regional Transit Providers are involved at different stages for each plan, project, and process in the regional transportation planning process.
- **Performance measures:** In 2018, the Council and MnDOT executed a MOU documenting each agency's roles and responsibilities related to performance measures as required in 23 CFR 450.314(h). As part of the MOU, MnDOT, the Minnesota MPOs and the urban public transit providers developed a procedures document that details the specific requirements of each party. The procedures document was initially developed in 2017, with updates occurring in 2018 and 2019. The MOU is written to allow updates to procedures document without requiring updates to the MOU.

4.2.3 Findings

The Council satisfies the federal requirements related to MPO structure and agreements. FHWA and FTA identified one recommendation:

Recommendations: The MOU between the Council and the communities within the 2020 urbanized area of Wright and Sherburne counties should be updated to include any new urbanized areas and reflect any changes in agreements, coordination, and practices.

Schedule for Process Improvement: Within one year of certification (March 2026)

4.3 Unified Planning Work Program

4.3.1 Regulatory Basis

23 CFR 450.308 sets the requirement that planning activities performed under Titles 23 and 49 U.S.C. be documented in a Unified Planning Work Program (UPWP). The MPO, in cooperation with the State and public transportation operator, shall develop a UPWP that includes a discussion of the planning priorities facing the MPA and the work proposed for the next one- or two-year period by major activity and task in sufficient detail to indicate the agency that will perform the work, the schedule for completing the work, the resulting products, the proposed funding, and sources of funds.

4.3.2 Current Status

The Council adopts an annual UPWP. The draft UPWP is shared with the Council's Technical Advisory Committee (TAC) and Transportation Advisory Board (TAB) members. The draft UPWP is included in committee meeting agendas. The meeting agendas are available to the public and interested



stakeholders on the Council's website. The committee meetings are open to the public. For the 2025 UPWP, the Council posted the draft to the website.

During the 2020 review, the Federal Review Team identified four recommendations.

- Clarify and document the UPWP development process.
- Clarify and provide consistency in terminology used within the UPWP.
- Provide improved estimates of consultant project costs.
- Provide a clear link between the UPWP project name and MTP work program study when applicable.

With the 2022 UPWP, the Council added Appendix C which outlines the UPWP development process and how planning studies are selected. Most planned consultant studies are first identified in the adopted TPP Work Program and represent issues and needed work identified during the TPP update process. The TPP Work Program studies are discussed thoroughly throughout the TPP update process with the TAB and TAC committees and are reviewed as part of the TPP public comment process. The goal is to complete the identified studies over the next four years prior to the next TPP update and incorporate the findings and recommendations into the next update. After adoption of the TPP, issues may arise that point to the need for planning studies not identified in the TPP Work Program. When this occurs, the regional planning partners play a similar role to assist the Council in developing the study scope of work.

The Council strives to use consistent terminology within the UPWP and TPP Work Program chapter and draw a clear link between the listing of a study listed in each document. Any study names that change are noted within the UPWP.

Also beginning with the 2022 UPWP, the work tasks identify where consultants will lead studies and the estimated consultant costs associated with the study. Additional details and summaries on consultant studies are included in Appendix C.

4.3.3 Findings

The Council satisfies the federal requirements related to the UPWP.

4.4 Consultation and Coordination

4.4.1 Regulatory Basis

23 U.S.C. 134(g) & (i)(5)-(6) and 23 CFR 450.316(b-e) set forth requirements for consultation in developing the MTP and TIP. Consultation is also addressed specifically in connection with the MTP in 23 CFR 450.324(g)(1-2) and in 23 CFR 450.324(f)(10) related to environmental mitigation.

In developing the MTP and TIP, the MPO shall, to the extent practicable, develop a documented process that outlines roles, responsibilities, and key decision points for consulting with other governments and agencies as described below:



- Agencies and officials responsible for other planning activities (State, local, economic development, environmental protection, airport operations, or freight)
- Other providers of transportation services
- Indian Tribal Government(s)
- Federal land management agencies

4.4.2 Current Status

Tribal Governments

In 2019, the Council updated its Government-to-Government Tribal Relationship Policy. The policy outlined the engagement through consultation, collaboration, and cooperation with the 11 federally recognized Tribal Nations in Minnesota. The Council recognizes that meaningful and timely government-to-government consultation between the Council and the Tribal Nations facilitates better understanding and informed decision making on matters of mutual interest. The Council's MPA includes property owned by two of the 11 federally recognized Tribal Nations in Minnesota – the Shakopee Mdewakanton Sioux Community and the Prairie Island Indian Community. The Council expands coordination to include all tribal communities living within the Twin Cities metropolitan area. As well as those living outside the region who have a relationship with tribal land, or sacred or cultural sites.

The Council also had a full-time tribal relations and Native relations coordinator who increased community outreach, coordination, and involvement with Tribal governments and Native communities. While the Council does not have a Tribal representative on its Policy Board or Transportation Advisory Board, the Council hosts an American Indian Advisory Council to advise the Council with the metropolitan transportation planning process. The Council also holds regular meeting with the Minnesota American Indian Council during development of its planning products.

Coordination with Wright and Sherburne Counties

With the 2010 Census, the urbanized area for the Minneapolis – St. Paul Metropolitan Area extended outside of the seven-county metro area and into areas of Wright and Sherburne counties. In 2014, the Council signed a Memorandum of Understanding with the affected communities in Sherburne and Wright counties. The MOU outlined how the Council would coordinate with these communities during the transportation planning process, as well as identifying an annual meeting between Council officials and the affected communities.

With the recent 2020 Census, the urbanized area expanded slightly further into Wright and Sherburne counties. This provides an opportunity to revisiting, reaffirm, and adjust any agreements in the MOU.

Air Quality Coordination

Until 2022, a small portion of the Council's planning area was classified as a maintenance area for coarse particulate matter (PM₁₀). This required a written agreement between the Council and the Minnesota Pollution Control Agency that described the roles and responsibilities of each agency for air quality transportation related planning. Since the PM₁₀ maintenance period area and the Council is now in attainment with PM₁₀, air quality conformity is no longer required. However, the MPCA is still involved in



the transportation planning process and advises the Council as a part of the Transportation Advisory Committee.

4.4.3 Findings

The Council satisfies the consultation and coordination requirements. FHWA and FTA identified one commendation and one recommendation.

Commendation: The Council is commended for the creation of a full-time tribal relations and Native relations coordinator who increased the increased Tribal government and community outreach, coordination, and involvement. The Council also created an American Indian Advisory Council to advise the Council with the metropolitan transportation planning process.

Recommendations: The Federal Review Team recommends the Council and the communities within the 2020 Urbanized Area Boundary update the Memorandum of Understanding to reflect any changes in agreements, coordination, and practices.

Schedule for Process Improvement: Within one year of certification (March 2026)

4.5 Public Participation and Engagement

4.5.1 Regulatory Basis

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

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

4.5.2 Current Status

Public Engagement Plan

In response to the 2020 TMA Certification Review, the Council created the Transportation Addendum to the Public Engagement Plan in 2022. The Addendum outlines strategies for engaging with historically underrepresented groups, Tribal governments, and tribal communities. The Transportation Addendum also outlines methods of evaluation of the effectiveness of public engagement. These methods include qualitative and quantitative measures such as:



- Final reports that include data on the process of public participation
- Staff evaluation of data to compile a “lessons learned” narrative of the overall engagement method
- Method engaged underrepresented communities throughout the region
- Online engagement tools and other products are accessible to everyone
- Integrate outreach and engagement goals into public participation plans that are measurable and transferrable to other transportation policies
- Number of people participating in public involvement activities
- Number and diversity of organizations participating in transportation planning efforts
- Number of individuals who participate in transportation-related online discussions; depth of participation in discussions (based on measurable activities)
- Percentage of county, city, and township governments whose staff and/or policymakers participated in transportation planning efforts

While the Addendum discussed evaluating the effectiveness of public engagement, the Federal Review Team found little documentation of such evaluations outside of initial engagement summaries from the draft 2050 TPP. The Council’s engagement/communications coordinator indicated an analysis of engagement’s effectiveness is forthcoming.

Metropolitan Council Website

The Council’s website houses information and documents on all the planning work they are responsible for in the Twin Cities metropolitan area including transportation, land use/community planning, housing, parks, and water/wastewater. The Federal Review Team found it difficult to find documents on the website. For example, transportation studies and reports are located in two separate locations. The Title VI reports were not easily located. The 2023 ADA plan link displayed the 2022 report. The Council recognized the need to update the website and indicated they are currently in the process of an update in the near future.

4.5.3 Findings

The Council satisfies the federal public participation requirements. FHWA and FTA identified three recommendations.

Recommendations:

- The Federal Review Team recommends ensuring the website provides access to all required Federal transportation planning production and information such as the UPWP, MTP, TIP, Civil Rights plans, etc.
- The Federal Review Team recommends identifying a timeline to updating the Met Council’s Public Engagement Plan to incorporate new principles, engagement techniques, and the 2022 Transportation Addendum.
- The Federal Review Team recommends documenting the effectiveness of public engagement conducted as outlined in the 2015 Public Engagement Plan and the 2022 Transportation



Addendum to identify lessons learned and any potential changes to how engagement is conducted.

