

**Meeting Agenda of the  
TRANSPORTATION ADVISORY COMMISSION  
January 14, 2016  
8:30 a.m.**

**Community Room of the Pueblo Municipal Justice Center, 200 South Main Street**  
Agenda items marked with \* indicate additional materials are included in the packet.

**Individuals Requiring Special Accommodations Should Notify the City MPO's  
Office (719) 553-2244 by Noon on the Friday Preceding the Meeting.**

- 1. Call Meeting to Order**
- 2. Introductions and Public Comments (non-agenda items only).**
  - **Alan Nelms – Appointed by PACOG Board December 3, 2015**
- 3. Approval of Minutes\***  
November 5, 2015  
**Action Requested: Approve/Disapprove/Modify**
- 4. CDOT Region II TIP/STIP Policy Agenda Item(s)**  
*There are no Policy TIP Amendment Notifications for January*
- 5. CDOT Region II TIP/STIP Administration Agenda Item(s)\***  
*CDOT Region II has Notification of Three (3) Administrative Amendments of Roll Forward Project Funding to the PACOG Transportation Improvement Program (TIP) and Statewide Transportation Improvement Program (STIP) in the MPO/TPR area. Additional Information is Available in the Attached Letter and Spreadsheet.*  
**Notification: No Action Required**

Project Name: 2015 Emergency and Permanent Repair Funding  
STIP Number: SR27006.005  
Project Location and Description: **North Creek - North**  
Federal Program Funds: \$ **459,960**  
State Matching Funds: \$  
Local Matching Funds: \$ **114,990**  
Other Project Funds: \$  
**TOTAL PROJECT FUND AMENDMENT: \$574,950**

Project Name: 2015 Emergency and Permanent Repair Funding  
STIP Number: SR27006.006  
Project Location and Description: **North Creek – South**  
Federal Program Funds: \$ **472,680**  
State Matching Funds: \$  
Local Matching Funds: \$ **118,170**  
Other Project Funds: \$  
**TOTAL PROJECT FUND AMENDMENT: \$590,850**

Project Name: 2015 Emergency and Permanent Repair Funding

STIP Number: SR27006.007

Project Location and Description: **Overton Road**

Federal Program Funds: \$ **2,297,060**

State Matching Funds: \$

Local Matching Funds: \$ **574,265**

Other Project Funds: \$

**TOTAL PROJECT FUND AMENDMENT: \$2,871,325**

**6. *Prioritization of 2040 LRTP Trail Projects***

- City Projects\*
- Pueblo West Projects
- Other

**7. *2040 LRTP Update***

**8. *PACOG Planning Review Report – Review Recommendations\****

**9. *Staff Reports:***

- *Update on West Pueblo Connector Kickoff Meeting\**

**10. *Items from TAC members or scheduling of future agenda items.***

**11. *Adjourn at or before 11:00 am.***

**Minutes of the  
TRANSPORTATION ADVISORY COMMITTEE**

**Nov. 5, 2015**

**8:30 a.m.**

**HR Conference Room 301 W. B Street**

Agenda Items Marked with \* indicate additional materials included in packet

**1. Call Meeting to Order**

*Chairman: Scott Hobson*

*Time of Call: 8:35 a.m.*

*MPO Members Present: Scott Hobson, Reyna Quintana*

*TAC Members Present: Alf Randall, Dan Centa, Darrin Tangeman, Jeff Woeber, Michael Cuppy, Pepper Whittleff, Wendy Pettit*

*CAC Members Present: Kristen Castor, Salvatore Piscitelli*

*Others Present:*

**2. Introductions and Public Comments (non-agenda items only).**

*Introductions were done for the benefit of Darrin Tangeman.*

**3. Approval of Minutes of the regular meeting held on September 3 & October 1, 2015**

*Motion to Approve: Sal Piscitelli*

*Second: Kristen Castor*

*Unanimous*

**4. CDOT Region II TIP/STIP Regular Agenda Item(s)**

*There were no Policy Notifications for November.*

**5. CDOT Region II TIP/STIP Administrative Notification**

*CDOT Region II had notification of three (3) administrative amendments to the PACOG Transportation Improvement Program (TIP) and the Statewide Transportation Improvement Program (STIP) in the MPO/TPR area.*

Project Name: **US 50 B East of Boone**  
STIP Number:  
Project Location and Description: US 50-Surface Treatment  
Fiscal Year(s) and Fund Source(s):  
Federal Program Funds: **\$1,813,100**  
State Matching Funds: **\$ 376,900**  
Local Matching Funds: **\$**  
Other Project Funds: **\$**  
**TOTAL PROJECT FUND AMENDMENT: \$2,190,000**

*This project will perform a minor rehab on the surface of the highway between MM 69.5 and 76.2.*

Project Name: **US 50 B to Junction SH 96B**  
STIP Number:  
Project Location and Description: US 50-Surface Treatment  
Fiscal Year(s) and Fund Source(s):  
Federal Program Funds: **\$1,204,590**  
State Matching Funds: **\$ 250,410**  
Local Matching Funds: **\$**  
Other Project Funds: **\$**  
**TOTAL PROJECT FUND AMENDMENT: \$1,455,000**

*This project will perform a minor rehab on the surface of the highway between MM 0.0 and 5.9.*

### ***Change in CDOT/FHWA procedure***

*Wendy Pettit explained that the remainder of the projects shown on the spreadsheets in the packet are projects that were programmed in the previous TIP but were not completed in that time. Therefore these projects needed to be "rolled forward" and put into a separate section of the TIP called the "Roll Forward" section. The latest TIP including the Roll Forward section will be posted on the PACOG website.*

### **6. PACOG Bylaws\***

*At the October meeting Don Bruestle inquired what the roll of PACOG is. In order to explain PACOG's role and purpose, the bylaws were included in this month's packet. The purpose of the PACOG Board is found on page 1 of the bylaws. Kristen Castor asked if the bylaws were subject to change dramatically. Scott explained that PACOG is looking at restructuring a little and adding more areas to their membership such as Boone, etc. He stated they are also wanting to start separate committees for specialized areas. Darrin Tangeman asked if the proportion of membership will be looked at in the review of PACOG. He gave the example that Pueblo West has 19 percent of the population but only one voting member on the PACOG Board. Scott replied that this will something they look at.*

### **7. 2040 LRTP Update**

*Scott informed the TAC that chapters 1 through 6 in draft form are posted on the PACOG website. Once the entire draft LRTP is on the website, we will send out an email for the 30 day comment period. Pepper asked if the corridor preservation plan will be available in the 2040 LRTP. She stated that the corridor preservation plan is the only mechanism there is to request ROW. Scott stated that it will not be in the 2040 LRTP due to the fact that it is not a requirement of the plan but that we will be able to get that plan as a separate action through PACOG because of its importance.*

### **8. Staff Reports**

- ***West Pueblo Connector***

*Scott informed the TAC that there were two proposals for the West Pueblo Connector study. They were Matrix Design Group and Felsberg Holt & Ullevig. Both proposals were very good but Matrix Design Group was selected for the study. The contract is on the agenda for the November 9 Council meeting.*

- ***Additional Staffing Positions\****

*Two positions are going through Council. They are the Transportation Program Manager and the Transportation Planning Technician. Scott stated that they will hopefully be advertised in December. These two positions are combining what we had in temporary part-time positions and creating full-time positions. They are also a transition plan for when Scott retires.*

- **CAC Membership Application**

*The application to fill the vacant CAC position is posted on the PACOG website and has been advertised in the Pueblo Chieftain. We are looking at appointing a new member at the December PACOG meeting.*

## 9. Attachments

- **Federal Transportation Bill Comparison\***

*Scott informed the TAC that the FHWA funding has been extended again. Both the House and the Senate are continuing work on a new Transportation Bill. Scott said that the handout showed that the House version of the new bill allowed for STP Metro money for MPO's over 200,000 people. He asked the TAC to allow recommendation to the PACOG Board to write a letter of support allowing STP Metro funds for MPO's under 200,000.*

*Motion to Approve: Sal Piscitelli*

*Second: Dan Centa*

*All in Favor*

*Scott said that once a letter was drafted he will send it out to the TAC.*

- **State Transportation Commission Meeting Summary\***

*The State Transportation Commission Meeting Summary was included for review.*

## 10. Additional Items

- *Scott mentioned that one of the tasks for the upcoming year is that all MPO's need their own Title VI policy therefore PACOG will need to adopt one and make sure we are accommodating for any special use at the meetings. In addition we will need to make sure our projects are in compliance with Title VI.*

- **Transportation Summit**

*Scott asked for the TAC members who attended the Transportation Summit event to share their thoughts. Kristen Castor stated that it was interesting that there were higher level participants from other countries that were concerned with mass transit, but the meeting was more concerned with self-driven smart cars and other forms of technology. Darin Tangeman stated that mass transit would be incorporated but Kristen was right that it was mostly technology focused with implementation within the next 3 to 5 years.*

## 11. Adjournment

Chairman Scott Hobson adjourned the meeting at 10:10am





Region 2 Planning  
905 N Erie Ave  
Pueblo CO 81001-2915

December 23, 2015

To: PACOG  
211 E. D Street.  
Pueblo, Colorado 81003  
(719) 553-2244 FAX (719) 549-2359

CDOT Region II request(s) for PACOG MPO/TPR TIP amendment(s)  
FY 2016-2019 Transportation Improvement Program

Administrative notification of Roll Forward Project Funding or TIP/STIP Policy amendment(s) in the MPO and TPR area(s) -no TAC or Board action required.

Administrative Action: Flood recovery funding for the Pueblo area

Project Name: 2015 Emergency and Permanent Repair funding  
STIP Number:SR27006.005

Project Location and Description: **North Creek - North**

Federal Program Funds: \$ 459,960

State Matching Funds: \$

Local Matching Funds: \$ 114,990

Other Project Funds:

**TOTAL PROJECT FUND AMENDMENT: \$574,950**

Project Name: 2015 Emergency and Permanent Repair funding  
STIP Number:SR27006.006

Project Location and Description: **North Creek - South**

Federal Program Funds: \$ 472,680

State Matching Funds: \$

Local Matching Funds: \$ 118,170

Other Project Funds:

**TOTAL PROJECT FUND AMENDMENT: \$590,850**

Project Name: 2015 Emergency and Permanent Repair funding  
STIP Number: SR27006.007

Project Location and Description: **Overton Road**

Federal Program Funds: \$ 2,297,060

State Matching Funds: \$

Local Matching Funds: \$ 574,265

Other Project Funds: \$

**TOTAL PROJECT FUND AMENDMENT: \$2,871,325**





**COLORADO**  
Department of Transportation  
Region 2

Region 2 Planning  
905 N Erie Ave  
Pueblo CO 81001-2915

Please let me know if you have any additional questions about the proposed Administrative Notifications.

Sincerely,

Wendy Pettit  
CDOT Region 2 Planning

Cc:

Julia Spiker (OFMB)  
Ajin Hu (R2 SPE)  
Karen Rowe (R2 RTD)  
Jason Ahrens (R2 BO)  
Michael Snow (DTD)



## City of Pueblo Trail Priorities

- Wildhorse Creek up to Highway 50 and YMCA
- Highway 50 from Wills to P. Blvd
- Crossing over I-25 and Fountain Creek from Mineral Palace Park
- Levee Trail
- Northern and Prairie to State Fairgrounds
- Goodnight Arroyo / AVC Trails
- Trail Connections to Arkansas River Trail at the following locations:
  - Adjacent to Reservoir Road
  - South of Dutch Clark Stadium
  - Spring Street
  - City Park

## Trail Bridges across Arkansas River

- Nature Center to Chain-of-Lakes
- North of Union Avenue – Connects trail on levee to trail along bluff  
(In conjunction with levee project)
- South of 4<sup>th</sup> Street – Connects trail on levee to trail along bluff  
(In conjunction with levee project)





U.S. Department  
of Transportation

**Federal Highway  
Administration**

**Colorado  
Division**

Federal Highway  
Administration  
(FHWA)

**Region 8**

Federal Transit  
Administration  
(FTA)

**CDOT**

Colorado  
Department of  
Transportation

# Program Review



U.S. Department  
of Transportation

**Federal Transit  
Administration**



**COLORADO**

Department of Transportation

Division of Transportation Development

## **Pueblo Area Council of Governments (PACOG)**

## **DRAFT Transportation Planning Review**

**November 2015**



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## Executive Summary

A metropolitan planning organization (MPO) planning review of the Pueblo Area Council of Governments (PACOG) was completed over a period of several months in 2014 and 2015. The review was a joint effort between Federal Highway Administration (FHWA) Colorado Division, Federal Transit Administration (FTA) Region VIII, and the Colorado Department of Transportation (CDOT).

The purpose of this review was to determine the extent of consistency with Federal and State transportation planning requirements, to recognize noteworthy practices, to identify problem areas, and to provide assistance and guidance to PACOG where appropriate. The review was done in the spirit of cooperation with the shared goal of enhancing the quality of the transportation planning process in the region. The review team evaluated and discussed the major transportation planning process components and specific focus areas identified by MPO staff, CDOT, FHWA and FTA during the review period. The review team wants to acknowledge the MPO Director who participated collaboratively with the team during the review, contributing significantly to the background and discussion on several topics and has actively sought improvements in many areas of concern, both before and since the initiation of this review.

The review team recognizes PACOG is a smaller MPO with limited resources resulting in challenges in meeting its list of required transportation planning responsibilities. On this account, PACOG is not alone as an MPO. Numerous studies, surveys and reports over the years have repeatedly determined that MPOs of all sizes, but especially those like PACOG, face resource, staffing, authority and technical challenges that significantly impact their ability to conduct effective transportation planning.