Schedule for Process Improvement: Within a year of certification (March 2026)

4.6 Civil Rights (Title VI, LEP, ADA)

4.6.1 Regulatory Basis

Title VI of the Civil Rights Act of 1964, prohibits discrimination based upon race, color, and national origin. Specifically, 42 U.S.C. 2000d 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.” In addition to Title VI, there are other Nondiscrimination statutes that afford legal protection. These statutes include the following: Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 U.S.C. 324), Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act (ADA) of 1990. ADA specifies that programs and activities funded with federal dollars are prohibited from discrimination based on disability.

4.6.2 Current Status

The Title VI program meets the requirements listed in FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients. The program identifies the Council’s services and describes how the Council meets the Title VI general requirements, fixed route transit provider requirements, and MPO requirements. The Council approved its 2023-2025 Title VI Program in October 2022.

The 2023-2025 Title VI LEP Language Assistance Plan was also approved by the Council in October 2022 and is consistent with the US DOT LEP Guidance. The plan identifies the number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee; frequency with which LEP individuals encounter the program; nature and importance of the program, activity, or service provided by the recipient to people’s lives; and resources available to the recipient and costs.

The Americans with Disabilities Act (ADA) Transition Plan and Accountability report was updated by the Council in April 2023. The Council completed a self- evaluation of its programs, services, and facilities in 2019 to identify barriers or obstacles and the necessary modifications, the findings and recommendations are detailed in the plan and updated as changes are made.

4.6.3 Findings

The Council satisfies the federal civil rights requirements. FHWA and FTA identified three commendations and one recommendation.

Commendations:



- The Federal Review Team commends the Council’s development of a “Public Service Discrimination” policy and the creation of an online complaint form to protect against age and socioeconomic discrimination.
- The Federal Review Team commends the Council for developing a Title II ADA grievance form that can be completed and submitted online.
- The Federal Review Team commends the Council for implementing direct response for six LEP populations by allowing callers to select a language at the beginning of the call and be directly connected with an interpreter.

Recommendation: The Federal Review Team recommends the Council develops a Title VI complaint form that can be completed and submitted online.

Schedule for Process Improvement: No later than FHWA/FTA’s next coordination meeting in May 2025

4.7 Metropolitan Transportation Plan

4.7.1 Regulatory Basis

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

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

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

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

- The current and projected transportation demand of persons and goods
- Existing and proposed transportation facilities
- A description of the performance measures and performance targets used in assessing performance of the transportation system
- A system performance report and subsequent updates evaluating the condition and performance of the transportation system
- Progress achieved by the MPO in meeting performance targets in comparison with system performance recorded in previous reports, including baseline data
- Operational and management strategies
- Congestion management process



- Assessment of capital investment and strategies to preserve transportation infrastructure and provide for multimodal capacity
- Design concept and design scope descriptions of proposed transportation facilities
- A programmatic discussion of potential environmental mitigation activities and potential areas to carry out these activities
- Pedestrian walkway and bicycle transportation facilities
- Transportation and transit enhancements
- A financial plan

4.7.2 Current Status

Background

State law requires the Council to adopt a foundational policy plan every 10 years. The Council creates a 30-year regional vision and policy plans for housing, regional parks, water resources, and transportation. State requirements guide the development of the development of the vision and policy plans. The Council's metropolitan transportation plan, which they call the Transportation Policy Plan (TPP), also serves as the Council's federally required MTP.

In 2018, the Council began an interim update of the MTP to better align the MTP update cycle with the Council's Regional Vision 10-year update cycle. The Council adopted the updated MTP in November 2020. At the time of the Council's November 2024 TMA Certification Review on-site meeting, the Council was in the final stages of collecting public comments and completing of a full update of a 2050 federally compliant MTP. The MTP is scheduled for formal adoption in March 2025.

Structurally, the 2050 Transportation Policy Plan (2050 MTP) has goals, objectives and strategies that align with the planning factors identified in 23 CFR 450.306. Detailed sections of the MTP include policies and actions; regional transportation finance; highway investment plan; transit investment plan; bicycle investment plan; pedestrian investment plan; TDM investment plan; freight investment plan; aviation system plan; evaluation and performance; work program; long-range highway and transit capital projects lists.

Financial Forecast

The updated 2050 MTP includes a comprehensive assessment of reasonably expected revenues and expenditures over the planning horizon of the plan, including available federal-aid, state, regional and local funding sources. Tables and graphs clearly illustrate existing and forecasted revenues as well as existing and forecasted capital and operating expenditures for both highways and transit. Significant supporting narrative also accompanies this revenue and expenditure data providing historical context, policy decisions and other supporting rationale for the forecasts.

The Federal Review Team made one minor comment to the Council during the on-site meeting. In reading the plan, it is unclear if the forecasted cost and revenue estimates incorporate inflation rates to reflect Year of Expenditure (YOE) dollars. The Council clarified these were in YOE dollars.

Public Engagement



The updated 2050 MTP also includes a comprehensive public engagement outreach effort utilizing working committees, community listening sessions, small group discussions, community events and intercept surveys, interviews with local governments, development workshops, online surveys and an interactive MTP website for the public to review and comment on the plan.

Performance Based Planning and Programming (PBPP)

PBPP is the application of Transportation Performance Management (TPM) within the planning and programming processes of transportation agencies to achieve desired performance outcomes for the multimodal transportation system. PBPP involves measuring progress toward meeting goals and using information on past and anticipated future performance trends to inform investment and policy decisions. PBPP focuses on the short-term and long-term investment decisions made through the statewide and MPO transportation planning processes.

Content in the 2050 MTP discussing federal performance measures, baseline data, performance trends and performance targets is missing some information. Baseline data is missing for some federal performance measures. Historical trend information is also missing which is necessary to document and communicate the trajectory of performance trends over time compared to identified targets. Additionally, discussion is missing regarding how the MPO planning process will integrate goals, objectives, performance measures and targets identified in other state and transit operator transportation plans.

Ongoing data collection, monitoring and updating of baseline data, targets and performance trends must be integrated in the MTP as part of a System Performance Report. Historical trends identified in the System Performance Report must be integrated into a MPO TIP investment strategy. Changes in the TIP investment strategy should be made over time to maximize outcomes for each identified performance target. The System Performance Report shall be developed collaboratively by the MPO, the State and transit operator and is a critical foundational component of a successful Performance Based Planning and Programming (PBPP) process.

Environmental Mitigation The 2050 MTP should include more discussion on environmental mitigation. Imagine 2050 provides a policy framework for environmental mitigation. The 2050 MTP also provides strategies and goals to achieve policies in Imagine 2050. Some of these strategies and goals tie to preservation of the natural and human environment and associated mitigation. However, the 2050 MTP does not discuss types of potential environmental mitigation activities or potential areas to carry out mitigation activities as required by federal law.

4.7.3 Findings

The Council satisfies the federal requirements related to the MTP. FHWA and FTA identified one commendation and two recommendations:

Commendation: The Council is commended for the detail and information on revenues and anticipated project costs in the Met Council's Transportation Policy Plan.

Recommendations:



- The Federal Review Team recommends an administrative modification to the 2050 TPP to update the federal performance measures section. The update should ensure that all federally required performance measures include required baseline data, target data, and historical trend progress toward achieving targets.
- The Federal Review Team recommends an administrative modification to the 2050 TPP to add the required environmental mitigation narrative.

Schedule for Process Improvement: No later than FHWA/FTA's next coordination meeting in May 2025

FHWA/FTA Technical Assistance: The Federal Review Team provided with best practice examples of how other MPOs have successfully incorporated performance measure and environmental mitigation requirements into their MTP.

4.8 Transit Planning

4.8.1 Regulatory Basis

49 USC 5303 and 23 USC 134 require MPOs to consider all modes of travel when developing their plans and programs. 23 CFR 450.314 states that the MPO, in cooperation with the State and operators of publicly owned transit services, is responsible for carrying out the transportation planning process.

4.8.2 Current Status

The region is served by seven public transit providers: Metropolitan Council contracted services, Metro Transit (operated by the Metropolitan Council), Maple Grove Transit, Minnesota Valley Transit Authority, Plymouth Metrolink, SouthWest Transit, and the University of Minnesota. All public transit providers in the region have a long history of providing transit service – over 30 years in most cases. The Metropolitan Council is the designated recipient of the region's FTA funds. This group is known as the Regional Transit Providers, or RTPs.

Transit providers are represented on the Transportation Advisory Board (TAB) where state, regional and local officials, transportation providers, and community members contribute to transportation planning and recommend projects for federal funding; and the Technical Advisory Committee (TAC) which provider technical advice to the Transportation Advisory Board (TAB).

The Council coordinated with the transit providers in the development of the Transportation Policy Plan (TPP) through listening sessions and early scoping sessions. The Council owns the transit vehicles of the RTPs. The Council is currently in the process of getting the regional bus spare ratio to 20% through implementing the Transit Capital Improvement Plan.

Meeting with Regional Transit Providers

In 2020, the Federal Review Team met with the Regional Transit Providers (RTPs): Maple Grove Transit, Minnesota Valley Transit Authority, Plymouth Metrolink, SouthWest Transit, and the University of Minnesota. The meeting discussed their role in the planning process. Two of the recommendations from the last certification review were:



- Execute a written agreement with all public transit providers that formalizes their role in the planning process.
- Work with all public transit providers to establish a regular meeting schedule to discuss activities related to transit in the planning process within the region.

In 2022, the Council implemented both recommendations. An MOU documenting the RTPs role in the regional transportation planning process was executed and the Transit Planning Working Group (TPWG) was formed. The purpose is to provide specialized-expertise and advice on technical issues related to transit to Technical Advisory Committee to the Transportation Advisory Board and to provide a stronger voice for transit providers in the metropolitan transportation planning process. The Chairperson and Vice-Chairperson of the Working Group will be selected by the Group through volunteers, and a vote will select members if multiple parties are interested. The Working Group will have a regularly scheduled meeting once every two months for two hours.

The TPWG is to be made up of technical staff from agencies and government bodies that are responsible for or involved in transit planning in the region. The members of the Working Group are intended to be representative and reflective of the various contexts in which transit is planned in the region. County and city members are intended to reflect the spectrum of Thrive community designations in which transit operates in the region. All transit providers will have members on the Working Group, per federal direction. The membership of the Working Group is as follows:

- Metro Transit – Service Development
- Metro Transit – Facilities Planning
- Metro Transit – Transitway Planning
- Minnesota Valley Transit Authority
- SouthWest Transit
- Plymouth Metrolink
- Maple Grove Transit
- The University of Minnesota
- Metropolitan Council, Metropolitan Transportation Services – Planning Department
- Metropolitan Council, Metropolitan Transportation Services – Contracted Operations Department
- City of Minneapolis
- City of Saint Paul
- Up to three Suburban Cities selected in consultation with Metro Cities
- Up to four counties including at least Hennepin and Ramsey
- Minnesota Department of Transportation

The purpose is to provide specialized-expertise and advice on technical issues related to transit to Technical Advisory Committee to the Transportation Advisory Board and to provide a stronger voice for transit providers in the metropolitan transportation planning process.

In November 2024, the Federal Team met with the RTPs as part of this certification review. In general, the RTPs feel their role in the planning process has not changed from four years ago. There is still not a clear understanding on how funds are allocated. One of the RTPs mentioned a positive experience



procuring buses with the Metropolitan Council. Another RTP stated their relationship has improved since the last certification review.

The RTPs remain concerned that they are not allowed to provide input into the planning process. They cite the TPWG as an example. As the TPWG includes members from cities and counties in addition to the RTPs, it does not allow for meaningful discussion due to non-transit members being a part of the group. While the Council provides updates and information to the RTPs, the RTPs are not given the opportunity to provide meaningful input throughout the policy development for process. Collaboration should be part of the process. The RTPs mention the decision to use Go-To fare cards on microtransit service as an example where there was no discussion on the accounting system that would be used to manage the fares.

The RTPs cited the Microtransit Working Group as an example of a collaborative effort with Metro Transit. Metro Transit involved the RTPs in drafting the request for proposals for the Microtransit Study and sought their feedback throughout the study.

Meeting with Metro Transit

In December 2024, the Federal Review Team met with Metro Transit, the primary responsible regular route public transit operator in the region. Metro Transit has a very collaborative working relationship with the Council. Metro Transit has worked with the Council on transit design and performance standards, and coordination on land use and local planning. Metro Transit works closely with TAB to get input on the regions Bus Rapid Transit (BRT) system, and with Council on modeling. Metro Transit and the Council have a “problem solving attitude” when working on projects and actively seek opportunities for coordination.

Metro Transit mentioned the Microtransit Study as a positive collaborative effort with the RTPs, and welcome more opportunities to work cooperatively. A couple of areas where Metro Transit identified when additional collaboration is needed with RPTs is with synchronizing transit schedules to provide more seamless transfers between systems.

4.8.3 Findings

The Council satisfies the federal requirements related to transit planning. FHWA and FTA identified one recommendation:

Recommendations: The Council should meet with the RTPs and come to an agreement on the purpose of the Transit Planning Work Group and the roles of the RTP. The Council should consider revisiting the member agencies that are part of the Work Group.

4.9 Transportation Improvement Program

4.9.1 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 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.

4.9.2 Current Status

The Council updates the TIP annually to cover a four-year period. The current TIP covers years 2025-2028. The TIP includes projects for different modes of transportation including transit, highway, and non-motorized transportation. The Council held a public meeting on the draft TIP at the May 2024 TAB meetings. The Council also accepted public comments from May 17, 2024 through July 1, 2024. During the comment period, the Council hosted a virtual public meeting. The Council posted a public notice in the Star Tribune newspaper and on its website. In addition, Council staff notified a diverse set of stakeholders about the public comment period. The Federal Review Team noted additional detail is needed on who were the stakeholders included in those communications and if they included Tribal governments and Federal Land agencies.

First released with the 2024-2027 TIP, the Council produces an interactive TIP map that is updated with the release of the draft TIP each year. It allows participants to clearly see what TIP projects are coming to their area and visually identifies the type of project including highway, transit, safety, bridge, bike/pedestrian, and ITS projects.

The Council uses a performance-based planning approach to develop the TIP. The Council adopted targets for the federal performance measures. The TIP discusses the anticipated effect of the TIP projects in helping the Council reach the established performance targets. The TIP also discusses how the investment priorities identified in the MTP guide the selection of projects, and as a result, also assist the region in achieving the performance targets. However, during the review, the Federal Review Team noted that performance trend analysis and baseline data was missing from the latest draft TIP for some of the federal performance measures.

4.9.3 Findings

The Council satisfies the federal requirements related to the Transportation Improvement Program. FHWA and FTA identified one commendation and one recommendation:

Commendation: The Council is commended for developing and updating an interactive TIP map to visualize where upcoming projects are occurring in the next four years.

Recommendations: The Federal Review Team recommends the Council includes all the required federal performance measures, targets, historical trend progress towards achieving targets, and a description of



the anticipated effect of the TIP towards achieving the performance targets established in the 2050 TPP, linking investment priorities to those performance targets.

Schedule for Process Improvement: To be included with the development of the next TIP in 2025.

4.10 Transportation Safety

4.10.1 Regulatory Basis

23 U.S.C. 134(h)(1)(B) requires MPOs to consider safety as one of ten planning factors. As stated in 23 CFR 450.306(a)(2), the planning process needs to consider and implement projects, strategies, and services that will increase the safety of the transportation system for motorized and non-motorized users.

In addition, SAFETEA-LU established a core safety program called the Highway Safety Improvement Program (HSIP) (23 U.S.C. 148), which introduced a mandate for states to have Strategic Highway Safety Plans (SHSPs). 23 CFR 450.306 (d) requires the metropolitan transportation planning process should be consistent with the SHSP, and other transit safety and security planning.

The Infrastructure Investment and Jobs Act (IIJA) (23 U.S.C. 148) incorporated the Safe System Approach into funding programs. Consistent with IIJA, there is proposed rulemaking put forward for the Highway Safety Improvement Program (reference 23 CFR Part 924) regarding the scope of the HSIP to focus on the safety of all road users on the entire public road network, improve evaluation practices, streamline reporting efforts, and ensure States are collecting Model Inventory of Roadway Elements (MIRE) fundamental data elements (reference Federal Register, Vol. 89 No. 35, Wednesday February 21, 2024). IIJA and FHWA initiatives are aimed at strengthening and advancing safety priorities of the DOT National Roadway Safety Strategy (NRSS) and assist States with making safety gains designed to eliminate fatalities and serious injuries on the Nation's roads.

The Public Transportation Agency Safety Plans (PTASP) regulation ([49 CFR Part 673](#)) requires operators of public transportation systems that receive federal funds under the FTA [Urbanized Area Formula Grants \(Section 5307\)](#), and rail transit agencies subject to the FTA [State Safety Oversight \(SSO\)](#) program, to develop an Agency Safety Plan (ASP) that includes the processes and procedures to implement a Safety Management System (SMS). SMS is a comprehensive, collaborative, and systematic approach to managing safety.

4.10.2 Current Status

The Transportation Policy Plan (TPP) includes an overarching goal related to safety—the Safety and Security Goal, as well as objectives and strategies (actions) the Council will employ to ensure that the desired safety outcomes are met. In addition, the five federally required safety performance measures and targets are included in the TPP in the Performance Outcomes chapter.

The 2050 TPP plan focuses on Healthy and Safe Communities. The safe system approach is incorporated into priorities for the plan. The plan also recognizes the importance of assessing and developing safety goals around vulnerable users.



The region has implemented several proactive and reactive strategies to improve the safety for users of all modes. These include a commitment to reduce the number of crashes involving fatalities and serious injuries annually. The Council sets goals each year aimed at the long-term goal of achieving zero fatalities and serious injuries. The Council distributes the HSIP funding to local partners in proportion to the level of fatal and serious injury crashes. Focusing funds based on where these crashes are occurring in a systemic manner based on risk a key reason Minnesota has seen significant reductions and remains one of the lowest fatal crash rate states.

The Council and its partners completed several studies to address safety. Additionally, the Council actively participates in the development of the *Minnesota Strategic Highway Safety Plan*. Consistent with the IIJA focus on vulnerable users and Safe Streets for All discretionary grant program, the Council completed a regional Pedestrian Safety Action Plan in 2022 and is currently completing a Regional Safety Action Plan. These efforts along with involvement in the Minnesota Towards Zero Deaths program, are aimed at eliminating fatalities and serious injuries on the transportation network.