While PACOG's transportation planning process is technically compliant and adequate for the minimums required by statute and regulation, there is concern that some past and ongoing transportation planning efforts lack the robust and thorough qualities needed to meet their demands. This report also identifies where some minor compliance issues exist and illustrates instances where PACOG will need to focus resources to accomplish new requirements demanded of MPOs nationwide, such as performance based planning and programming (PBPP) and performance management included in the pending Federal transportation program rulemaking. Because the MPO has experienced substantial staffing changes resulting in institutional knowledge loss for an extended period of time, there is concern about the degree of organizational and regional awareness of the MPO's responsibilities, its purpose and the value quality transportation planning brings to the Pueblo region.



The above concerns were reasons for conducting this Planning Review, as partially evidenced by the following:

1. Underutilization of planning resources as reflected by the accumulation of significant amounts of unspent yearly Consolidated Planning Grant (CPG) funds.
2. Recent concerns that PACOG lacks policies and processes to identify and track expenditures on projects, and a prolonged condition of lacking policy or systems that communicates the eligible use of funds or that provides accountability to the public.
3. Continuing pattern of limited, unclear progress on MPO activities and delays in delivering MPO work products, required reports or CPG invoices.
4. The concern of some members of the PACOG Board of Directors as to whether the current PACOG structure and bylaws adequately provides for the fair representation of interests of all member entities related to MPO activities.
5. Incomplete awareness of transportation planning processes generally by the PACOG Council and Transportation Advisory Committee (TAC) and resulting low levels of engagement in transportation planning matters that are relevant to the region and state or during planning product development events and activities.
6. The MPO lacks prominence in the community as the leader in the implementation of strategies driven by its stated transportation vision and goals.

The review team wants to highlight that PACOG has an opportunity to take advantage of certain regulatory flexibilities due to its size and regional composition, while also thinking in a creative and innovative fashion to meet organizational, human capital, and technical challenges. Several of the actions contained within this report are intended to assist PACOG in meeting the challenges before it, as well as improving the overall quality of the transportation planning process for the Pueblo region.

Over the past few years, FHWA, FTA, and CDOT staff worked cooperatively with the current PACOG MPO Director on MPO challenges, including providing direction on eligible activities funded by FHWA CPG funds, development of a new travel demand model, MPO staffing changes, and addressing new planning requirements. FHWA, FTA, and CDOT are committed to providing ongoing guidance and technical assistance to PACOG while it implements the required actions and recommendations resulting from this review.



## Summary Required Actions & Recommendations

The review team identified several topic-based Observations, with respective Required Actions and Recommendations for PACOG to implement. The body of this document provides details of these Observations, as well as the regulatory basis for the Required Actions and Recommendations.

The following are the **Required Actions** identified by the Review team that are mandatory steps PACOG must take to meet Federal and State planning regulations and rules:

### **MPO Responsibilities**

1. PACOG must ensure it has appropriate and adequate staff and resources to support a robust planning process and produce quality transportation planning deliverables in the future such as TIP, UPWP, LRTP, invoices and reports on time and as specified in the UPWP.
2. PACOG must prepare to meet new MAP-21 Performance Measures and Performance-Based Planning and Programming requirements, and fully address rulemaking requirements, on or before deadlines, that pertain to transportation planning and programming.
3. PACOG will conduct regular coordination meetings, as frequently as is necessary or is efficient, between PACOG, CDOT, FHWA, and FTA.
4. The PACOG Council must ensure its representation at STAC meetings be by individuals formally recognized and appointed by the Council as STAC Representative or Alternate. PACOG must keep representation current and promptly notify CDOT in writing of any change in STAC representation.
5. The PACOG Council must encourage their STAC Representative attend STAC meetings regularly and in person whenever possible to maintain continuity in their role. Other STAC Alternates are also encouraged to attend regularly, but, as a general rule, Alternates should not regularly substitute as the designated Representative.

### **MPO Staffing**

6. City of Pueblo, as the delegated authority for conducting the tasks of the MPO, needs to ensure it fulfills its transportation planning responsibilities and commitments by managing the MPO as a self-directed entity rather than an integrated department within the City.
7. The MPO Director needs to be able to dedicate adequate time to support MPO activities and to successfully administer the annual work plan, without conflict with other City responsibilities, and to be accountable to devoting the proportion of his or her time committed in the MPO's staffing and work plan.



8. Develop and maintain an MPO personnel directory showing roles and responsibilities; publish this information along with its staffing plan publicly and provide CDOT a copy of the personnel directory whenever it is changed.
9. PACOG shall develop a staffing and succession plan addressing all MPO staff, but, in particular, the MPO Director and Socio-Economic Planner positions.

#### **Agreements and Bylaws**

10. Review and revise the Transportation Planning and Programming MOA to address MAP-21, TIP, and STIP development and amendment processes, and other newer requirements.
11. During the next fiscal year the PACOG Board shall consider amending its Bylaws to clearly describe and define the roles and responsibilities of the TTC and CAC.

#### **Contracting and Reporting**

12. PACOG must adhere to CPG contractual obligations to submit invoices on a monthly basis and within 30 days after the close of each month.
13. PACOG must adhere to CPG contractual obligations and Federal requirements including Super Circular (2 CFR 200) to submit deliverables before deadlines.

#### **Public Involvement**

14. The PACOG website must include the most recent version of the PACOG Public Participation Plan and other planning products.
15. The PACOG website needs to contain up-to-date information, and PACOG staff needs to be accountable for posting current and timely information to the website on past and upcoming meetings, public events and other useful public information.
16. PACOG must keep its Public Participation Plan current as well as track and report on the progress and effectiveness of the strategies identified. PACOG shall include a task and resources in the FY 2016-2017 UPWP to review and revise the PACOG Public Participation Plan, including consideration for any renewed or new efforts based on the results of this review. The Public Participation Plan revision must occur during FY 2016.
17. The public participation process described in the PPP needs to include explicit procedures, strategies, and outcomes for seeking out the “traditionally underserved”, as per 23 CFR 450.316(a) (1) (vii).

#### **Unified Planning Work Program (UPWP)**

18. To meet the Super Circular requirements, the PACOG FY 2016-17 UPWP must have project beginning and end dates authorized by CDOT and FHWA for all stand-alone projects.
19. Proper summary and supporting documentation must be provided in CPG invoices to demonstrate clearly as to which UPWP work task each staff time expense is attributed.
20. Before any work using CPG funds begins, the activity must be included or amended into the FHWA and CDOT approved PACOG UPWP.
21. Develop a new format or organization of the FY 2016-2017 PACOG UPWP that concisely describes the planning activities, the estimated cost for each activity or task, who



performs the work, the schedule for completing the work, the resulting products, a summary of the total amounts, and the sources of federal and matching funds budgeted.

22. The organization of the UPWP must align with PACOG's accounting, record-keeping and invoicing practices to enable the UPWP to serve as a tool to track and report ongoing progress on work elements, guide the activities of the MPO staff and appropriately allocate the financial resources of the MPO for the two-year period.
23. The FY 2016-2017 UPWP needs to contain a strategy to spend down the carry-over funds and assign the funding to its current, shorter-term activities and the longer-term work necessary to implement the required actions in this report.
24. If MAP-21 rule-making is finalized prior to completing the FY 2016-2017 UPWP, the UPWP needs to specifically include task(s) PACOG will complete to address how MAP-21 regulatory requirements will be met in the planning process.

#### **Transportation Planning Process**

25. PACOG needs to address MAP-21 and CDOT PD14 PBPP performance management requirements in the development of its LRTP and TIP.

#### **Transportation Improvement Program**

26. PACOG needs to appropriately address MAP-21 planning and performance requirements after final rulemaking are done to meet the regulatory requirement.
27. The TIP should be used as a management tool for monitoring progress in implementing the transportation plan. The PACOG TIP should expressly identify the criteria and process for prioritizing implementation of the transportation plan elements, and any changes from the previous TIP.
28. After the 2040 LRTP is adopted and MAP-21 rule-making finalized, PACOG will need to transition toward MAP-21 performance management implementation with the TIP reporting on the LRTP.

#### **Annual List of Obligated Projects**

29. Prior to December 31<sup>st</sup> of each year, PACOG is required to make available a list of projects for which *all* Federal funds were obligated, in accordance with the information requirements of 23 CFR 450.332. A dated cover sheet, such as provided in 2012, or report must be included to demonstrate PACOG is meeting the December 31<sup>st</sup> deadline.
30. PACOG should review the information CDOT provides to the MPO each year for accuracy and completeness of all reportable project types and modes, and provide evidence the MPO agrees with the project list.

#### **Travel Demand Model**

31. Include within the FY 2016-2017 UPWP appropriate resources reflecting intention to maintain and update the travel demand model and support training for staff and member agency users of the model.



### **Title VI, Environmental Justice and LEP**

32. PACOG shall adopt its own Title VI (Civil Rights act) and other nondiscrimination complaint procedures, and the procedures should be posted on the PACOG website.
33. During the next update of PACOG's Public Participation Plan and/or LRTP, clearly explain the Environmental Justice analysis process for the MPO, and how it is utilized in the planning process and in the development of the Title VI Program.
34. During the next update of PACOG's Public Participation Plan clearly explain the PACOG LEP process, its goals and challenges.

In addition to the Required Actions stipulated in this report, the review team further developed a number of **Recommendations** that either support the Required Action and/or entail additional actions PACOG should consider in addressing the issues identified throughout the review. While not mandatory for the sake of compliance with planning requirements, it is expected PACOG will act upon these Recommendations in the manner it deems most effective or, if not, provide explanation throughout subsequent planning coordination efforts as to its alternative approach to the issues identified. **Appendix I: Required Actions and Recommendations Matrix** serves as a quick reference and implementation guide by topic area.



## Review Team Members

### **FHWA Colorado Division**

Bill Haas, Program Development Team Leader

Tricia Sergeson, Environmental/Planner PDP

### **FTA Region 8**

Larry Squires, Community Planner

Yelena Onnen, Transportation Program Specialist

### **Colorado Department of Transportation**

Michael Snow, MPO Planning Liaison, Division of Transportation Development

Wendy Pettit, Planner in Engineering Region 2



## Purpose and Objectives

The purpose of this review was to determine the extent of consistency with Federal and State transportation planning requirements, to recognize noteworthy practices, to identify problem areas, explore opportunities and to provide assistance and guidance, where appropriate, to PACOG. The review was done in the spirit of cooperation with the shared goal of enhancing the quality of the transportation planning process in the region. The review team evaluated and discussed the major transportation planning process components and specific focus areas identified by MPO staff, CDOT, FHWA and FTA during the review period. The review team wants to acknowledge the MPO Director who both collaborated with the team during the review and initiated discussion of certain issues to seek improvements.

The review process is one of several methods used to assess the quality of a metropolitan transportation planning process, including compliance with applicable statutes, regulations and guidance and the level and type of technical assistance needed to enhance the effectiveness of the process. The Stewardship Agreement and other documented procedures guide routine ways FHWA, FTA, and CDOT are involved in oversight of PACOG including review and approval of planning products, review and payment of CPG billings, review of reports, attendance at MPO meetings and events and coordination meetings.

Over the past few years, FHWA, FTA, and CDOT staff worked cooperatively with the current PACOG MPO Director on MPO challenges, including providing direction on eligible activities funded by FHWA CPG funds, development of a new travel demand model, MPO staffing challenges and addressing new planning requirements.

A Metropolitan Planning Area (MPA) is comprised of an urbanized area, defined by the U.S. Census Bureau as having a population greater than 50,000, and the area expected to urbanize in the next 20 years. Furthermore, urbanized areas larger than 200,000 populations are planning areas designated as Transportation Management Areas (TMA). For TMAs, the metropolitan transportation planning and programming process is required to be formally reviewed at least once every four years by FHWA and FTA. Since the PACOG area has a population less than 200,000, there is no requirement to complete a formal planning certification review of the metropolitan transportation planning process.

PACOG self-certifies, in accordance with Federal Regulations, that the MPO is carrying out a continuing, cooperative and comprehensive (3C) metropolitan transportation planning process. The certification is made at the time the transportation improvement program (TIP) is adopted by the PACOG Council. The self-certification is co-signed by the CDOT Executive Director. The most recent self-certification occurred in the May 2015 along with the adoption of the PACOG FY2016-2019 TIP.



This review focused on the overall transportation planning in the region, which inclusively defines the "planning process elements," such as the: long-range transportation planning process, LRTP, TIP, shorter-term planning tasks, UPWP, and other planning products such as the travel demand model, public involvement plan, and Title VI of the Civil Rights Act of 1964.

While PACOG, as a Council of Governments, is charged with responsibilities in addition to transportation planning, "PACOG" and "MPO" are terms used interchangeably in this report and are considered, for this review, to have the same meaning, but with respect only to its role as MPO.

DRAFT



## Scope and Methodology

This is the first planning review of PACOG conducted by FHWA, FTA and CDOT. This joint effort between Colorado Department of Transportation (CDOT) and USDOT is consistent with the Stewardship and Oversight agreement between the FHWA Colorado Division and CDOT. This review has occurred over a period of approximately sixteen months in 2014 and 2015, has included a desk review and several meetings and phone calls with MPO staff, and will continue through its implementation.

The planning review focused on compliance with Federal regulations and State of Colorado requirements. The review further highlighted challenges and successes of the MPO and the region, and it served as an opportunity to improve the effectiveness and efficiency of the metropolitan planning process in the Pueblo County region.

To develop an understanding of the underlying assumptions and justifications for the primary planning procedures in the Pueblo region, the review team examined the following work products:

- PACOG 2035 Long-range Transportation Plan (LRTP)
- PACOG Draft 2040 LRTP
- Fiscal Year (FY) 2012-2017 Transportation Improvement Program (TIP)
- FY2014-FY2015 Unified Planning Work Program (UPWP)
- FY2016-FY2017 UPWP
- Public Participation Plan (PPP)

The Required Actions and Recommendations are organized by the following topic areas:

- MPO Responsibilities
- MPO Structure
- MPO Staffing
- Agreements and Bylaws
- Contracting and Reporting
- Public Involvement
- Unified Planning Work Program (UPWP)
- Transportation Planning Process
- Long Range Transportation Plan
- Transportation Improvement Program
- Annual Listing of Obligated Projects
- Travel Demand Model
- Title VI, Environmental Justice and LEP



Of particular importance in this Planning Review is the differentiation between the Required Actions and Recommendations. Required Actions address technical improvements needed to improve processes and procedures and comply with planning rules and regulations. A required action can indicate that the program generally follows mandates in Federal and State law and regulations, but further refinement of procedures must be instituted based on current guidance and best practices.

Recommendations provide an extra perspective on processes that might have been overlooked but could provide benefits for the MPO, such as building relationships with supporting agencies and suggestions on process improvement. While not mandatory for the sake of compliance with planning requirements, it is expected PACOG will act upon them in the manner it deems most appropriate or, if not, provide explanation throughout subsequent planning coordination efforts as to its alternative approach to address the issues identified.

The report also has Current Status notes where specific actions are in progress and/or have already been implemented during the period of the planning review.



## MPO Description and Background

The Pueblo Area Council of Governments (PACOG) is the federally recognized metropolitan planning organization (MPO) for the Pueblo, Colorado, urbanized area (UZA). According to the 2010 US Census, the population of the Pueblo UZA was 136,550. Because the UZA is less than 200,000, it does not meet the population threshold of a Transportation Management Area (TMA).

The PACOG Council adopted an Adjusted 2010 UZA Boundary that was approved by the Colorado State Governor in 2014. The MPO boundary remains larger than the UZA Boundary. PACOG is also recognized as the Regional Planning Commission (RPC) for the Pueblo Area Transportation Planning Region (TPR), which encompasses the whole of Pueblo County and, therefore, represents the region in statewide and regional transportation planning processes, both urban and rural. The TPR boundary is the same as the Pueblo County boundary and the MPO areas is within the larger TPR area (see map). For the sake of this report, it should be noted that the subject of the planning review encompassed PACOG as the MPO only.

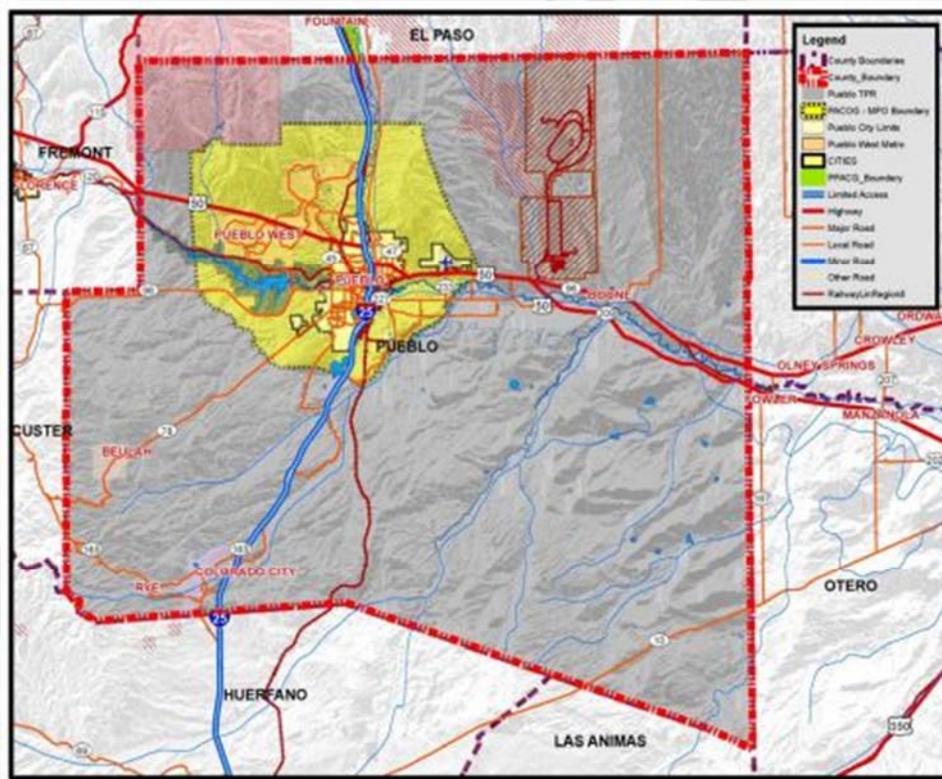
In addition to functioning as the MPO and the RPC for the Pueblo Area, PACOG is responsible, in its Council of Governments capacity, for environmental quality and water quality planning in the region. PACOG is authorized to receive Federal and State funds for programs including, but not limited to, regional land use, water quality, and transportation planning. The County Department of Planning and Development, through the County's delegation agreement with PACOG, administers its regional land use planning, administrative work tasks, and water quality planning. In addition, the PACOG Bylaws identify the following additional activities the organization may undertake:

- A. Serve as a mutual forum for identification, discussion, and voluntary resolution of community and regional needs and problems;
- B. Administer such programs as the PACOG shall by resolution undertake in furtherance of public purposes;
- C. Provide for the study and planning of regional improvement development and conservation and provide a means for carrying out the result of said studies and planning;
- D. Provide a mechanism and organization to obtain public and private input, discuss, study, plan, develop policy and administer programs concerning health, welfare, education, environment, housing, economic development, resources and manpower in the Pueblo Area;
- E. Provide a mechanism for fostering effective communication, cooperative efforts and collective action among governmental and other agencies in the Pueblo Area;



- F. Act as the applicant and supervising body for federal and state funded programs where authorized to do so under federal and state laws and regulations;
- G. Engage in all functions authorized and permitted by PACOG's organization ordinance; and
- H. Establish a mechanism to encourage local governments to cooperate in providing services to the public in order to gain the maximum benefit from taxpayers' dollars.

The City's Urban Transportation Planning Division, through the City's delegation agreement with PACOG, provides short-term and long-term transportation planning services through PACOG's adopted UPWP.



PACOG MPO is comprised of the following member entities (number of member entity Directors in parentheses):

- City of Pueblo (7)
- County of Pueblo (3)



- Board of Water Works (1)
- Pueblo City Schools (1)
- School District No. 70 (1)
- Pueblo West Metropolitan District (1)
- Colorado City Metropolitan District (1)
- Salt Creek Sanitation District (1)

The governing body of PACOG is known as the “Council” and this body generally meets monthly on the fourth Thursday. The voting members of the PACOG Council are officials from the local units of the government bodies listed above. Members do not serve terms and can remain on the Council as long as they continue in their elected or appointed positions. PACOG does not use any form of weighted voting and all voting members are able to vote on any matter before the Council.

The PACOG By-Laws stipulate the City Manager and the County Attorney jointly share the duties as Co-Executive Directors of the Council of Governments. The Assistant City Manager for Community Investment, Scott Hobson, currently serves as the MPO Director. The Director of Pueblo County Department of Planning and Development serves as the PACOG Manager and, prior to July 2014, shared in the management of various MPO projects.

The PACOG By-Laws set forth standing commissions and committees for transportation planning purposes, and other committees may be established by the Council as needed. The standing commissions and committees are:

- Transportation Advisory Commission (TAC) consisting of two standing committees:
  - Transportation Technical Committee (TTC)
  - Citizens Advisory Committee (CAC)

PACOG is a small MPO in size and resources, and is hosted by the City of Pueblo. There exists a delegation agreement between the MPO and the City of Pueblo that stipulates the transportation-related services the city provides for the MPO. City employees in the Urban Transportation Planning Division work on MPO tasks through various full-time and task-based staffing arrangements. The City also provides most of the administrative support including:

- Office space
- Parking
- Phone and computer systems
- Vehicles
- Human resource services



- GIS support
- Legal assistance
- Accounting and financial reporting

Pueblo County also provides resources to the MPO. Beginning in September 2013, PACOG amended the Delegation Agreement allowing County staff to assist the City in carrying out the transportation planning tasks outlined in MPO's UPWP. (The current 2015 Delegation Agreement is included as Appendix II).

Pueblo County currently provides the following assistance:

- Website hosting and support
- GIS data and system support and servers
- PACOG public meeting space
- Accounting and financial reporting

The Pueblo region is in compliance for the National Ambient Air Quality Standards (NAAQS) by the Environmental Protection Agency (EPA). This designation excuses the MPO from meeting the Clean Air Act State Implementation Air Plans and air quality conformity requirements when developing and updating the LRTP and TIP. Therefore, the MPO staff technical competencies do not need to focus on air quality modeling, NAAQS requirements, or expertise to perform air quality conformity determinations of the LRTP and TIP.

FHWA and FTA provide ongoing financial assistance to PACOG to accomplish transportation planning activities required by Federal laws and regulations such as the LRTP, TIP and UPWP. A 2009 Memorandum of Understanding (MOU) is the framework for implementation of the FHWA and FTA planning funds to MPOs into what is known as the Consolidated Planning Grants (CPG) program, which is administered by CDOT. Stipulated in the MOU is the CPG fund distribution formula by which PACOG is guaranteed to receive a minimum of \$350,000 of CPG funding each year. CPG contracts between CDOT and PACOG allow the MPO to incur eligible expenses and later claim reimbursement of CPG funds through CDOT.

The Stewardship Agreement between FHWA and CDOT directs the responsibility of day-to-day coordination and oversight of PACOG's MPO activities to CDOT. CDOT oversight includes execution of contracts and other agreements; administration of CPG funds; review, approval and reimbursement of PACOG invoices; monitoring of MPO planning activities and performance; and attendance by both Division of Transportation Development (DTD) and Region 2 staff at regular PACOG meetings and events. A CDOT DTD Liaison is assigned to provide ongoing support and coordination with the MPO. The CDOT Region 2 Planner is actively engaged in MPO affairs as well. The FHWA Colorado Division oversight activities includes review



and approval of the UPWP and amendments, approval of key planning products, technical assistance, attendance at the Mid-year and Year-end UPWP status meetings and monthly Statewide MPO meetings, periodic attendance at PACOG TAC meetings, and ongoing coordination meetings and correspondence with CDOT and PACOG staff.

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## Challenges and Emerging Issues

Within the framework of this review, the FHWA/FTA/CDOT Review Team highlighted and evaluated several overarching challenges and emerging issues during the planning review process:

1. MPO organizational stability and sustainability
2. Staff and leadership turnover
3. Program and project implementation under limited funding and staffing
4. Moving Ahead for Progress in the 21<sup>st</sup> Century Act (MAP-21) and Reauthorization
5. Performance Management and Asset Management

As a smaller MPO with relatively few staff, PACOG faces a constant challenge to fulfill the variety of staffing and resource needs to complete the planning tasks in its work plan. As early as 2010, budgetary challenges and staffing decisions within the City of Pueblo resulted in significant MPO staff turnover, including its Director. This resulted in the loss of significant institutional knowledge and created a challenge in replacing the MPO staff with City of Pueblo personnel with the experience and skills needed to continue the MPO's planning activities. In addition, most MPO staff since this period have carried job responsibilities for both the City and the MPO. The conflicting demands of both is reflected by a prolonged pattern of delayed or cancelled MPO projects, significant accumulation of unspent CPG funds, and perhaps the more intangible yet important impacts such as decreased public participation and the overall prominence of PACOG as a leader in community progress efforts.

PACOG continues today to struggle with having the staff capacity to fulfill the tasks identified in its work plan. While the availability of excess CPG funds enables the MPO to accomplish many of its key work tasks with consultant support, this is not sustainable financially over the long run, nor does this address the ultimate need to build institutional knowledge and experience in its staff and its organization. Urgency to address staff and organizational sustainability is further heightened since the current MPO Director has indicated his intent to retire in the next two to three years.

***Moving Ahead for Progress in the 21<sup>st</sup> Century Act (MAP-21) and Reauthorization***, coinciding with the emerging emphasis on performance management and asset management, has created areas of concern and challenge, as well as opportunity for PACOG and its planning partners.

MPOs nationwide face the challenge of addressing a host of new MAP-21 requirements in FTA and FHWA programs that highlight a state of good repair, asset management, performance



measures, performance-based planning, accelerated project delivery, and environmental stewardship. Even before MAP-21 was signed into law, the Colorado Department of Transportation (CDOT) committed to measuring and reporting transportation system performance. The CDOT Policy Directive 14 (PD14) was revised to articulate CDOT goals, objectives, measures, and targets in key areas that align with national goals established by MAP-21.

***Performance Management and Asset Management*** presents opportunities as well as challenges for PACOG. PACOG certainly recognizes the economic importance of implementing performance management, including performance measures and performance-based planning, and asset management into the planning process.

Pending MAP-21 rulemaking will require the following:

- Metropolitan and Statewide Transportation Planning
  - Performance-based planning requires MPOs and States to develop transportation plans and TIPs through a performance-driven, outcome-based approach to planning. This approach requires DOTs and MPOs to establish performance targets that address both the surface transportation performance measures set forth in 23 U.S.C 150(c) in coordination with the state and public transportation performance measures in coordination with providers of public transportation to ensure consistency with performance targets related to transit asset management and transit safety as set forth in 49 U.S.C. 5326(c) and 5329(d). The MPO plans must include performance targets that address performance measures and standards and a System Performance Report. The TIP must include a description how implementation of the TIP projects achieve the performance targets.
- Performance Management /Asset Management
  - MAP-21 established national performance goals for Federal-Aid highway programs in the following areas:
    - Safety
    - Infrastructure
    - Congestion reduction
    - System reliability
    - Freight movement and economic vitality
    - Environmental sustainability
    - Reduced project delivery delays



- MAP-21 requires a Transportation Asset Management Plan (TAMP) for pavement and bridges on the National Highway System (NHS). The TAMP prioritizes system needs during the planning and programming process and documents the performance of the assets.

With the implementation of MAP-21 on the horizon, performance based planning and asset management will be an integral part of all PACOG's major planning documents and efforts. Performance measures will have to be connected across all the platforms as to illuminate the story being told by PACOG's efforts and successes. The outcomes will have to be coordinated with CDOT which will feed into a higher level State perspective for transportation accomplishments.