There are three transit safety plans (MTS, transit, and rail). Targets are built off of rolling three-year averages. Metro Transit works with the suburban transit providers to develop targets. The plans are updated annually.

The major safety issues facing transit are transit employee assaults. Metro Transit is addressing this by installing barriers on vehicles and providing de-escalation training to employees. Emergency drills are conducted regularly. Metro Transit is in the process of hiring an Emergency Coordinator.

4.10.3 Findings

The Council satisfies the federal requirements related to the transportation safety.

4.11 Housing

4.11.1 Regulatory Basis

The Infrastructure Investment and Jobs Act (IIJA) made several changes to 23 U.S.C. 134 to include housing considerations in the metropolitan transportation planning process, including—

- Updating the policy to include, as items in the national interest, encouraging and promoting the safe and efficient management, operation, and development of surface transportation systems that will better connecting housing and employment (23 U.S.C. 134(a)(1))
- Adding officials responsible for housing as officials with whom the Secretary shall encourage each MPO to consult (23 U.S.C. 134(g)(3)(A))
- Requiring the metropolitan transportation planning process for a metropolitan planning area to provide for consideration of projects and strategies that will promote consistency between transportation improvements and State and local housing patterns (in addition to planned growth and economic development patterns) (23 U.S.C. 134(h)(1)(E))



- Adding assumed distribution of population and housing to a list of recommended components to be included in optional scenarios developed for consideration as part of development of the metropolitan transportation plan (23 U.S.C. 134(i)(4)(B))
- Adding affordable housing organizations to a list of stakeholders MPOs are required to provide a reasonable opportunity to comment on the metropolitan transportation plan (23 U.S.C. 134(i)(6)(A))
- Within a metropolitan planning area that serves a transportation management area, permitting the transportation planning process to address the integration of housing, transportation, and economic development strategies through a process that provides for effective integration, including by developing a housing coordination plan. (23 U.S.C. 134(k))

4.6.2 Current Status

The Council is involved with land use and housing planning in the Twin Cities metropolitan area due to requirements set in Minnesota state law. The Council creates a Land Use Policy Plan and a Housing Policy Plan which were updated at the same time as the Transportation Policy Plan and outline the objectives, policies, and actions for implementation in the region. Community development and housing develop staff members connect with the Council and Metro Transit staff for discussions related to transportation issues and topics.

4.6.3 Findings

The Council satisfies the federal requirements related to housing.

4.12 Congestion Management Process

4.12.1 Regulatory Basis

23 U.S.C. 134(k)(3) and 23 CFR 450.322 set forth requirements for the congestion management process (CMP) in TMAs. The CMP is a systematic approach for managing congestion through a process that provides for a safe and effective integrated management and operation of the multimodal transportation system. TMAs designated as non-attainment for ozone must also provide an analysis of the need for additional capacity for a proposed improvement over travel demand reduction, and operational management strategies.

23 CFR 450.324(f)(5) requires the MTP include Management and Operations (M&O) of the transportation network as an integrated, multimodal approach to optimize the performance of the existing transportation infrastructure. Effective M&O strategies include measurable regional operations goals and objectives and specific performance measures to optimize system performance.

4.12.2 Current Status

The 2016 TMA certification review identified fundamental weaknesses in the Council's CMP. The final report required the Council to improve the CMP to fully comply with 23 CFR 450.322 and the 8-step federal process by:



- Analyzing non-freeway principal and minor arterials.
- Including SMART (specific, measurable, agreed-upon, realistic, and timebound) regional objectives.
- Incorporating greater public transparency of CMP implementation.
- Documenting steps taken to consider potential CMP strategies.
- Evaluating previously implemented strategies for effectiveness.
- Integrating the CMP into the project selection process.
- Evaluating project benefits and costs in relation to congestion mitigation.
- Defining operation problems and expected solutions and benefits.

By the time of the 2020 TMA Certification Review, the development of a stand-alone Congestion Management Process and Procedures documents were underway but were not completed. The Council completed the creation of the CMP. The Council incorporated the CMP into the recent 2050 Transportation Policy Plan.

4.12.3 Findings

The Council satisfies the federal requirements related to CMP.

4.13 Planning and Environmental Linkages

4.13.1 Regulatory Basis

23 U.S.C. 168 and Appendix A to 23 CFR Part 450 provide for linking the transportation planning and the National Environmental Policy Act (NEPA) processes. A Planning and Environmental Linkages (PEL) study can incorporate the initial phases of NEPA through the consideration of natural, physical, and social effects, coordination with environmental resource agencies, and public involvement. This will allow the analysis in the PEL study to be referenced in the subsequent NEPA document once the project is initiated, saving time and money with project implementation.

4.13.2 Current Status

The Council has had ongoing participation in a variety of regionally significant corridor planning studies and PEL studies within the MPO planning area in cooperation with MnDOT and other involved local governments.

4.13.3 Findings

The Council satisfies the federal requirements related to Planning Environmental Linkage.

5.0 CONCLUSION AND RECOMMENDATIONS



The Council's metropolitan transportation planning process meets the federal planning requirements. FHWA and FTA did not identify any corrective actions. FHWA and FTA identified several commendations and recommendations.

5.1 Commendations

The following are noteworthy practices that the Council is doing well in the transportation planning process:

- The Council is commended for the creation of a full-time tribal relations and Native relations coordinator who increased the increased Tribal government and community outreach, coordination, and involvement. The Council also created an American Indian Advisory Council to advise the Council with the metropolitan transportation planning process.
- The Council is commended for developing and updating an interactive TIP map to visualize where upcoming projects are occurring in the next four years.
- The Council is commended for developing a "Public Services Discrimination" complaint form and policy to protect against discrimination.
- The Council is commended for the creation of a Title II ADA grievance that can be completed and submitted online.
- The Council is commended for implementing a call system that allows callers to select one of six non-English languages and an interpreter is connected for the call.
- The Council is commended for the detail and information on revenues and anticipated project costs in its Transportation Policy Plan.

5.2 Recommendations

The following are recommendations that would improve the transportation planning process:

- Metropolitan Planning Area Boundary: The Federal Review Team recommends the Council must approve the updated MPA Boundary that includes the updated 2020 adjusted urbanized area. The Council must also request approval of the updated boundary from the Governor, or their designee. Once all approvals are secure, the Council must transmit an electronic copy of the updated MPA Boundary to FTA and FHWA for informational purposes.
- Consultation and Coordination: The Federal Review Team recommends the Council and the communities within the 2020 Urbanized Area Boundary update the Memorandum of Understanding to reflect any changes in agreements, coordination, and practices.



- Public Participation and Engagement: The Federal Review Team recommends ensuring the website provides access to all required Federal transportation planning production and information such as the UPWP, MTP, TIP, Civil Rights plans, etc.
- Public Participation and Engagement: The Federal Review Team recommends identifying a timeline to updating the Council's Public Engagement Plan to incorporate new principles, engagement techniques, and the 2022 Transportation Addendum.
- Public Participation and Engagement: The Federal Review Team recommends documenting the effectiveness of public engagement conducted as outlined in the 2015 Public Engagement Plan and the 2022 Transportation Addendum to identify lessons learned and any potential changes to how engagement is conducted.
- Civil Rights: The Federal Review Team recommends the Council develops a Title VI complaint form that can be completed and submitted online.
- Metropolitan Transportation Plan – Environmental Mitigation: The Federal Review Team recommends an administrative modification to the 2050 TPP to add the required environmental mitigation narrative.
- Metropolitan Transportation Plan – Performance Measures: The Federal Review Team recommends an administrative modification to the 2050 TPP to update the federal performance measures section. The update should ensure that all federally required performance measures include required baseline data, target data, and historical trend progress toward achieving targets.
- Transit Planning: The Federal Review Team recommends the Council should meet with the regional transit providers and come to an agreement on the purpose of the Transit Planning Work Group and the roles of the RTPs. The Council should consider revisiting the member agencies that are part of the work group.
- Transportation Improvement Program: The Federal Review Team recommends the Council includes all the required federal performance measures, targets, historical trend progress towards achieving targets, and a description of the anticipated effect of the TIP towards achieving the performance targets established in the 2050 TPP, linking investment priorities to those performance targets.

5.3 Training/Technical Assistance

FHWA and FTA will provide the Council training and technical assistance when opportunities arise or when requested.