### Successful Practices

The Review Team also wanted to highlight best practices that were identified during this review.

Active participation in regional transportation meeting with City, County, Pueblo West, and CDOT to review the status of projects, transportation issues, future projects, and updates.

PACOG staff efforts on the evaluation and update of the PACOG Travel Demand Model including the input data, calibration, and validation of the new TDM data.

Collaboration with the PACOG agency members to identify and determine priority transportation corridors within the PACOG region and associated projects to be included within the FY2016-2019 TIP and 2040 LRTP.

Collaboration with the PACOG agency members to develop applications for RAMP projects that are currently under construction that incorporate unique local agency partnerships with CDOT.



## Observations, Required Actions, and Recommendations

The review team identified the following topic-based observations and subsequent Required Actions for PACOG to implement. The body of this document provides explanations of the observations, the regulatory basis for the requirement, and associated required actions and recommendations. Appendix I: Required Actions Matrix serves as a quick reference for the required actions by topic area. The Required Actions are mandatory steps PACOG must take to meet Federal and State planning regulations and rules. Recommendations, while not explicit or mandatory, are expected to be addressed by the MPO in the implementation of this review in the creative manner it deems most effective.

### MPO Responsibilities

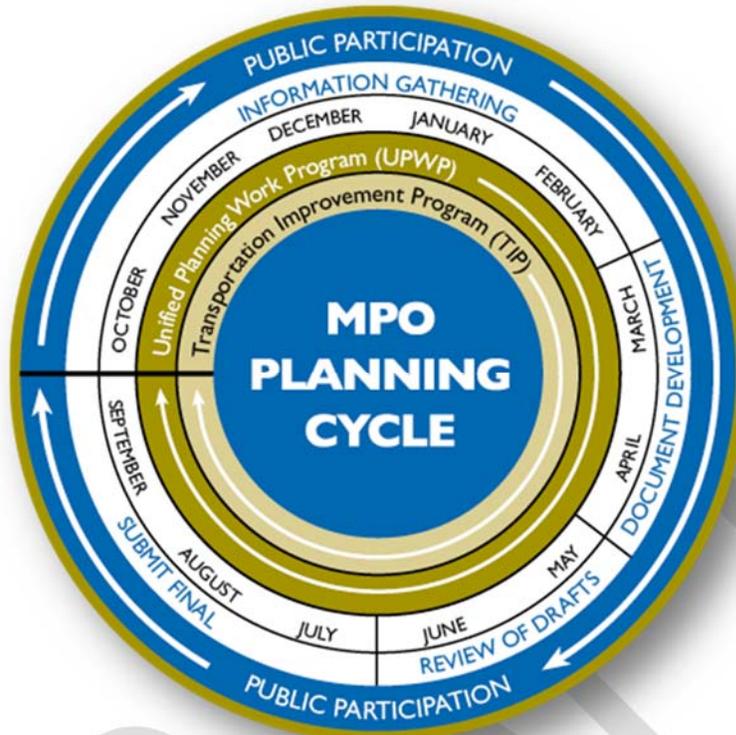
Metropolitan transportation planning provides the information, tools, and public involvement forum needed for continuous measuring, monitoring, and improving of transportation system performance. Transportation planning considers and implements programs, projects and strategies that address national, state and regional goals and objectives.

The MPO designated for each urbanized area (UZA) is charged by federal law and regulation to carry out a continuing, cooperative and comprehensive (3C's), multimodal, metropolitan transportation planning process. The development of a UPWP and the production and maintenance of a LRTP and TIP are the basic federal planning requirements the MPO must meet. The MPO is a representative group of local agencies and others that leads the transportation planning process for the region in cooperation with the State DOT and the transit agency. The MPO is the region's policymaking organization responsible for prioritizing transportation initiatives.

#### Regulatory Basis:

23 CFR 450.314 (a)

- "The MPO, the State(s) and the public transportation operator(s) shall cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process. "



**Observation:** PACOG is charged with the responsibility to satisfy Federal transportation planning regulations to produce a UPWP, LRTP, TIP, and supporting activities that include: travel demand modeling, public involvement planning, and planning studies. The MPO has struggled to produce some of these products on schedule with a robust public process and several planning studies and efforts have been delayed or cancelled according to adopted work plans.

1. **Required Action:** PACOG must ensure it has appropriate and adequate staff and resources to support a robust planning process and produce quality transportation planning deliverables in the future such as TIP, UPWP, LRTP, invoices and reports on time and as specified in the UPWP.

**Current Status:** PACOG has completed the FY2016-FY2019 TIP, FY2016-FY2017 UPWP, and is in the process of completing their 2040 LRTP. PACOG needs to be more diligent in the timely submittal of invoices and reports and in delivering the committed products in its work plan.



2. **Required Action:** PACOG must prepare to meet new MAP-21 Performance Measures and Performance-Based Planning and Programming requirements, and fully address rulemaking requirements, on or before deadlines, that pertain to transportation planning and programming.

**Current Status:** PACOG has developed and approved MAP-21 Performance Measures and is working to include Performance Based Planning and Programming requirements as part of the LRTP. PACOG should continue to work in cooperation with FHWA and CDOT to fully address the rulemaking requirements of MAP-21 on or before established deadlines.

**Observation:** Over time, structured coordination and communication efforts between PACOG and FHWA and CDOT have become less vigorous and less frequent than in past years and less than what is deemed appropriate or effective.

3. **Required Action:** PACOG will conduct regular coordination meetings, as frequently as is necessary or is efficient, between PACOG, CDOT, FHWA, and FTA. In addition to general topics needing discussion, PACOG will use these coordination meetings as a forum for ongoing discussion and monitoring of its implementation efforts resulting from this review.
- **Recommendation:** PACOG is encouraged to utilize these coordination meetings flexibly and creatively as a means to further its planning review implementation efforts. For example, TAC or Council chairs might be included so as to encourage closer coordination of efforts or for educational efforts.

**Current Status:** Coordination meetings are happening more frequently on account of this review and are generally scheduled after the monthly PACOG TAC meeting. Regular scheduled meetings will be conducted between PACOG, CDOT and FHWA to implement and monitor progress on the recommendations and requirements in this report.

**Observation:** STAC is to be comprised of one representative from each Transportation Planning Region (TPR), including the five MPOs in the state. Colorado Revised Statutes 43-1-1104 requires the PACOG chairperson or his/her designee to be the representative for the region on that committee. The STAC Representative serves critical roles in transportation planning to advise CDOT on the needs of the statewide transportation system and also to inform local stakeholders on statewide and regional transportation issues. It is therefore generally expected that STAC Representatives regularly attend monthly STAC meetings at CDOT headquarters. The



STAC Alternates serve to represent his/her TPR or MPO at STAC meetings when the regular Representative is unable to attend.

Representative attendance by PACOG at monthly STAC meetings has been inconsistent in recent years. Most, if not all, meetings are attended by MPO Staff, particularly the MPO Director, and in the early half of 2014, the Pueblo County Transportation Director also attended. Prior to May 22, 2014, when the PACOG Board approved Resolution No. 2014-007, neither of these staff were appointed nor recognized as STAC representatives or Alternates, but attended STAC and represented the Pueblo Area.

4. **Required Action:** The PACOG Council must ensure its representation at STAC meetings be by individuals formally recognized and appointed by the Council as STAC Representative or Alternate. PACOG must keep representation current and promptly notify CDOT in writing of any change in STAC representation.

**Current Status:** The PACOG Board Resolution No. 2014-007 approved on May 22, 2014, re-appointed their STAC Representative along with other PACOG and MPO leadership as Alternates. The MPO Director has continued to attend STAC meetings as an Alternate on a regular basis since.

5. **Required Action:** The PACOG Council must encourage their STAC Representative attend STAC meetings regularly and in person whenever possible to maintain continuity in their role. Other STAC Alternates are also encouraged to attend regularly, but, as a general rule, Alternates should not regularly substitute as the designated Representative.
- **Recommendation:** As a critical regional conduit to participation in Statewide Planning and to keeping Pueblo Area local stakeholders informed and engaged in relevant transportation issues, STAC Representatives and Alternates should be encouraged to report on current topics and issues on a regular basis to PACOG Council, TAC and other stakeholder groups. Furthermore, STAC Representatives and/or Alternates should contribute to MPO public participation objectives and efforts to educate and inform PACOG Council, TAC members, and local stakeholders on transportation planning concepts and issues.

**Observation:** PACOG Council, advisory committees, member agencies, stakeholders and the general public are not always aware of or engaged in the transportation planning process, the policy and issues affecting state and regional transportation, or their roles in the planning process.



- **Recommendation:** PACOG can take a visionary leadership role on regional issues, champion change and improvements based on adopted goals and policies, and work to develop or expand partnerships with other community resources and organizations in pursuing those goals.
- **Recommendation:** PACOG and MPO staff are encouraged to find ways to provide better technical assistance to the MPO Council and TAC. Assistance could include better coordination and communication with its advisory committees, initiating regularly scheduled meetings with the PACOG Council Chair, TAC or subcommittees to discuss draft meeting agendas, planning efforts and/or any major issues pertinent to the MPO, and to proactively discuss and address any member concerns.
- **Recommendation:** The MPO Director and staff should devise a training curriculum for both new and existing PACOG Council and advisory committee members and for member agencies on topics including: the key fiscal and programmatic concepts in transportation planning; the roles and responsibilities of the MPO for regional transportation planning; the process steps necessary to meet planning requirements; the MPO decision making structure and roles and responsibilities of its members; and, how the MPO and its planning products relate to the overall multimodal transportation process. These informative and educational efforts should be extended also to the general public as a means to increase awareness and understanding of issues and regional needs and to empower the general public to be effectively engaged in the planning process.

**Observation:** PACOG, as a small MPO, faces staffing and resource challenges to satisfy both Federal and State transportation planning requirements and to achieve effective planning results for the region.

- **Recommendation:** PACOG should creatively explore and implement means to improve its planning process and extend the capacity of its staff to further progress on its planning objectives. Examples may include the involvement of other community resources like university, non-profits, etc., partnering with other planning organizations or utilizing the vast support available from national advocacy organizations such as AMPO, NARC, etc. Specific strategies or projects such as these should be identified in the UPWP.
- **Recommendation:** The MPO should comprehensively and continually identify and understand its responsibilities as an MPO, to understand best practices in transportation planning and, if it deems them appropriate, consider any changes to its programming or



its administrative or organizational structure that would enable it to better fulfill those responsibilities.

- **Recommendation:** PACOG should investigate how other similar sized MPOs accomplish required transportation planning tasks with limited resources, such as through peer exchange.
- **Recommendation:** Take advantage of FHWA, FTA, and CDOT resources and assistance to assess opportunities to maximize MPO resources and effectiveness.

## MPO Structure

Federal Planning Regulations defines MPO as “the policy board of an organization created and designated to carry out the metropolitan transportation planning process.” The MPO is required to have a decision-making policy board that takes approval actions, sets regional long-term transportation policy, and prioritizes program-specific transportation initiatives for funding. Beyond the federal requirement for a policy board, there is no prescribed structure for an MPO. Most MPOs utilize technical and citizen advisory committees, subcommittees, a director, and staff.

### Regulatory Basis:

23 CFR 450.300	23 CFR 450.310
<ul style="list-style-type: none"> <li>•“(a) Sets forth the national policy that the MPO designated for each urbanized area is to carry out a continuing, cooperative, and comprehensive multimodal transportation planning process.”</li> </ul>	<ul style="list-style-type: none"> <li>•“(a) a metropolitan planning organization (MPO) shall be designated for each urbanized area with a population of more than 50,000 individuals (as determined by the Bureau of the Census)</li> </ul>

**Observation:** The review team is aware the PACOG Council is actively engaged in an assessment of the overall organization (not just its MPO role), including reviewing its functional responsibilities, membership structure and voting policies, to analyze options for organizational restructuring.

- **Recommendation:** It is a healthy exercise to periodically assess the MPO’s roles and responsibilities, voting membership and policies, and effectiveness in fulfilling its mission. Furthermore, the characteristics and transportation needs of the region change and mature over time from the needs of the region when it was initially designated as



an MPO. PACOG should evaluate what changes are needed with respect to its transportation responsibilities to be more effective as an MPO and a Council.

**Observation:** PACOG has been, and continues to be, hosted by the City of Pueblo with additional support from Pueblo County. Recently, some PACOG Council members have expressed frustration and concern that not all member entities' needs and interests are effectively represented by the MPO. As a result, members have suggested looking into other hosting options for the MPO along with examining the concept of the MPO as a stand-alone, independent organization. As part of the analysis, the MPO compiled the contribution each member (City and County) contributes to the organization.

- **Recommendation:** Continue the discussion and analysis of what administrative and organizational structure is most effective (hosted or independent structure) for the enhanced fiscal health of the MPO and its effectiveness as a planning organization. It must be noted that this is not a recommendation by CDOT or USDOT to actually move towards reorganizing or that any particular organizational or administrative arrangement is preferred, but rather that the act of having the collaborative conversation should help the organization clarify and understand its roles, more clearly define its priorities and identify its strategies as a transportation planning entity. Included in the appendix is a link to an FHWA sponsored study that looked at administrative capacity for smaller MPOs.
- **Recommendation:** Work with FHWA, FTA, and CDOT to identify and coordinate with MPOs of similar size, structure and regional complexity to support PACOG in determination of appropriate MPO administrative arrangement.



## MPO Staffing

The overarching role of the MPO director and staff is managing the transportation planning process in the region. In this role, one responsibility of MPO staff is to provide information and technical support to MPO board members and advisory committees. Other staff duties include preparing documents, managing consultants, fostering interagency coordination, and facilitating public input and feedback.

### 23 CFR 450.300

- "(a) Sets forth the national policy that the MPO designated for each urbanized area is to carry out a continuing, cooperative, and comprehensive multimodal transportation planning process."

1

**Observation:** Progress on MPO UPWP tasks is often hindered by MPO staff having competing demands on their time and resources due to other City or County job responsibilities. The MPO Director's responsibilities and time are shared between City and MPO, as are all other MPO staff besides a part-time administrative support position.

6. **Required Action:** City of Pueblo, as the delegated authority for conducting the tasks of the MPO, needs to ensure it fulfills its transportation planning responsibilities and commitments by managing the MPO as a self-directed entity rather than an integrated department within the City.
7. **Required Action:** The MPO Director needs to be able to dedicate adequate time to support MPO activities and to successfully administer the annual work plan, without conflict with other City responsibilities, and to be accountable to devoting the proportion of his or her time committed in the MPO's staffing and work plan.
8. **Required Action:** Develop and maintain an MPO personnel directory showing roles and responsibilities; publish this information along with its staffing plan publicly and provide CDOT a copy of the personnel directory whenever it is changed.

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<sup>1</sup> Also look to specifications of UPWP section and 23 CFR 450.308



- **Recommendation:** To minimize the conflicting demands on staff work priorities between the MPO and City or County duties and to maximize the overall productivity of the MPO, the MPO should seek to maximize the number of fully-dedicated MPO staff it employs to conduct planning work.

**Current Status:** Since the beginning of this review, a new Transportation Planner position that is 100% dedicated to MPO tasks has been filled. In addition, a draft staffing plan, approved by the City Manager, proposes to create a new MPO Program Manager position that is 100% dedicated to MPO activities and would provide overall program and project administration. The MPO Program Manager would be trained to eventually take over as MPO Administrator (Director). Another new Technician position is also proposed. This position would be fully MPO-dedicated and would provide program, data, and administrative support. Draft job descriptions have been prepared for these positions, and these new positions will be proposed for City Council approval prior to the end of December of 2015.

**Observation:** The MPO recently experienced high turnover of long-time staff who were knowledgeable of planning processes and current planning tools of the MPO. The remaining staff at that time did not have the institutional knowledge or skills required to effectively continue the MPO's activities.

9. **Required Action:** PACOG shall develop a staffing and succession plan addressing all MPO staff, but, in particular, the MPO Director and Socio-Economic Planner positions. A staffing plan would identify feasible strategies to lessen institutional knowledge loss as employees leave or retire and entail strategies to train and build the capacity of the current staff.

**Current Status:** The part-time Socio-Economic Planner will not be returning in 2016, which further emphasizes the need for implementing a succession plan. The MPO is developing staffing scenarios to start addressing human capital needs.

- **Recommendation:** Pursue a more flexible labor strategy to address uneven workload needs throughout the UPWP programming period as well as specialized and technical demands during the planning cycle. This strategy may involve use of general service consultants, temporary staff in lieu of hiring permanent employees, partnership with other local entities and/or utilization of student interns.
- **Recommendation:** Pursue developing cooperative relationships with alternative sources of expertise, such as universities and colleges, non-profits, public interest groups, and regional and national organizations.



- **Recommendation:** Pursue implementing a formalized employee training and development program. Document and track this program within the UPWP.

## Agreements and Bylaws

Federal legislation 23 U.S.C. 134 requires the MPO to work in cooperation with the State and public transportation agencies in carrying out a continuing, cooperative, and comprehensive (3C) metropolitan planning process. These agencies determine their respective and mutual roles and responsibilities and procedures governing their cooperative efforts. Federal regulation requires that these relationships be specified in agreements between the MPO and the State and between the MPO and the public transit operators.

While the requirements for agreements among the parties to the metropolitan planning process are clearly stated in the regulations, some metropolitan areas subject to the regulations lack such agreements entirely or have agreements that do not satisfy regulatory requirements in letter or spirit. Executed written agreements helps to ensure that the 3C process is executed as intended and that the 3C process can be readily understood by the participants in the planning process and the public. The following three questions can serve as useful measures of the adequacy of agreements and contracts governing the metropolitan planning process:

- Do agreements specify the responsibilities of the State, the MPO, the public transportation operator, and the designated air-quality agency?
- Do procedures identified in agreements correspond to a genuine 3C process?
- Do the parties to the metropolitan planning process actually adhere to the process identified in the agreements?

### Regulatory Basis:

23 CFR 450.314 (a) (c) (d)

- “(a) The MPO, the State(s), and the public transportation operator (s) shall cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process. These responsibility shall be clearly identified in written agreements among the MPO, the State(s), and the public transportation operator (s) serving the MPA. To the extent possible, a single agreement between all responsible parties should be developed. The written agreement (s) shall include specific provisions for cooperatively developing and sharing information related to the development of financial plans that support the metropolitan transportation plan and metropolitan TIP and development of the annual listing of obligated projects.

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<sup>2</sup> See 450.322 for Metropolitan Transportation Plan, and Sec 450.324 for Metropolitan TIP and project selection Sec. 450.332



**Observation:** A review of the PACOG Bylaws, dated 2011, found an inconsistency and unclear language in terms of the the number of members and voting representation of the PACOG Council. While the known membership of PACOG consists of eight (8) current member entities represented by sixteen (16) voting representatives, the Membership and Governing Body of PACOG specified in Sections A and B, Article III of the Bylaws specifically list only seven (7) members and fifteen (15) voting representatives.

- **Recommendation:** PACOG Bylaws could provide more clarity and avoid unnecessary complexity about current voting membership by listing Salt Creek Sanitation District as a member in Section B rather than as a note added to Section D, which pertains to the method by which new members join PACOG.

**Observation:** PACOG has in place an agreement with CDOT that directs transportation planning efforts in the MPO along with roles and responsibilities. The Transportation Planning and Programming MOA was signed in 2006. There is a PACOG and CDOT MOA for Concurrence on TIP to STIP Amendments, dated 2008. CDOT has since developed a revised procedure for when STIP policy amendments are completed.

10. **Required Action:** Review and revise the Transportation Planning and Programming MOA to address MAP-21, TIP, and STIP development and amendment processes, and other newer requirements.

**Current Status:** CDOT and the MPOs are working together to develop an updated MOA template to be used as the basis for individual MOAs to be executed with the MPOs beginning early calendar year 2016. The MOA on TIP/STIP amendments will be incorporated into the umbrella Planning MOA.

**Observation:** The PACOG Bylaws identify the appointment of a Transportation Technical Committee (TTC) and a Citizens Advisory Committee (CAC) including the makeup of the Committees and the terms of the members. These advisory committees are currently combined into a single Transportation Advisory Committee (TAC). The role of the TAC, TTC and CAC are not described in the Bylaws other than to provide for integrated and comprehensive transportation planning in accordance with federal and state laws and regulations, and regional policies as adopted by PACOG.

11. **Required Action:** During the next fiscal year the PACOG Board shall consider amending its Bylaws to clearly describe and define the roles and responsibilities of the TTC and CAC.



## Contracting and Reporting

Contractual arrangements are financial documents that authorize MPOs to spend Federal funds. The CPG Contract is used to make Federal planning funds available to the MPO, and includes the specific CPG funding amount and the Federal and state rules, guidelines, and procedures to be followed by the MPO and CDOT. The CPG contract contains a scope of work, based on the PACOG UPWP, addressing major MPO activities to be completed with CPG funds. CPG contracts are two-year contracts between PACOG and CDOT.<sup>3</sup>

Regular financial and performance reporting is required on the UPWP by the MPO to CDOT, FHWA, and FTA. Federal regulations specify the details and timeframes for reporting. In its oversight and monitoring capacity, CDOT further stipulates other reporting required by PACOG. CDOT requires PACOG to compile a midyear and year-end UPWP progress report and to meet to discuss progress made on the UPWP planning activities.

23 CFR 450.326	23 CFR 450.328	Supercircular and Colorado Contracting Requirements
<ul style="list-style-type: none"> <li>• This regulation sets forth requirements for the MPO To cooperatively develop a Transportation Improvement Program (TIP) that is consistent with the MTP and also fiscally constrained. The TIP must cover at least a four year horizon and be updated every four years. The TIP must list all the projects in sufficient detail, reflect public involvement and show criteria for project selection.</li> </ul>	<ul style="list-style-type: none"> <li>• "The FHWA and the FTA shall jointly find that each metropolitan TIP is consistent with the metropolitan transportation plan produced by the continuing and comprehensive transportation process carried on cooperatively by the MPO(s), the State(s), and the public transportation operator(s) in accordance with 23 U.S.C. 134 and 49 U.S.C. 5303. This finding shall be based on the self-certification statement submitted by the State and MPO under §450.334, a review of the metropolitan transportation plan by the FHWA and the FTA, and upon other reviews as deemed necessary by the FHWA and the FTA."</li> </ul>	<ul style="list-style-type: none"> <li>• Supercircular 200.343 dictates that project beginning and end dates for individual UPWP activities are required in each upcoming UPWP plan submitted.</li> <li>• Colorado has various contracting requirements that also must be adhered to throughout the transportation planning process, including the requirement that CPG invoices be submitted to CDOT within 30 days of each billing period.</li> </ul>

**Observation:** PACOG frequently experiences difficulty in submitting invoices to CDOT for reimbursement in a timely manner. On a regular basis, invoices are submitted three or more months after the closing of a billing period.

<sup>3</sup> Details can be found in the CDOT Operating Manual for MPO Transportation Planning



12. **Required Action**: PACOG must adhere to CPG contractual obligations to submit invoices on a monthly basis and within 30 days after the close of each month.

**Compliance Issue**: Violates terms of the CPG contract between PACOG and CDOT.

**Observation**: The Federal planning regulations and CDOT contractual requirements each dictate the frequency and deadlines for PACOG reporting on UPWP budget expenditures and status of accomplishing work tasks. PACOG did not submit a year-end performance and expenditure report for FY 2014 until May 2015 but the deadline was December 31, 2014.

13. **Required Action**: PACOG must adhere to CPG contractual obligations and Federal requirements including Super Circular (2 CFR 200) to submit deliverables before deadlines.

**Compliance Issue**: Violates terms of the CPG contract between PACOG and CDOT and Federal Super Circular requirements.

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## Public Involvement

Public involvement is integral to good transportation planning and decision making. The fundamental objective of public involvement programs is to ensure that the concerns and issues of everyone with a stake in transportation decisions are identified and addressed in the development of policies, programs, and projects. An active public involvement effort ensures individuals and their communities are not overlooked or unfairly bearing the burdens of projects while reaping few of the benefits. The Public Involvement (or Participation) Plan (PIP/PPP) is also formalized written document that is made available for the public and others to access and understand how to engage in the MPO's transportation planning process.

### Regulatory Basis:

23 CFR 450.316	23 CFR 450.322	23 CFR 450.324
<ul style="list-style-type: none"> <li>•"(a) The MPO shall develop and use a documented participation plan that defines a process for providing citizens, affected public agencies, representatives of public transportation employees [and users], and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process."</li> </ul>	<ul style="list-style-type: none"> <li>•"(i) The MPO shall provide citizens, affected public agencies, representatives of public transportation employees [and users], and other interested parties with a reasonable opportunity to comment on the transportation plan using the participation plan developed under 450.216(a)."</li> </ul>	<ul style="list-style-type: none"> <li>•"The MPO shall provide all interested parties with a reasonable opportunity to comment on the proposed TIP as required by 450.316(a)."</li> </ul>

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**Observation:** The PACOG website is not kept up-to-date with current information on upcoming meetings, meeting materials, goals and projects of the MPO, or opportunities for the public to engage in transportation planning. One example is the current PACOG Public Participation Plan (2014) is not posted on the website, nor are meeting schedules and materials available.

- Required Action:** The PACOG website must include the most recent version of the PACOG Public Participation Plan and other planning products.
- Required Action:** The PACOG website needs to contain up-to-date information, and PACOG staff needs to be accountable for posting current and timely information to the

<sup>4</sup> Please reference regulation cited under the Title VI, Environmental Justice and LEP portion of the document as they also apply to public involvement requirements. Title VI Civil Rights Act and EO 12898, 23 USC 324, 29 USC 794 and 23 CFR 50.316 (a) (1)(vii)



website on past and upcoming meetings, public events and other useful public information.

**Observation:** The PACOG Public Participation Plan was last updated in 2014. The Public Participation Plan includes a set of strategies, evaluation metrics, and a commitment to update the plan every three years. It is unclear how effective these strategies are or whether they are being implemented as per the PPP. PACOG recently adopted the FY 2016-2019 TIP and is now developing a new 2040 LRTP, so it is reasonable to expect the MPO will evaluate how specific public involvement techniques worked to engage the public and others during these two planning efforts.

16. **Required Action:** PACOG must keep its Public Participation Plan current as well as track and report on the progress and effectiveness of the strategies identified. PACOG shall include a task and resources in the FY 2016-2017 UPWP to review and revise the PACOG Public Participation Plan, including consideration for any renewed or new efforts based on the results of this review. The Public Participation Plan revision must occur during FY 2016.
17. **Required Action:** The public participation process described in the PPP needs to include explicit procedures, strategies, and outcomes for seeking out the “traditionally underserved”, as per 23 CFR 450.316(a) (1) (vii).

## **Unified Planning Work Program (UPWP)**

The UPWP is a required document that shows the planning activities PACOG is charged with leading and developing (i.e., LRTP and TIP) as well as discussion of the planning priorities and challenges facing the Pueblo region. The UPWP can also serve other purposes, including promoting a unified regional approach to transportation planning in order to achieve regional goals and objectives. The UPWP is an informative source for MPO member agencies, elected officials, the public, and other stakeholders about MPO activities planned for the next two-year period.

Development of the UPWP is conducted by PACOG staff and officially adopted by the MPO Council following a recommendation of approval from the CDOT Multimodal Planning Branch, FHWA and FTA based on a determination that the UPWP tasks are eligible for CPG funding. PACOG may not begin a UPWP task without prior Federal approval of the UPWP and a signed CPG contract. If any new tasks are identified by PACOG after UPWP adoption, work on the new task may not begin until a UPWP amendment is approved that includes the task. The PACOG UPWP is on a two-year cycle starting October 1<sup>st</sup>, but is reviewed and approved annually.