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



APPENDIX A - PARTICIPANTS

The following individuals participated in the in the Minneapolis – St. Paul, MN – WI urbanized area virtual on-site review:

- **Federal Highway Administration (FHWA) – Minnesota Division Office**
 - Josh Pearson – Community Planner
 - Dena Ryan – Community Planner
 - Scott Mareck – Technical Services Team Leader
 - Andrea Robinson – Civil Rights Specialist
 - Kristi Sebastian – Traffic Safety Engineer
- **Federal Transit Administration (FTA) – Region 5**
 - Bill Wheeler – Lead Community Planner
 - Susan Weber – Lead Community Planner
- **Federal Highway Administration – Office of Tribal Transportation**
 - Bobbi Retzlaff – Discretionary Grant Project Manager
- **Metropolitan Council**
 - Charles Carlson – Director, MTS
 - Amy Vennewitz – Deputy Director for Planning and Finance, MTS
 - Steve Peterson – Manager of Highway Planning, MTS
 - Jonathan Ehrlich – Manager of Travel Modeling and Research, MTS
 - Cole Hiniker – Manager of Multimodal Planning, MTS
 - Elaine Koutsoukos – TAB Coordinator, MTS
 - Dave Burns – Senior Highway Planner, MTS
 - Heidi Schallberg – Senior Planner, MTS
 - Joe Barbeau – Senior Planner, MTS
 - Steve Elmer – Planning Analyst, MTS
 - Tony Fischer – Planning Analyst, MTS
 - Jed Hanson – Senior Planner, MTS
 - Joe Widing –
- **Metro Transit**
 - Andrew Brody, Safety Director
- **Minnesota Department of Transportation (MnDOT)**
 - Molly McCartney – Metro District Planning, Program Management, and Transit
 - Erika Shepard – Metropolitan Planning Program Coordinator

The following individuals participated in the virtual meetings held with the suburban public transit operators:

- **Federal Highway Administration (FHWA) – Minnesota Division Office**
 - Josh Pearson – Community Planner



- Dena Ryan – Community Planner
- Scott Mareck – Technical Services Team Leader
- **Federal Transit Administration (FTA) – Region 5**
 - Bill Wheeler – Lead Community Planner
 - Susan Weber – Lead Community Planner
- **SouthWest Transit**
 - Stephanie Alexander – Director of Operations
 - Erik Hansen – Chief Executive Officer
 - Sunita Kasichhwa – Transit Planner
- **Minnesota Valley Transit Authority**
 - Luther Wynder – Chief Executive Officer
 - Heidi Scholl – Director of Administration
 - Matt Fyten – Chief Development Officer
 - Elle Larkin – Finance Director
- **City of Maple Grove/Maple Grove Transit**
 - Mike Opatz – Transit Administrator
 - Chris LaBounty – Director of Public Works and Engineering
- **City of Plymouth/Plymouth MetroLink**
 - Nur Kasin – Transit Administrator
- **University of Minnesota**
 - Lonetta Hanson – Administrative Services Assistant Director & Chief of Staff
 - Larry Stromberg – Transit Manager

The following individuals participated in the virtual meeting held with Metro Transit:

- **Federal Highway Administration (FHWA) – Minnesota Division Office**
 - Josh Pearson – Community Planner
 - Dena Ryan – Community Planner
 - Scott Mareck – Technical Services Team Leader
- **Federal Transit Administration (FTA) – Region 5**
 - Bill Wheeler – Lead Community Planner
 - Susan Weber – Lead Community Planner
- **Metro Transit**
 - Adam Harrington – Director of Service Development
 - Katie Roth – Director of Arterial Bus Rapid Transit



APPENDIX B – 2020 FINDINGS STATUS

One priority 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 Appendix identifies recommendations from the previous certification and summarizes discussions of how they have been addressed. The 2020 review did not identify any corrective actions.

Recommendation 1: Unified Planning Work Program (UPWP)

Finding: The process for developing the UPWP is not documented.

MPO Action: Clarify and document the UPWP development process related to internal processes and how projects are selected.

Resolution Date: Next update of the UPWP

Status: Starting with the 2022 UPWP, UPWP now includes language describing how projects are selected in appendix C.

Recommendation 2: Unified Planning Work Program (UPWP)

Finding: The UPWP does not clarify terms/processes or when a project name changes.

MPO Action: Clarify and provide consistency in terminology used:

- Provide examples of the types of funds used as local overmatch funds and describe how those local overmatch funds are used.
- Provide consistency in UPWP study names.
- Clarify what consultant start dates mean.

Resolution Date: Next update of the UPWP

Status: Starting with the 2022 UPWP, the document includes the following:

- The source of non-federal funds and clarifies that federal funds and required match is spent prior to any overmatch.
- Any study names that have changed are noted within the UPWP.
- UPWP has been updated to include study start date, total project budget and budget for the given year

Recommendation 3: Unified Planning Work Program (UPWP)

Finding: The scope and cost of consultant projects listed in the UPWP are subject to change.

MPO Action: Provide improved estimates of consultant project costs and work with MnDOT to determine when an amendment is needed if changes occur to the scope/cost of consultant projects identified in the UPWP.

Resolution Date: Next update of the UPWP



Status: UPWP has been updated to include an estimated total and annual budget for new consultant studies, with some instances of a range to allow for potential additional tasks.

The Council requires all consultant studies to include an Individual Cost Estimate (ICE) prior to advertisement. The ICE assists project managers in determining a budget based upon tasks within the scope of work. The Council's Procurement office has instituted a number of changes that improves coordination with MnDOT on changes in project scope and cost.

Recommendation 4: Unified Planning Work Program (UPWP)

Finding: The UPWP project name is not consistent between the UPWP and the MTP work program.

MPO Action: Provide a clear link between the UPWP project name and MTP work program study when applicable. Clarify when a MTP work program study name changes from one MTP update to the next update.

Resolution Date: Next update of the UPWP and MTP

Status: The 2050 TPP work program names will be consistent with the UPWPs. Any change will be noted within the UPWP description.

Recommendation 5: Transit Planning

Finding: The Council does not have a written agreement identifying responsibilities in carrying out the metropolitan planning process with transit providers.

MPO Action: Execute a written agreement with all public transit providers that formalizes their role in the planning process.

Resolution Date: Within one year of the release of the 2020 TMA Certification Report.

Status: Written agreement finalized in 2022 and sent to FHWA via email.

Recommendation 6: Transit Planning

Finding: The Council must improve coordination with all transit providers.

MPO Action: Work with all public transit providers to establish a regular meeting schedule to discuss activities related to transit in the planning process within the region.

Resolution Date: Within six months of the release of the 2020 TMA Certification Report.

Status: The Council has established the Transit Planning Working Group, which meets bi-monthly. MOU and purpose sent to FHWA via email.

Recommendation 7: Transit Planning

Finding: The Council must improve coordination with all transit providers.

MPO Action: Update the Council's website so that information on all public transit providers is more prominently displayed.

Resolution Date: Within six months of the release of the 2020 TMA Certification Report.

Status: The website was updated in September 2021.



Recommendation 8: Transportation Improvement Program (TIP)

Finding: The TIP financial plan does not provide the process for determining the allocation of federal funds among the area transit providers.

MPO Action: Clarify how funds are distributed among the regional transit providers.

Resolution Date: May 2021 to include adopted principles in draft 2022-2025 TIP and December 2021 to include principles and process posted on the website.

Status: With the 2021-2024 TIP, the document included a brief description of the process. The website was updated to outline principles and process for allocating federal funds amongst area transit providers.

Recommendation 9: Public Participation

Finding: A periodic evaluation of the Public Participation Plan (PPP) is required. The PPP metrics need updating.

MPO Action: Evaluate the effectiveness of the procedures and strategies identified in the PPP to ensure a full and open participation process. Update the metrics for PPP effectiveness, including a timeline in the PPP for future effectiveness evaluations.

Resolution Date: March 2022

Status: The Transportation Addendum to the Public Engagement Plan was completed in 2022. It includes an evaluation of the effectiveness and a list of procedures and strategies to promote public participation.

Recommendation 10: Public Participation

Finding: Tribal coordination is not identified in the PPP.

MPO Action: Update the PPP to include the tribal governments and tribal consultation strategies.

Resolution Date: March 2022

Status: Tribal coordination and outreach strategies were included in the September 2022 Transportation Addendum to the Public Engagement Plan.

Recommendation 11: Public Participation

Finding: The PPP does not identify an update cycle.

MPO Action: Identify an update cycle for the PPP.

Resolution Date: March 2022

Status: The inclusion of an update cycle was not initially included in the 2022 update to the Transportation Addendum to the Public Engagement Plan. Staff has since updated the Transportation Addendum to include the update cycle for this and other federally required documents, including the UPWP, TIP, and Transportation Policy Plan.



APPENDIX C – PUBLIC COMMENTS

From November 14, 2024 through January 1, 2025, the Federal Review Team, with the assistance of Council staff, provided transportation partners and the public an opportunity to comment on the Council’s planning process. The public comment period included:

- A public meeting to provide comments.
- A survey about the Council’s planning process posted on the Met Council’s website and promoted through email to stakeholders.
- A presentation overview of the TMA Certification Review with information on other ways to provide public comment including by phone, mail, or email.

Section C.1 contains the public comments received during the public meeting. Section C.2 lists the survey results. FHWA and FTA also received one letter providing comments included in Section C.3 Section C.4 summarizes the common themes from the public comments received.

C.1. Public Meeting Comments

Comment #1

I have served on the Transportation Advisory Board for six years and been a transit advocate for 25-30 years. We have counties planning guideway transit and we have the Metropolitan Council planning local, BRT bus or ABRT bus. Those two create a vision that probably better be unified so that the region can be expressed as a region by the regional body, the Metropolitan Council, instead of the counties. Counties by definition are not regional. And it’s my belief that we’ve seen several opportunities lost and mistakes made because of our transit guideway planning has been in the hands of counties for over 30 years rather than in the hands of the Metropolitan Council. That’s not to say there wouldn’t have been opportunities missed or mistakes made for a different structure, more unified structure, but I still say that I don’t think we’d have the cost overrun. Or other problems that we have with Southwest light rail. I don’t think we would have approached the Riverview corridors as we have. I don’t think we would have the problems with the purple line that we have right now if the guideway planning were in the hands of the Metropolitan Council and with a regional perspective instead of in the counties with a county perspective. Thank you very much.

Comment #2

I’ll just give you an example to add to my previous comment. Due to the closure of the Ford Plan in St. Paul, the rail spur that fed that property is still there. I don’t know whether it’s an industrial spur or a mile posted railroad regulated by the Federal Railroad Administration. But when we, I and others, proposed to Ramsey County, we were rejected or ignored, even though that’s a continuous right-of-way from the western border of St. Paul all the way to downtown. I don’t believe it was seriously considered. So that’s just one example of where if the Met Council had been in charge and been doing the planning, we would have had a better shot at acquiring that rail spur for the public good and using it in the planning process of Riverview Corridor. Thank you.



C.2 Survey Results

The Federal Review Team created an online survey to collect comments and feedback from planning partners and the public on the Council’s transportation planning process. The Council hosted the survey link on their website from November 14, 2024, to January 1, 2025. The Federal Review Team received 67 completed surveys and 85 comments through the two open ended questions.

Question 1: How would you most closely identify yourself in relation to the Metropolitan Council? (N=84)

Categories	Responses
County or City staff	9
Elected official	4
I serve on the Transportation Advisory Board or the Met Council	3
Partner agency	3
Resident/Public/Stakeholder	54
State DOT staff	3
Other (please specify)	8

Others included employees, former TAB members, a consultant, and former chair of city planning commission.

Question 2: Have you ever commented or participated in the Metropolitan Council’s transportation planning process such as attending a public meeting, providing a comment, or serving on a committee? (N=76)

Categories	Responses
Yes	38
No	35
Other (please specify)	3

Others included an attempt to fill out an online Metro Transit, but the survey was too complicated and those who reviewed planning documents but did not provide comments.

Question 3: How have you received or otherwise come across information regarding transportation planning conducted by the Metropolitan Council? (select all that apply) (N=76)

Categories	Responses
Email	64
Direct mail/newsletter	14
Print media (newspaper articles or ads)	15
Public meetings or events	24
Personal network (i.e. family, friends, neighbors, etc.)	17
Website - www.metrocouncil.org	32
Social Media (i.e. Facebook, LinkedIn, etc.)	23



Other organizations or agencies (i.e. neighborhood/civic groups, businesses, etc.)	26
None of the above; I have not received or come across this type of information before.	2

Question 4: Thinking of the communication methods from question 3, what is your preferred source of information for transportation planning in Metropolitan Council? (N=76)

Categories	Responses
Email	63
Direct mail/newsletter	13
Print media (newspaper articles or ads)	6
Public meetings or events	15
Website - www.metrocouncil.org	17
Social Media (i.e. Facebook, LinkedIn, etc.)	9
Other organizations or agencies (i.e. neighborhood/civic groups, businesses, etc.)	8
None of the above	3

Question 5: Over the past year, how often have you seen or sought out information regarding transportation planning in the Metropolitan Council planning area? (N=76)

Categories	Responses
Very often (more than monthly)	21
Somewhat often (5-12 times per year)	29
Not often (fewer than 5 times per year)	18
No times in the last year	5
Never	3

Question 6: Overall, you feel that you are well informed on how to influence and shape policy, goals, and funding decisions within the Metropolitan Council planning area. (N=67)

Categories	Responses
Strongly agree	7
Somewhat agree	21
Neutral	14
Somewhat disagree	14
Strongly disagree	11

Question 7: Overall, you feel you have adequate opportunities to attend and participate in the transportation planning process. (N=67)

Categories	Responses
Strongly agree	7
Somewhat agree	22



Neutral	21
Somewhat disagree	11
Strongly disagree	6

Question 8: Have you read or are you aware of the following documents? (select all that apply) (N=67)

Categories	Responses
IMAGINE 2050 Vision (or the previous Thrive MSP 2040 Vision)	38
Transportation Policy Plan (TPP)	32
Transportation Improvement Program (TIP)	33
Unified Planning Work Program (UPWP)	8
Congestion Management Process (CMP)	6
Another Plan or Study	19
None of the above	17

Question 9: What barriers have you experienced when engaging with the transportation planning process? (select all that apply) (N=67)

Categories	Responses
Not understanding the impacts of transportation in my life and/or my agency/industry	5
Awareness of opportunities to participate	24
Not a priority for me and /or my agency	2
Lack of time/too large of a commitment	22
Subject matter/materials are too technical and/or complicated	10
Not aware of how my comments or feedback are used	27
Not understanding the value and/or experiencing the results of my feedback	21
I feel my participation/feedback won't make a difference	37
Lack of/unreliable internet access	1
Time of meetings/events	13
Location/accessibility of meetings/events	17
Not applicable: I have not engaged in the planning process	6
Other (please specify)	12
None of the above; I have not experienced any barriers	5

Question 10: What do you feel works well in the transportation planning process in the Metropolitan Council planning area?

- Weekly and/or monthly newsletters (by e-mail) on construction progress with technical details suitable for layman and including links to YouTube videos showing fly-over views of stations under construction.



- Know who and what are involved in the various activities.
- Lack of 21st Century vision of public transit for the remainder of the 21st Century and thereafter. It seems to be focused on maintaining the status quo.
- Met Council tries, it seems! It is a difficult task to plan for a large metropolitan area.
- Public opportunities are made available. Information is made available to the public through various channels.
- Transportation Policy Plan, 2050 vision
- I'm aware that the Met Council has open comment periods and surveys so the public may participate. However, those opportunities are not timely for the residents who are affected by the proposed changes. Any feedback that may affect changes in plans are politicians, special interests and the wealthier Minnesotans.
- Not much, it seems mass transit is being pushed down the residents' throats even.
- The City, MnDOT, and Hennepin County have robust public engagement forums, surveys, and documentation that provides information to residents on transportation projects (County roads, City streets, state highway projects, etc).
- What I only hear of is their one-vision planning about light rail, which is an unsafe, costly tragedy in the Twin Cities and could be better spent on other modes of transit. As long as the federal govt. keeps giving them A LOT OF MONEY, they will spend it on light rail. Yet, light rail ridership is down because it is unsafe, ridership can't even support the costs of operations, and if you look at the NorthStar rail line, is EXTREMELY subsidized. I do not feel they have a concern about costs, to the detriment of the public, and there is a very negative effect also, on the property tax burden in this area in part because of it. However, something they do fair is transportation for people who need assistance, Metro Mobility. That could use improvement, though.
- Essentially nothing. The system is rigged to spend the maximum amount of money to achieve counter-productive results.
- Coordination and consistency across various geographic areas.
- open house events
- The cooperation of local government units on the TAB
- I currently receive email updates from the Met Council. Their email updates regarding planning and in progress projects is very transparent.
- It's been rough since the pandemic started.
- Not much. Example Purple Line has cost Ramsey County taxpayer Millions when management of the proposed bus RTL was transferred to Met Council staff. The public has long objected to using the surface area of Vento Trail as the BRT route when at least three other existing roads could be used and this popular Public Trail could be preserved! Finally the Met Council agreed to consider an



alternate route, White Bear Avenue. Despite spending Millions on staff and planning charts, and broad public support being documented by their “process”, the Met Council has not acted to officially abandon Vento Trail and move forward with the White Bear Avenue route. How many more tax dollars and years of “Process” will be spent with nothing to show the public, but a pile of failed studies?

- Outreach is timely and includes local government technical advisory representation
- Multiple stakeholders participated in the process. The process is reviewed, and changes are made based on feedback.
- I like that they publish meetings on YouTube so I can watch them later when I have time.
- Nothing. Communication from Met Council reps is slim to none. Poor community engagement.
- meeting with folks who are going to be impacted by changes
- The meetings to a certain extent but they just don't change the way they do business. Eg. limited access to train stations - this is a free ride to a riot unless something changes on the design of the stations. Are highway engineers doing this work or transit engineers?
- Coordination I suppose
- There a few staff that work on the regional solicitation process that do an exceptional job developing funding scenarios and working to balance the conflicting needs and opinions.
- Studies that take a wholistic look at the worst areas in the metro (i.e. congestion) and come up with solutions and projects to solve them.
- I think the Metropolitan Council does a good job with the resources they have. They strive to do their best and solicit feedback
- They have a lot of data.
- Input of news media highlighting the problems (crime) on the streetcars and around the stations.
- Good reporting in local media, signage in public transit
- Get Rid of the Met Council participation. Its a joke!!
- Feedback is solicited from residents that is presumably incorporated into final planning decisions
- Websites & email sign-ups
- I can't think of anything.
- Using Union Labor, Realistic time lines, proper planning and allocated money
- Connection to long-range regional and local forecasting; Opportunities to connect and align with other regional system planning like the regional park system and (in theiry) the wastewater system. Transportation planners have access to a lot of good regional and local information within the broader Met Council organization.



- Structured process. Lots of staff working on it.
- I do not like the amount of money they spend or the projects so I am going to say "Not much" works well as the results are a disappointment.

Question 11: How do you feel the transportation planning process in the Metropolitan Council planning area could be improved?