CDOT is responsible for reviewing PACOG CPG invoices for reimbursement. In 2014, a higher scrutiny review was completed by CDOT to address concerns about PACOG's use of CPG funds. FHWA staff supports CDOT staff in review of invoices and answering eligibility-related questions associated with billing details.<sup>5</sup>

### Regulatory Basis:

23 CFR 420.111	23 CFR 450.308	SUPERCIRCULAR
<ul style="list-style-type: none"><li>• Under this regulation (b) work program(s) that document planning activities shall include a description of work to be accomplished and cost estimates with each activity.</li></ul>	<ul style="list-style-type: none"><li>• Under this regulation, each MPO in cooperation with the State(s) and public transportation operator(s) shall develop a UPWP that includes discussion of the planning priorities facing the MPA. The UPWP shall identify work proposed for the next one or two year period by major activity and task (including activities that address the planning factors in section 450.306 (a).</li></ul>	<ul style="list-style-type: none"><li>• Supercircular 200.343 dictates that project beginning and end dates for individual UPWP activities are required in each upcoming UPWP plan submitted.</li></ul>

**Observation:** The Super Circular (2 CFR 200, et seq.) became effective December 2014. This revised regulation contains new grant administration requirements, including setting and adhering to project performance period beginning and end dates.

18. **Required Action:** To meet the Super Circular requirements, the PACOG FY 2016-17 UPWP must have project beginning and end dates authorized by CDOT and FHWA for all stand-alone projects.

**Observation:** The expenses of some MPO staff activities during FY2014 were questioned by CDOT as to their eligibility for reimbursement with CPG funds. Specifically at question was the involvement of Pueblo County staff in activities related to the Governor's Compressed Natural Gas Initiative. Almost all MPO staff at the time had shared responsibilities between the City and the MPO. However, inadequate documentation is provided in CPG invoices to properly determine the staff time spent on specific UPWP work tasks being invoiced and the nature of certain work activities or events. Once proper follow up documentation was provided, it was

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<sup>5</sup> A Note: there are UPWP-related recommendations in other parts of the report



determined that some of the staff work time was spent doing activities that were either not allowable or were ineligible for reimbursement.

19. **Required Action:** Proper summary and supporting documentation must be provided in CPG invoices to demonstrate clearly as to which UPWP work task each staff time expense is attributed.

20. **Required Action:** Before any work using CPG funds begins, the activity must be included or amended into the FHWA and CDOT approved PACOG UPWP.

**Compliance Issue:** Activities that are not identified within the approved or amended UPWP should not be initiated, nor should related expenses be submitted as reimbursable.

**Current Status:** CDOT and the MPO Director worked to define what type of expenses are likely ineligible in the invoices for the months that included reimbursement requests for those expenses in question. Those CPG Invoices were removed from the PACOG reimbursement requests. The invoices did not contain sufficient detail to determine reimbursement eligibility. Therefore, the MPO went back through previous months' staff expenses to identify and document what work tasks were completed and the nature of activities and events in question. Reconciled CPG invoices were resubmitted to CDOT to reflect only eligible expenses. FHWA Colorado Division prepared a document to provide direction to PACOG on eligible CPG activities.

**Observation:** The FY2014-2015 and previous UPWPs contain several activities that appear repeatedly in different work elements in the plan. While this may be effective to demonstrate how certain work products or outcomes contribute to multiple goals of the MPO, it does not provide a means to associate work activities and related expenses to specific work elements which is required for the MPO to track the budget and progress on the work products identified. The current UPWP also contains numerous general planning tasks that the MPO may or may not intend to carry out in the current work period.

21. **Required Action:** Develop a new format or organization of the FY 2016-2017 PACOG UPWP that concisely describes the planning activities, the estimated cost for each activity or task, who performs the work, the schedule for completing the work, the resulting products, a summary of the total amounts, and the sources of federal and matching funds budgeted.

22. **Required Action:** The organization of the UPWP must align with PACOG's accounting, record-keeping and invoicing practices to enable the UPWP to serve as a tool to track



and report ongoing progress on work elements, guide the activities of the MPO staff and appropriately allocate the financial resources of the MPO for the two-year period.

**Current Status:** The newly adopted FY2016-2017 UPWP was completely reformatted and simplified, reflecting a more concise plan for work activities. Continuing revisions of the UPWP are expected to further develop this new format, include implementation actions based on this review, show the calendar of work and a refined budgeting for its work products.

**Observation:** At the onset of the 2015 fiscal year, PACOG had a carry-over of unspent CPG funds in excess of \$780,000, while its annual CPG grant is typically \$350,000. The FY2014-15 UPWP is not specific on how the funds will be spent. On occasion, PACOG has suggested tasks to assign CPG funds which are not eligible for that funding type.

23. **Required Action:** The FY 2016-2017 UPWP needs to contain a strategy to spend down the carry-over funds and assign the funding to its current, shorter-term activities and the longer-term work necessary to implement the required actions in this report. While this longer-term plan may span greater than two to three years in order to responsibly utilize and spend down the carry-over of funds, future UPWPs are generally expected to contain a work plan to utilize the entire annual CPG award within the plan period.

FHWA and CDOT are available to assist in identifying eligible tasks for which CPG funds can be applied and to help develop a deliberate and fiscally-responsible strategy for use of CPG funds.

24. **Required Action:** If MAP-21 rule-making is finalized prior to completing the FY 2016-2017 UPWP, the UPWP needs to specifically include task(s) PACOG will complete to address how MAP-21 regulatory requirements will be met in the planning process.

**Observation:** The PACOG FY 2014-2015 UPWP does not demonstrate how tasks specifically address the regional transportation vision, goals, challenges and issues identified in its planning documents.

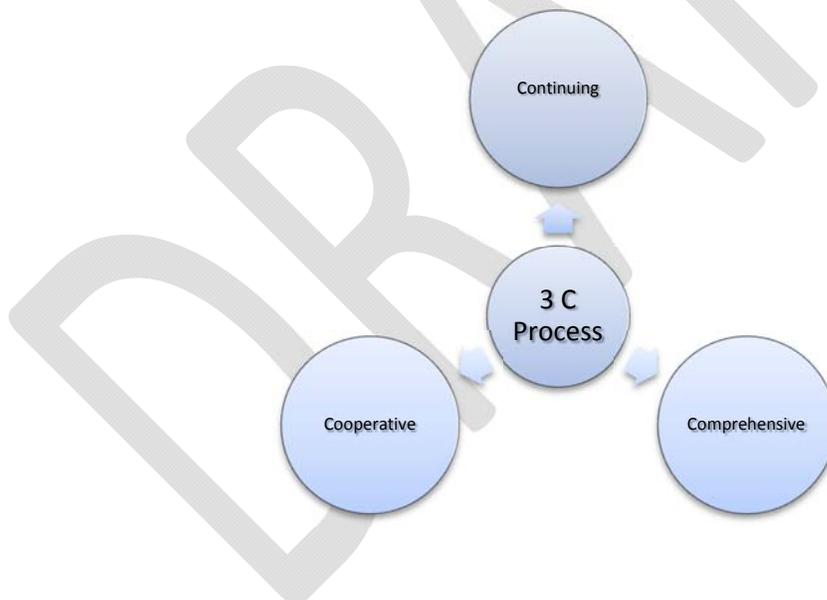
- **Recommendation:** The FY 2016-2017 UPWP should demonstrate the overall strategy for pursuing the established LRTP regional vision and goals, i.e. (2035 RTP Chapter 1) and how the current work activities are furthering progress on those goals. Utilize the FY 2016-2017 UPWP to provide a strategic view of, and direction for, the MPO planning activities with respect to regional priority, challenges and emerging issues.



## Transportation Planning Process

The transportation planning process is a cooperative process. It includes many steps. Throughout the process stakeholders should:

- Monitor existing conditions
- Forecast future population and employment growth, including assessing projected land uses in the region and identifying major growth corridors;
- Identify current and projected future transportation problems and needs and analyze, through detailed planning studies, various transportation improvement strategies to address those needs;
- Develop long-range plans and short-range programs of alternative capital improvement and operational strategies for moving people and goods;
- Estimate the impact of recommended future improvements to the transportation system on environmental features, including air quality; and
- Develop a financial plan for securing sufficient revenues to cover the costs of implementing strategies.





<i>Document</i>	<i>Who Develops?</i>	<i>Who Approves?</i>	<i>Time/Horizon</i>	<i>Contents</i>	<i>Update Requirements</i>
<i>UPWP</i>	MPO	MPO	1 or 2 Years	Planning Studies and Tasks	Annually
<i>MTP/RTP</i>	MPO	MPO	20 Years	Future Goals, Strategies and Projects	Every 5 Years (4 years for non-attainment and maintenance areas)
<i>TIP</i>	MPO	MPO/Governor	4 Years	Transportation Investments	Every 4 Years
<i>LRSTP</i>	State DOT	State DOT	20 Years	Future Goals, Strategies and Projects	Not specified
<i>STIP</i>	State DOT	US DOT	4 Years	Transportation Investments	Every 4 Years

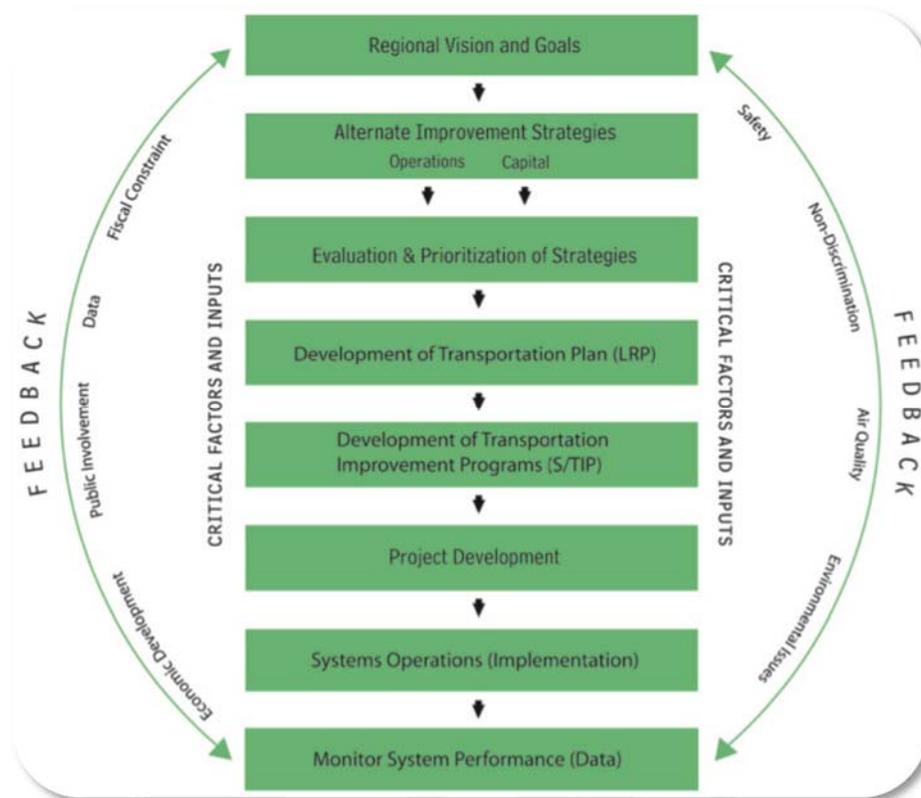
### Regulatory Basis:

#### 23 CFR 450.306

- This Process must:
- Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency
- Increase the safety of the transportation system
- Increase the security of the transportation system
- Increase the accessibility and mobility for people and freight
- Protect and enhance the environment, promote energy conservation, improve quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns
- Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight
- Promote efficient system management and operation
- Emphasize the preservation of the existing transportation system

#### 23 CFR 450.318

- MPO's may undertake a "multimodal, systems-level corridor or subarea planning study as part of the metropolitan transportation planning process.
- The results or decisions of these planning studies may be used as part of the overall project development process consistent with NEPA.



**Observation:** MAP-21 placed increased emphasis on performance management and requires performance-based approaches in metropolitan planning. Performance-based planning and programming (PBPP) is a strategic approach to decision-making that is based on the development, application, and monitoring of performance data to the long-range planning and programming process. Before MAP-21, smaller MPOs with limited staffing and resources were often hesitant to implement such an approach. Now, with MAP-21 rulemaking nearing finalization, MPOs of all sizes are expected to transition toward using a performance-based approach to the planning process, including development of the LRTP and TIP. Appendix III contains links to resources on PBPP and performance management.

25. **Required Action:** PACOG needs to address MAP-21 and CDOT PD14 PBPP performance management requirements in the development of its LRTP and TIP.

- **Recommendation:** Utilize technical assistance from FHWA and CDOT to develop a performance-based approach to the planning process, including a LRTP and TIP that satisfies MAP-21 requirements as they are further clarified.



**Observation:** Federal Planning regulations provide the opportunity for PACOG to propose and submit to FHWA and FTA for approval a procedure for developing an abbreviated LRTP and TIP.

- **Recommendation:** PACOG could consider proposing a simplified planning procedure. Such a procedure must show PACOG is meeting the intent of 23 USC 134 and other applicable Federal requirements including: Title VI of the Civil Rights Act and other nondiscrimination provisions, Environmental Justice, and grant administration rules (Super Circular).

## Long Range Transportation Plan

The long-range transportation plan (LRTP) describes the vision, goals, and policies for the region, as well as the policies, operational strategies, and projects to achieve the vision and goals. The plan is required to cover at least a 20-year planning period and is updated every 4-5 years. It shall include both long-range and short-range strategies and actions that lead to the development of an integrated multimodal transportation system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand. While the plan does not need to demonstrate fiscal constraint, it needs to include a financial plan that demonstrates there is enough funding anticipated to build and operate the proposed projects.

MPOs must develop a 20-year LRTP that supports improved mobility and access for people and goods and supports a good quality of life. The LRTP includes the regional goals and policies, anticipated available funding a list of priority transportation projects that will be implemented during that 20-year period. It must be formally adopted by the MPO and updated at least every 4 years (in Colorado). The LRTP must also be consistent with the state transportation plan.



## Regulatory Basis:

### 23 CFR 450.322

- "(a) The metropolitan transportation planning process shall include the development of a transportation plan addressing no less than a 20-year planning horizon as of the effective date. In nonattainment and maintenance areas, the effective date of the transportation plan shall be the date of a conformity determination issued by the FHWA and the FTA. In attainment areas, the effective date of the transportation plan shall be its date of adoption by the MPO.
- (b) The transportation plan shall include both long-range and short-range strategies/actions that lead to the development of an integrated multimodal transportation system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand..."

6

**Observation:** The current PACOG Amended 2035 LRTP was adopted in 2011. The PACOG 2040 LRTP is currently being prepared. In the ongoing planning review, the following areas will be assessed in the document:

- MAP-21 PBPP and PM requirements
- Planning Factors
- Public review/involvement; development calendar
- Financial planning and fiscal constraint that includes a list of projects completed and underway in FY2012-2017 TIP
- How have Title VI of the Civil Rights Act of 1964 and related requirements been addressed?
- Consultation with State and local agencies responsible for land-use management, natural resources, environmental protection, conservation, and historic preservation, involving comparison of Transportation Plans with State conservation plans or maps or comparison of Transportation Plans with inventories of natural or historic resources.

<sup>6</sup> See 450.322 for Metropolitan Transportation Plan, and Sec 450.324 for Metropolitan TIP and project selection Sec. 450.332



## Transportation Improvement Program

The MPO is required under 23 CFR 450.324 to develop a TIP in cooperation with the State and public transit operators. The TIP is a short-term, fiscally constrained capital programming document that is used to implement the Long Range Plan. It should translate the policies, strategies, and directions of the plan into specific decisions on projects and investments during the short-term TIP time horizon.

### Regulatory Basis:

23 CFR 450.324	23 CFR 450.326	23 CFR 450.330
<ul style="list-style-type: none"> <li>•The TIP shall cover at least a four year period.</li> <li>•It must be updated every four years. If it is updated more frequently it must be compatible with the STIP.</li> <li>•The TIP shall be fiscally constrained.</li> </ul>	<ul style="list-style-type: none"> <li>•Changes that affect fiscal constraint require amendment of the TIP.</li> <li>•Public Involvement is required throughout the Process.</li> <li>•The TIP shall be included without change in the STIP.</li> </ul>	<ul style="list-style-type: none"> <li>•The first year of an approved TIP constitutes an "agreed to" list of projects unless Federal funds available are significantly less than authorized amounts or there is significant shifting of projects between years.</li> <li>• In metropolitan areas not designated as TMA, projects shall be selected by the state and/or the public transportation operator(s), in cooperation with the MPO from the approved metropolitan TIP unless the MPO, State, and public transportation operator jointly develop expedited project selection procedures.</li> </ul>

**Observation:** PACOG adopted the 2016-2019 TIP in May 2015. The TIP does reference MAP-21 requirements.

26. **Required Action:** PACOG needs to appropriately address MAP-21 planning and performance requirements after final rulemaking are done to meet the regulatory requirement.

**Observation:** The FY 2016-2019 TIP does not include information as a management tool for monitoring progress in implementing the LRTP.

Until recently, CDOT adopted a new STIP on a four-year cycle but after each year the number of projects available to implement dwindled. CDOT will now adopt a STIP every year and with this more frequent adoption schedule maintain four full years of projects at all times.



- **Recommendation:** PACOG will need to plan for adopting an updated TIP on a minimum of an annual basis to maintain a four-year program of projects and be on same update cycle as the STIP.
- **Recommendation:** The Financial plan needs to demonstrate fiscal constraint based on known projected sources of revenue between FY2016-2019.

**Observation:** The 2016-2019 TIP provides a section entitled, “Project Prioritization and Selection”. However, the section does not contain information on the prioritization and selection process, provide the criteria for the prioritization and selection of projects, or indicate how the criteria for the prioritization and selection of projects may be used to evaluate the effectiveness of the criteria or process. The FY 2012-2017 TIP did include some of this detail, such as projects completed, delayed, and canceled.

27. **Required Action:** The TIP should be used as a management tool for monitoring progress in implementing the transportation plan. The PACOG TIP should expressly identify the criteria and process for prioritizing implementation of the transportation plan elements, and any changes from the previous TIP.
28. **Required Action:** After the 2040 LRTP is adopted and MAP-21 rule-making finalized, PACOG will need to transition toward MAP-21 performance management implementation with the TIP reporting on the LRTP.

**Observation:** In 2016, CDOT will adopt an updated four-year STIP and repeat yearly rather than doing so on a four-year cycle.

- **Recommendation:** PACOG should consider adopting an updated TIP more frequently than every four years to maintain a four-year program of projects and be on same update cycle as the STIP.



## Annual List of Obligated Projects

The State, MPO, and public transportation operators cooperatively develop a listing of projects for which federal funds under 23 USC or 49 USC Chapter 53 have been obligated in the previous year. This list must be made available within 90 days of the end of the program year and fulfill the necessary public participation criteria. The listing must include all federally funded projects authorized or revised to increase obligations in the preceding program year and at a minimum the following for each project:

- The amount of funds requested in the TIP.
- Federal funding obligated during the preceding year.
- Federal funding remaining and available for subsequent years.
- Sufficient description to identify the phase of the project.
- Identification of the agencies responsible for carrying out the project or phase.

### Regulatory Basis:

#### 23 CFR 450.332

- 23 CFR 450 requires the metropolitan planning organizations, the State and public transportation operators to cooperate in preparing a list of projects for which Federal funds were obligated for spending during the immediate preceding year. The MPO's Annual Listing of projects shall be published or otherwise made available for public review no later than 90 calendar days after the end of the program year. The project listings should align with categories included in the TIP. This includes project name, location, and other descriptive information included in the TIP. The listing also should include the amount of funds programmed in the TIP, the amount of funds obligated in the preceding program year, and the amount of funds remaining and available for use in the subsequent years. The information should be understandable to a broad readership with varying levels of familiarity with transportation planning and programming concepts.

**Observation:** The PACOG "Obligation Reports" webpage contains the annual list of obligated projects (ALOP) titled "FFY [year] Pueblo FHWA Obligation Report." The website provides these reports, in part, for the past six years. In reviewing the reports, FTA programs and projects are not reflected. One year (FFY 2012) includes a cover sheet indicating the list is a PACOG product and not merely a CDOT generated report. It is also unclear whether the MPO prepares the ALOP by December 31<sup>st</sup> each year, which is the regulatory requirement.

29. **Required Action:** Prior to December 31<sup>st</sup> of each year, PACOG is required to make available a list of projects for which *all* Federal funds were obligated, in accordance with the information requirements of 23 CFR 450.332. A dated cover sheet, such as provided in 2012, or report must be included to demonstrate PACOG is meeting the December 31<sup>st</sup> deadline.



30. **Required Action:** PACOG should review the information CDOT provides to the MPO each year for accuracy and completeness of all reportable project types and modes, and provide evidence the MPO agrees with the project list. PACOG will then be able to clearly show it is meeting the regulatory requirements for preparation and dissemination of ALOP. A dated cover sheet or report would demonstrate PACOG is meeting this requirement. It is also recommended that PACOG amend the title of the ALOP “FFY [year] Pueblo FHWA Obligation Report” to more accurately reflect the need to include all Federal funds obligated in the preceding year.

## Travel Demand Model

Travel demand models (TDM) are a key resource in the Transportation Planning Process. The outputs associated with these models are used to allocate estimates of regional population, employment, and land use. The Metropolitan Transportation Planning Regulations provide clear direction in regard to the use of travel demand models.

### Regulatory Basis:

#### 23 CFR 450.322

- 23 CFR 450.322 (e) The MPO, the State(s) and public transportation operator(s) shall validate data utilized in preparing other existing modal plans for providing input to the transportation plan. In updating the transportation plan, the MPO shall base the update on the latest available estimates and assumptions for population, land use, travel, employment, congestion and economic activity. The MPO shall approve transportation plan contents and supporting analyses produced by a transportation plan update.

#### 23 CFR 450.322 (F)

- 23 CFR 450.322(f) The metropolitan transportation plan shall, at a minimum, include (1) The projected transportation demand of persons and goods in the metropolitan planning area over the period of the transportation plan...

**Observation:** PACOG recently concluded a project to develop a new Transportation Demand Model for transportation planning purposes.

31. **Required Action:** Include within the FY 2016-2017 UPWP appropriate resources reflecting intention to maintain and update the travel demand model and support training for staff and member agency users of the model. The UPWP task will then demonstrate PACOG’s commitment to the importance of the travel demand model to the transportation planning process.



- **Recommendation:** It is recommended that the MPO staff develop technical expertise in the travel demand modeling process and the capability to utilize the new model. Staff needs to be versed in the technical capabilities of running the model, managing updates, and how to understand and explain the model outputs and results.

## **Title VI, Environmental Justice and LEP<sup>7</sup>**

Environmental Justice (EJ) is a critical component of the metropolitan planning process. It is important to produce planning documents that meet the social, environmental, economic, and travel needs of the region. Executive Order 12898 was created to bring federal attention to the environmental and human health conditions in low-income and minority communities with the goal of achieving Environmental Justice. The goal of Environmental Justice is to ensure that any adverse human health or environmental effects of any government activities do not disproportionately affect minority or low-income populations. As the primary forum for the cooperative development of regional transportation plans, MPO's need to be in compliance with Title VI and incorporate Environmental Justice concerns. These responsibilities include:

- Identify low-income and minority populations so that their needs can be identified and addressed and that the benefits as well as the burdens of transportation investments can be fairly distributed throughout the planning area.
- Enhance existing analysis processes to ensure that the Long Range Plan and TIP comply with Title VI requirements.
- Evaluate the existing public involvement processes and improve if necessary to include minority and low-income populations in the decision making process.

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<sup>7</sup> Please refer to the Public Involvement Section regulations as well.



**Regulatory Basis:**

**23 CFR 450.316 (a) (1)(vii)**

- This regulation requires that the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households that may face challenges accessing employment and other services, be sought out and considered.

**23 CFR 450.334(a)(3)**

- These regulations require that FHWA and FTA certify that "the planning process is being conducted in accordance with all applicable requirements of the Title VI of the Civil Rights Act of 1964 and the Title VI assurance executed by each state."

**Title VI Civil Rights Act and EO 12898**

- 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 assistance."

**Observation:** For the purposes of the MPO, PACOG uses the City of Pueblo’s Title VI (Civil Rights act) and other nondiscrimination complaint procedures.

32. **Required Action:** PACOG shall adopt its own Title VI (Civil Rights act) and other nondiscrimination complaint procedures, and the procedures should be posted on the PACOG website.

**Observation:** The PACOG 2016-2019 TIP outlines the approach to Environmental Justice at the MPO, whereby CDOT completes the analysis for projects considered and/or included within the TIP. It is unclear how transit projects are analyzed.

33. **Required Action:** During the next update of PACOG’s Public Participation Plan and/or LRTP, clearly explain the Environmental Justice analysis process for the MPO, and how it is utilized in the planning process and in the development of the Title VI Program.

**Observation:** The review team was unable to determine how PACOG specifically ensures that persons with Limited English Proficiency (LEP) are able to meaningfully access transportation services. The PACOG Public Participation Plan only briefly explains the process to identify LEP persons and does not indicate specific methods to encourage participation in the planning process.

34. **Required Action:** During the next update of PACOG’s Public Participation Plan clearly explain the PACOG LEP process, its goals and challenges.



## Conclusion

The transportation planning program review conducted for PACOG demonstrated substantial overall compliance with the intent of Federal and State transportation planning requirements. Transportation planning activities in the Pueblo MPO area are being generally carried out in accordance with governing Federal and State laws, regulations, policies, and procedures. However, the Review Team did identify many areas for improvement, as well as a few minor compliance issues, which would enhance the transportation planning process, institute a more stable and sustainable MPO organization, and advance progress on a transportation vision and set of goals for the Pueblo region. If successfully implemented, these improvements will enhance both the planning process and the mobility and accessibility of the travelling public and goods.

In the near term, PACOG is expected to develop a general plan and timeline to implement these recommendations, some of which have specific dates expected. The ongoing planning coordination with CDOT, FHWA and FTA, which is the responsibility of PACOG and the MPO Staff, should be utilized as a means to gain deeper understanding of the issues, to explore the means to best implement the recommendations and to report on the progress of the implementation plan. The ultimate success of quality transportation planning for the Pueblo Area will rely on all members and stakeholders involved in the MPO to engage in its written vision, goals and strategies and in the implementation of the recommendations in this report.

Therefore, subject only to the full implementation of the Required Actions and reporting the progress of implementing the recommendations cited in this report, the Review Team finds PACOG following a planning process that complies with the federal planning requirements in 23 USC 134 and 49 USC 1607.