- The leadership is politically influenced and oriented and inherently biased against bipartisan discussion. It is true that the mostly GOP opposition is ignorant of the economic value of mass transportation. Both parties are against SUBWAYS as opposed to LRT evidently because the Federal budget is oriented on war spending, aircraft carrier battle groups, overpriced and technically doomed fighter planes and wingman drones, etc., ICBMs, warheads and gravity bombs, etc. Again, we here in Minnesota need SUBWAYS and lots of them--it is COLD here six months of the year! Even the LRT is falling apart, crime-ridden, half the time late, poorly timed and coordinated, constantly cancelled runs by LRT and BRT (cancel alerts are always AFTER the runs are cancelled!). In other words, Metro Transit does not know how to run a bus system or a railroad and is incapable of imagining SUBWAYS.
- Find a way to identify and make public the personal attitudes members seem to be bringing to the various issues, rather than a rational consideration of the evidence devoid of personal agendas.
- The duty of the Council is to present a vision or set of visions of what the transportation system needs to be in order to deliver a meaningful service
- Work in direct connection with MnDOT OSPH and OES. Take down their GHG inventory tool, as it is a drastic undercount of GHG's and doesn't account for entire scopes of emissions. Expansion of land use is quite questionable.
- I am feeling better for the transportation planning process.
- Though, the public opportunities are available the locations of those opportunities are not representative of the region. They are concentrated in the metro or south metro. Additionally, feedback is oftentimes gathered from individual residents. Commercial and Industrial businesses should also be included in these conversations as their freight and workers are traveling on our road systems. Though the information provided is available through various channels, the general public has no idea what those channels. A greater effort should be made on getting feedback throughout the entire region so that a clear understanding of the needs of the system are addressed rather than a small, specific area.
- Direct election of Met Council members making the TAB waiver obsolete, end county rail authorities/move their responsibilities to the Met Council
- Everything, including finding a way to engage communities affected by the change early on in the process.



- More representation is needed from individuals who bring views and expertise on better urban design, i.e., urban design where many car-centric transit / transportation "needs" are supplanted by walkable, bikeable, mass-transit-navigable communities that aren't reliant on cars as the first or default transit choice. Many of the TPP workgroup advisory members are city and county representatives, and while some may be forward-thinking, I fear that many are locked in the mindset of continuing with development of our metro area in a car-centric manner, with walkability, bikeability, and transit-friendliness as an add-on rather than the core focus. Need more integration with experts on climate-friendly development and transit / transportation.
- Prior to signing billion dollar commitments genuinely taking into considerations of the cities and their residents thoughts would be a great start. Massive amounts of wasted monies on the green line extension alone....
- The Met Council's board representatives are not accessible (I've reached out via phone and email to my representative's office, but have not received a response to any inquiries). I have submitted comments to Met Council on TIP proposals and on Imagine 2050, but the Met Council does not seem to make changes based on my, or others, feedback. The process could be improved if Met Council was receptive to changing course, such as modifying TPP goals or offering engineering design alternatives to TIP projects that better meet the community need. Generally, Met Council needs to improve access to appointed officials. And Met Council needs to take suggestions seriously from the public when we ask you to fundamentally change your transportation planning process or policies, like when we ask you to deprioritize congestion relief projects like highway expansions, and instead prioritize social and health wellbeing. Metro-area citizens have no power to affect Met Council transportation planning; the only option is through state legislation. That needs to change.
- Make the Met Council elected with term limits. Evaluate the staffing. Look at the reality of what people can really afford. Stop giving them money for projects that can't support themselves. Let the public decide by electing the Met Council, by electing community stakeholders who can develop more appropriate change. Stop giving them money until they are elected. How can you really expect people to effect change with an appointed council with a outsized budget that we simply cannot elect people to serve on?
- FIRE EVERYONE, start fresh with people who care about IMPROVING transportation instead of libtards who care about political-correctness.
- More emphasis on transportation needs of various small population groups, e.g. stratification by age and location.
- Reduced focus on light rail and expanded focus on rapid bus transit
- Providing better communication of the results of approved projects would help to build public trust that the Met Council isn't just approving transportation projects, but is making progress towards measurable goals.
- The broadcasted information (planned email blasts, survey notifications, etc.) is always well organized and transparent. However anytime I have reached out with an individual



question/comment/or concern I have not heard back from Metro Transit. At this point I have given up on future engagement given my past experiences. It is also an open secret that the Met Council has upper staff that are guilty of misogyny and racism. I have heard from multiple staff and interns that you only have a shot of being heard if you are a white man.

- Move the planning process and construction to MNDOT! The budget busting boondoggle the Green Line extension has become, and Purple Line plan to build nothing over the Years, are all proof of a failed Met Council management.
- At time they provide easily digestible and well-advertised ways to provide feedback on broad policies topics, but navigating the website to find the full documents and understand more detail and context can sometimes be challenging.
- Continued involvement of stakeholders and response to feedback.
- Their boards need proportional voting. It drives me nuts as a Minneapolis resident watching these meetings and seeing the outsized role the outer ring of the metro gets in deciding funding. It isn't fair because people in the suburbs use transportation in my city but many people in my city never visit theirs. It's ridiculous that so much money gets spent subsidizing wealthy sprawling areas when my city has to scrounge under the couch cushions to fix the dangerous main roads they all commute in on.
- Better community engagement. More communication, including from our appointed reps on the Council who we never hear from and don't know who they are. They are out of touch. Seems the whole Met Council operation is an insider deal.
- Continuing to educate folks in ways they understand the changes that are being made
- The senior leaders don't listen. It seems that they are hiding behind Title VI. This also includes the Chief of Police.
- Stop allowing MNDOT to ignore and abuse of the policy that protects park lands from development by examining the other beneficial uses of the site prior to decision making. MNDOT has recently abused this process on MPRB lands and it is not acceptable. There seems to be no public process related to decisions that impact 4f lands. In fact MNDOT has ruled park land not to be park land in some cases, with absolutely no means for the public to provide input or park boards to fight this decision. Example - Soo Line Community Garden, which is on MPRB land and is used for urban community gardening (providing local, inexpensive access to food for residents in a low-income neighborhood) and natural areas for birds, animals, and people to enjoy the quiet of nature. All of these uses, and more, were entirely ignored in MNDOT's decision making process. Luckily the community was able to defeat this poorly planned project that threatened the many beneficial uses of the Park Board and garden property. During this project, there was not a place, there were no means, to ask questions or get answers with MNDOT staff. I emailed and called multiple time. Sure I got a response, but never any answers. It was a controversial project. Perhaps that is why they ignored my multiple attempts to get information about the 4f process and find out about public



input opportunities on the decision-making process. I am no stranger to politics in administrations. It appears they purposely had a public relations person contact me, and that person proceeded to ignore multiple requests - not just from me - for information. MNDOT ignored multiple public requests for information on the 4f process, from multiple people, and would not "allow" the staff who made the decisions on the project of concern (the subject matter experts) to communicate with anyone in the public about the justifications for their decision. The whole 4f process is a sham and needs to be looked at seriously ASAP!! The public is being ignored in regard to 4f protections for park land. Park land provides so many climate resiliency benefits, and these benefits are being outright ignored by MNDOT and county government (i.e. Hennepin County's Community Works program). Transportation departments across local, state, and federal agencies seem to ignore all other beneficial uses of park land to the detriment to the community. Why even have 4f if you are going to ignore it and not allow public input. On the surface, it seems like a good policy, but MNDOT is not following the policy, and they are not allowing or offering opportunities for public input. In fact, they are actively ignoring public questions and input. At least that's my personal experience. I tried very hard to reach someone to get answers. Shame on MNDOT, Hennepin County, and Met Council for not doing better to protect our public parks, community gardens (access to food), and pitting nature against bicycling infrastructure. We can have both things. We need both things. We are better than this. I hope you take my comments seriously. Thousands in the community fought for 2 years against a project on park land, and MNDOT never even bothered to engage with the us or offer an explanation about why the park land property was not deemed 4f when it was clearly 4f property. I forgot to mention that MNDOT didn't even engage the MPRB prior to making their decision that MPRB property wasn't 4f protected. Instead MNDOT made their decision based on information found on the MPRB website. So they didn't engage the local government agency with jurisdiction; they googled it. That's the level of time and research MNDOT put in to assessing a controversial project in the community. It's an embarrassment.

- Listen to citizens and take their feedback to heart. Everyday people are ignored and special interest groups are favored. Seems to be a dearth of practicality in planning, and in real life experience. Planners need to get out to the areas they are working on to experience realities. Talk to locals. Observe in all weather and time conditions. Also build for electric car future and stop the ridiculous prioritization of bikeways on all our roads. I'm very concerned with roads being transformed in such a way as to stop and slow major arteries in neighborhoods creating slow downs that resulting build up of exhaust in neighborhoods. Also the idea of safety needs to include nighttime access and proximity concerns, poor snow removal issues when need for parking is being addressed.
- Scrap the Regional Bicycle Transportation Network and develop a Regional Active Transportation Network
- Focus more on fact based engineering metrics and less on social engineering. All solutions should be on the table, and you should stay away from political policies like anti-lane expansion policies of the past. Roadway solutions like expansion need to be equally considered and not always push transit based options or requirements.



- More frequent meetings with cities/agencies on long range planning efforts. Across the metro area, some cities appear to be well organized in their regional planning efforts while others don't. This is perhaps a local issue vs regional
- It often feels, especially with light rail, that routes are already decided before they reach public comment or city approval. And with no flexibility to change to a different mode once the process is past a certain point, residents are often left out of the discussions about mode and can only affect change at the margins. Metro Council staff are also condescending to city officials. At one public meeting where city officials sought to restore amenities that had been cut, Jim Alexander of the SWLRT project office lectured the council about the project not having infinite money -- when his office was the one that blew the budget. The Office of the Legislative Auditor report on Southwest Light Rail is also damning. Met Council should not be in the business of building LRT anymore. They suck at it. Find someone else better at managing projects and containing costs. Finally, the Met Council undermines its reputation by cajoling cities into sacrifices it says are essential and then abandoning them when money falls short. For example, Hopkins forfeited 2 percent of its tax base for a maintenance facility that Met Council felt necessary. When costs exceeded budget, the facility was cancelled but Met Council held onto the land in case it needed it again. Why did the Met Council insist that it had to build a new maintenance facility and compel Hopkins to give up a substantial portion of its tax base for something that turned out not to be as mandatory as they originally said? The same thing happens with parking. We're building these bright and shiny new LRTs but denuding the areas around them with parking.
- Make I 94 at grade. And push all the through traffic to 494
- With an elected council
- Get rid of the Met Council participation. Its a joke!!
- The Met Council could adopt the stance that more VMT is harmful to our metropolis (e.g., particulate pollution from tires and brakes) and focus its time and resources to providing alternatives to automotive travel and disincentivizing automotive travel.
- Better balance across the metro areas. Now it is overly focused on Mpls, St Paul & the affluent West Metro
- I feel that it would be helpful to receive a map/chart of the metro area every four months or so shoeing the transportation infrastructure that is currently in place, along with the additional infrastructure that is planned for the future. Particular projects that are being worked on could be highlighted in the map/chart. It would give us a better idea of where we are and where we're going with our transportation facilities/infrastructure.
- Delivery system and messages to the public about delays and or budget overages seems to draw negative opinion on how the tax money is used. Met Council gets the blame, there must be a better way to inform the public without upsetting everyone and drawing in criticism.



- Work to ensure the influence of all stakeholders is always fairly balanced. More focus on routes to schools, grocery stores, and health clinics. Considering the long term impacts on limited water supplies in far west metro communities when road investments help spur growth.
- The documents are much too long. Streamline the process.
- Focus less on highways and more on transit, which is more efficient, sustainable, and equitable. Spend LESS time on endless feedback and studies and committees, and actually BUILD transit projects.
- Make the projects pay for themselves. If you put in a train, make sure people don't cheat and ride without paying and make sure the fees pay for the annual cost of the train.
- Staff driven Metropolitan Council agenda seems to drive all planning process, rendering outside input ineffective. Additionally, the lack of hybrid meeting options has made participation more difficult.



C.3 Written Comments



December 30, 2024

Federal Transit Administration, Region 5
200 West Adams Street
Suite 320
Chicago, IL 60606

RE: Metropolitan Council – Transportation Management Area Certification Public Comment

To Whom It May Concern:

On behalf of the Minnesota Valley Transit Authority (MVTA), we appreciated the opportunity to meet with the Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) on November 12th to discuss the Metropolitan Council's Transportation Management Area Certification review. This meeting provided an opportunity to discuss MVTA's role in the regional network and identify steps necessary for compliance with federal standards while maintaining efficient transit services.

In response to the public comment request on the Certification, I submit the following remarks on behalf of the MVTA Board of Commissioners. This letter outlines how the Metropolitan Planning Organization (MPO) affects MVTA's operations, including communications, planning, fleet management, financial strategies, grant applications, and procurement activities, and highlights areas for improvement.

Transit Planning

The previous audit recommended that the Council establish regular meetings to discuss transit-related activities in the planning process. In response, the Council initially set up CEO meetings for all transit CEOs, which fostered collaboration. However, these meetings are now scheduled inconsistently, and email communication has become the primary method of interaction between MVTA and the Metropolitan Council. The lack of consistent in-person engagement has led to gaps in cross-communication, and the overall transparency of the planning process remains minimal. As a result, the opportunity for meaningful dialogue and collaboration between the Council and transit providers has diminished.

The previous audit also recommended that the Council execute a written agreement with all transit providers that formalizes their role(s) in the planning process. While this was completed, MVTA sees it as a first step to the Council improving coordination with regional transit providers overall. As noted in the previous paragraph, MVTA believes that the actions behind the written agreement can be improved. While formal opportunities to comment on Council-led planning processes exist, feedback is often procedural, and it is often unknown how feedback is integrated into final plans/outcomes. The Council's internal decision-making processes frequently exclude substantial input from MVTA and other regional transit providers, resulting in key funding and policy decisions that impact all regional transit providers. While initial strides have been made, a more inclusive, transparent, and collaborative approach, as recommended by the FTA's previous audit, is needed to address these challenges.

Fleet Management

MVTA continues to work with the MPO to replace and expand its federally funded fleet, but significant delays persist due to insufficient proactive planning and overly complex processes. These delays hinder MVTA's ability to meet growing transit demand and affect service reliability. MVTA has implemented strategies such as right-sizing vehicles, optimizing fleet utilization, and



streamlining procurement to mitigate these delays. However, procedures for fleet component repairs and replacements remain cumbersome, leading to prolonged vehicle downtimes. These inefficiencies compromise MVTA's ability to provide reliable transit services. The MPO must prioritize the alignment of fleet decisions with transit providers' operational needs and expedite fleet replacement and maintenance decisions.

Additionally, the noted complexities are exacerbated by a lack of clear understanding by the MPO on what the appropriate size of MVTA's fleet should be. MVTA disagrees with the MPO's interpretation of MVTA's VOMS requirement and respectfully asks that the FTA meet with MVTA and MPO staff to provide clarity and guidance on this matter.

Financial Strategies

The allocation of federal formula funds (5307) through the MPO continues to lack transparency, creating challenges for MVTA. The previous audit recommended that the Council clarify how funds are distributed among regional transit providers. Since then, no action has been taken, and the confusion around this process has intensified for MVTA. The introduction of a new state funding source in 2023 has further compounded this issue, as funding allocations will remain uncertain for up to 30 months. This uncertainty undermines MVTA's ability to plan effectively for long-term financial needs. MVTA is also not consulted during developing the Transportation Improvement Plan (TIP). There is no communication from the Council regarding the TIP, and MVTA relies on publicly posted agendas to determine if its projects are included. Decisions with significant financial impacts, such as installing regional farebox systems, are made without adequate collaboration or transparency. While installation costs are covered by the Council, ongoing expenses fall on MVTA, adding unplanned financial burdens. Additionally, changes to regional fare structures were communicated to MVTA through public media rather than direct consultation, highlighting a lack of engagement. The MPO must improve communication and establish equitable financial policies that support the needs of all transit providers.

Grant Applications and Procurement

MVTA depends on the MPO's support for federal procurements, contracts, and grant opportunities, including processes such as TIP inclusion, NEPA compliance, and Disadvantaged Business Enterprise (DBE) assessments. However, these processes are often reactive, lack clear documentation, and fail to establish consistent requirements. A recent oversight in the MPO's grants division, which failed to coordinate with the Council's Office of Equity and Equal Opportunity on DBE requirements, resulted in two vendors not receiving adequate DBE information and an error in their submission, deeming them non-responsive. MVTA was able to award to the third low bidder, the price increase from the first to the third low bidder was an increase of \$1.047 million. Furthermore, the MPO has not submitted grant applications on MVTA's behalf in a timely manner, causing delays and straining critical timelines. These delays have added to the burden of grant submissions, which require up to three weeks for review. Additionally, routing grant submissions through Metro Transit—a competing entity within the MPO—creates a conflict of interest. These issues highlight the need for improved communication, better documentation, streamlined processes, and eliminating conflicts of interest to ensure efficient and equitable grant administration.

The challenges outlined above highlight the need for greater transparency, responsiveness, and collaboration between the MPO and MVTA. Federal planning law emphasizes a "continuing, comprehensive, and cooperative" (3C) planning process that treats all stakeholders as equal partners. To meet this mandate, the MPO must prioritize meaningful engagement with MVTA, address their operational and financial needs, and ensure the equitable distribution of resources. MVTA remains committed to working with the MPO and other regional partners to build an effective and inclusive transportation network.



Thank you for your time and attention.

Respectfully,

Dan Kealey
MVTA Board of Commissioners Chair

Luther Wynder
MVTA Chief Executive Officer

CC: Bill Wheeler, FTA Lead Community Planner
Susan Weber, FTA Community Planner



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



APPENDIX D - LIST OF ACRONYMS

ADA: Americans with Disabilities Act
AMPO: Association of Metropolitan Planning Organizations
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
HSIP: Highway Safety Improvement Program
ITS: Intelligent Transportation Systems
LEP: Limited-English-Proficiency
M&O: Management and Operations
MAP-21: Moving Ahead for Progress in the 21st Century
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
TPP: Transportation Policy Plan
U.S.C.: United States Code
UPWP: Unified Planning Work Program
USDOT: United States Department of Transportation





Report prepared by:

FHWA - Minnesota Division
180 East Fifth Street
Suite 930
St. Paul, MN, 55101

FTA - Region 5
200 West Adams Street
Suite 320
Chicago, IL 60606
United States