## Appendix I: Required Actions & Recommendations Matrix

Topic Area	#	Required Action	Timeline	Responsible Parties					
				PACOG Council	MPO Staff	TAC	City of Pueblo	CDOT	FHWA /FTA
MPO Responsibilities	1	PACOG must ensure it has appropriate and adequate staff and resources to support a robust planning process and produce quality transportation planning deliverables in the future such as TIP, UPWP, LRTP, invoices and reports on time and as specified in the UPWP.		x			x		
	2	PACOG must prepare to meet new MAP-21 Performance Measures and Performance-Based Planning and Programming requirements, and fully address rulemaking requirements, on or before deadlines, that pertain to transportation planning and programming.			x	x		x	x
	3	PACOG will conduct regular coordination meetings, as frequently as is necessary or is efficient, between PACOG, CDOT, FHWA, and FTA.	Ongoing		x			x	x
		<u>Recommendation:</u> PACOG is encouraged to utilize these coordination meetings flexibly and creatively as a means to further its planning review implementation efforts. For example, TAC or Council chairs might be included so as to encourage closer coordination of efforts or for educational efforts.		x	x	x			
	4	The PACOG Council must ensure its representation at STAC meetings be by individuals formally recognized and appointed by the Council as STAC Representative or Alternate. PACOG must keep representation current and promptly notify CDOT in writing of any change in STAC representation.		x					
	5	The PACOG Council must encourage their STAC Representative attend STAC meetings regularly and in person whenever possible to maintain continuity in their role. Other STAC Alternates are also encouraged to attend regularly, but, as a general rule, Alternates should not regularly substitute as the designated Representative.	ASAP	x					
		<u>Recommendation:</u> As a critical regional conduit to participation in Statewide Planning and to keeping Pueblo Area local stakeholders informed and engaged in relevant transportation issues, STAC Representatives and Alternates should be encouraged to report on current topics and issues on a regular basis to PACOG Council, TAC and other stakeholder groups. Furthermore, STAC Representatives and/or Alternates should contribute to MPO public participation objectives and efforts to educate and inform PACOG Council, TAC members, and local stakeholders on transportation planning concepts and issues.		x	x				
		<u>Recommendation:</u> PACOG can take a visionary leadership role on regional issues, champion change and improvements based on adopted goals and policies, and work to develop or expand partnerships with other community resources and organizations in pursuing those goals.		x	x	x			
		<u>Recommendation:</u> The MPO director and staff are encouraged to find ways to provide better technical assistance to the MPO Council and TAC. Assistance could include better coordination and communication with its advisory committees, initiating regularly scheduled meetings with the PACOG Council Chair, TAC or subcommittees to discuss draft meeting agendas, planning efforts and/or any major issues pertinent to the MPO, and to proactively discuss and address any member concerns.			x				
		<u>Recommendation:</u> PACOG and MPO staff should devise a training curriculum for both new and existing PACOG Council and advisory committee members and for member agencies on topics including: the key fiscal and programmatic concepts in transportation planning; the roles and responsibilities of the MPO for regional transportation planning; the process steps necessary to meet planning requirements; the MPO decision making structure and roles and responsibilities of its members; and, how the MPO and its planning products relate to the overall multimodal transportation process. These informative and educational efforts should be extended also to the general public as a means to increase awareness and understanding of issues and regional needs and to empower the general public to be effectively engaged in the planning process.		x	x			x	x
		<u>Recommendation:</u> PACOG should creatively explore and implement means to improve its planning process and extend the capacity of its staff to further progress on its planning objectives. Examples may include the involvement of other community resources like university, non-profits, etc., partnering with other planning organizations or utilizing the vast support available from national advocacy organizations such as AMPO, NARC, etc. Specific strategies or projects such as these should be identified in the UPWP.		x	x				
		<u>Recommendation:</u> The MPO should comprehensively and continually identify and understand its responsibilities as an MPO, to understand best practices in transportation planning and, if it deems them appropriate, consider any changes to its programming or its administrative or organizational structure that would enable it to better fulfill those responsibilities.		x	x				
		<u>Recommendation:</u> PACOG should investigate how other similar sized MPOs accomplish required transportation planning tasks with limited resources, such as through peer exchange.		x	x				
		<u>Recommendation:</u> Take advantage of FHWA, FTA, and CDOT resources and assistance to assess opportunities to maximize MPO resources and effectiveness.			x				

Topic Area	#	Required Action	Timeline	Responsible Parties					
				PACOG Council	MPO Staff	TAC	City of Pueblo	CDOT	FHWA FTA
MPO Structure		<u>Recommendation:</u> It is a healthy exercise to periodically assess the MPO's roles and responsibilities, voting membership and policies, and effectiveness in fulfilling its mission. Furthermore, the characteristics and transportation needs of the region change and mature over time from the needs of the region when it was initially designated as an MPO. PACOG should evaluate what changes are needed with respect to its transportation responsibilities to be more effective as an MPO and a Council.	Ongoing	x	x	x	x		
		<u>Recommendation:</u> Continue the discussion and analysis of what administrative and organizational structure is most effective (hosted or independent structure) for the enhanced fiscal health of the MPO and its effectiveness as a planning organization. It must be noted that this is not a Recommendation by CDOT or USDOT to actually move towards reorganizing or that any particular organizational or administrative arrangement is preferred, but rather that the act of having the collaborative conversation should help the organization clarify and understand its roles, more clearly define its priorities and identify its strategies as a transportation planning entity. Included in the appendix is a link to an FHWA sponsored study that looked at administrative capacity for smaller MPOs.	Ongoing	x	x	x	x		
		<u>Recommendation:</u> Work with FHWA, FTA, and CDOT to identify and coordinate with MPOs of similar size, structure and regional complexity to support PACOG in determination of appropriate MPO administrative arrangement.		x	x			x	x
MPO Staffing	6	City of Pueblo, as the delegated authority for conducting the tasks of the MPO, needs to ensure it fulfills its transportation planning responsibilities and commitments by managing the MPO as a self-directed entity rather than an integrated department within the City.			x		x		
	7	The MPO Director needs to be able to dedicate adequate time to support MPO activities and to successfully administer the annual work plan, without conflict with other City responsibilities, and to be accountable to devoting the proportion of his or her time committed in the MPO's staffing and work plan.		x	x		x		
	8	Develop and maintain an MPO personnel directory showing roles and responsibilities; publish this information along with its staffing plan publicly and provide CDOT a copy of the personnel directory whenever it is changed.			x		x		
		<u>Recommendation:</u> To minimize the conflicting demands on staff work priorities between the MPO and City or County duties and to maximize the overall productivity of the MPO, the MPO should seek to maximize the number of fully-dedicated MPO staff it employs to conduct planning work.		x	x		x		
	9	PACOG shall develop a staffing and succession plan addressing all MPO staff, but, in particular, the MPO Director and Socio-Economic Planner positions. A staffing plan would identify feasible strategies to lessen institutional knowledge loss as employees leave or retire and entail strategies to train and build the capacity of the current staff.	FY2016	x	x				
		<u>Recommendation:</u> Pursue a more flexible labor strategy to address uneven workload needs throughout the UPWP programming period as well as specialized and technical demands during the planning cycle. This strategy may involve use of general service consultants, temporary staff in lieu of hiring permanent employees, partnership with other local entities and/or utilization of student interns.		x	x		x		
		<u>Recommendation:</u> Pursue developing cooperative relationships with alternative sources of expertise, such as universities and colleges, non-profits, public interest groups, and regional and national organizations.		x	x		x		
		<u>Recommendation:</u> Pursue implementing a formalized employee training and development program. Document and track this program within the UPWP.		x	x		x		
Agreements and Bylaws		<u>Recommendation:</u> PACOG Bylaws could provide more clarity and avoid unnecessary complexity about current voting membership by listing Salt Creek Sanitation District as a member in Section B rather than as a note added to Section D, which pertains to the method by which new members join PACOG.	FY2016	x					
	10	Review and revise the Transportation Planning and Programming MOA to address MAP-21, TIP, and STIP development and amendment processes, and other newer requirements.	FY2016	x	x				
	11	During the next fiscal year the PACOG Board shall consider amending its Bylaws to clearly describe and define the roles and responsibilities of the TTC and CAC.	FY2016	x	x	x			

Topic Area	#	Required Action	Timeline	Responsible Parties					
				PACOG Council	MPO Staff	TAC	City of Pueblo	CDOT	FHWA FTA
Contracting and Reporting	12	PACOG must adhere to CPG contractual obligations to submit invoices on a monthly basis and within 30 days after the close of each month.	FY2016	x	x		x		
	13	PACOG must adhere to CPG contractual obligations and Federal requirements including Super Circular (2 CFR 200) to submit deliverables before deadlines.	FY2016		x		x		
Public Involvement	14	The PACOG website must include the most recent version of the PACOG Public Participation Plan and other planning products.	ASAP		x		x		
	15	The PACOG website needs to contain up-to-date information, and PACOG staff needs to be accountable for posting current and timely information to the website on past and upcoming meetings, public events and other useful public information.	ASAP		x		x		
	16	PACOG must keep its Public Participation Plan current as well as track and report on the progress and effectiveness of the strategies identified. PACOG shall include a task and resources in the FY 2016-2017 UPWP to review and revise the PACOG Public Participation Plan, including consideration for any renewed or new efforts based on the results of this review. The Public Participation Plan revision must occur during FY 2016.	FY2016	x	x	x			
	17	The public participation process described in the PPP needs to include explicit procedures, strategies, and outcomes for seeking out the "traditionally underserved", as per 23 CFR 450.316(a) (1) (vii).	FY2016	x	x	x			
Unified Planning Work Program (UPWP)	18	To meet the Super Circular requirements, the PACOG FY 2016-17 UPWP must have project beginning and end dates authorized by CDOT and FHWA for all stand-alone projects.	FY2016		x				
	19	Proper summary and supporting documentation must be provided in CPG invoices to demonstrate clearly as to which UPWP work task each staff time expense is attributed.	Ongoing		x		x		
	20	Before any work using CPG funds begins, the activity must be included or amended into the FHWA and CDOT approved PACOG UPWP.		x	x		x		
	21	Develop a new format or organization of the FY 2016-2017 PACOG UPWP that concisely describes the planning activities, the estimated cost for each activity or task, who performs the work, the schedule for completing the work, the resulting products, a summary of the total amounts, and the sources of federal and matching funds budgeted.	FY2016	x	x	x			
	22	The organization of the UPWP must align with PACOG's accounting, record-keeping and invoicing practices to enable the UPWP to serve as a tool to track and report ongoing progress on work elements, guide the activities of the MPO staff and appropriately allocate the financial resources of the MPO for the two-year period.	FY2016		x		x		
	23	The FY 2016-2017 UPWP needs to contain a strategy to spend down the carry-over funds and assign the funding to its current, shorter-term activities and the longer-term work necessary to implement the required actions in this report.	ASAP	x	x				
	24	If MAP-21 rule-making is finalized prior to completing the FY 2016-2017 UPWP, the UPWP needs to specifically include task(s) PACOG will complete to address how MAP-21 regulatory requirements will be met in the planning process. <u>Recommendation:</u> The FY 2016-2017 UPWP should demonstrate the overall strategy for pursuing the established LRTP regional vision and goals, i.e. (2035 RTP Chapter 1) and how the current work activities are furthering progress on those goals. Utilize the FY 2016-2017 UPWP to provide a strategic view of, and direction for, the MPO planning activities with respect to regional priority, challenges and emerging issues.	Ongoing	x	x	x			
Transportation Planning Process	25	PACOG needs to address MAP-21 and CDOT PD14 PBPP performance management requirements in the development of its LRTP and TIP. <u>Recommendation:</u> Utilize technical assistance from FHWA and CDOT to develop a performance-based approach to the planning process, including a LRTP and TIP that satisfies MAP-21 requirements as they are further clarified.		x	x	x			
		<u>Recommendation:</u> PACOG could consider proposing a simplified planning procedure. Such a procedure must show PACOG is meeting the intent of 23 USC 134 and other applicable Federal requirements including: Title VI of the Civil Rights Act and other nondiscrimination provisions, Environmental Justice, and grant administration rules (Super Circular).			x	x			

Topic Area	#	Required Action	Timeline	Responsible Parties					
				PACOG Council	MPO Staff	TAC	City of Pueblo	CDOT	FHWA FTA
Transportation Implementation Program	26	PACOG needs to appropriately address MAP-21 planning and performance requirements after final rulemaking are done to meet the regulatory requirement.			X	X		X	X
		<u>Recommendation:</u> PACOG will need to plan for adopting an updated TIP on a minimum of an annual basis to maintain a four-year program of projects and be on same update cycle as the STIP.		X	X	X			
		<u>Recommendation:</u> The Financial plan needs to demonstrate fiscal constraint based on known projected sources of revenue between FY2016-2019.		X	X	X			
	27	The TIP should be used as a management tool for monitoring progress in implementing the transportation plan. The PACOG TIP should expressly identify the criteria and process for prioritizing implementation of the transportation plan elements, and any changes from the previous TIP.		X	X	X			
	28	After the 2040 LRTP is adopted and MAP-21 rule-making finalized, PACOG will need to transition toward MAP-21 performance management implementation with the TIP reporting on the LRTP.	FY2016	X	X	X			
		<u>Recommendation:</u> PACOG should consider adopting an updated TIP more frequently than every four years to maintain a four-year program of projects and be on same update cycle as the STIP.	FY2016	X	X	X			
Annual List of Obligated Projects	29	Prior to December 31st of each year, PACOG is required to make available a list of projects for which all Federal funds were obligated, in accordance with the information requirements of 23 CFR 450.332. A dated cover sheet, such as provided in 2012, or report must be included to demonstrate PACOG is meeting the December 31st deadline.	ASAP		X	X	X		
	30	PACOG should review the information CDOT provides to the MPO each year for accuracy and completeness of all reportable project types and modes, and provide evidence the MPO agrees with the project list. PACOG will then be able to clearly show it is meeting the regulatory requirements for preparation and dissemination of ALOP. A dated cover sheet or report would demonstrate PACOG is meeting this requirement. It is also recommended that PACOG amend the title of the ALOP "FFY [year] Pueblo FHWA Obligation Report" to more accurately reflect the need to include all Federal funds obligated in the preceding year.	ASAP		X	X			
Travel Demand Model	31	Include within the FY 2016-2017 UPWP appropriate resources reflecting intention to maintain and update the travel demand model and support training for staff and member agency users of the model. The UPWP task will then demonstrate PACOG's commitment to the importance of the travel demand model to the transportation planning process.	FY2016	X	X				
		<u>Recommendation:</u> It is recommended that the MPO staff develop technical expertise in the travel demand modeling process and the capability to utilize the new model. Staff needs to be versed in the technical capabilities of running the model, managing updates, and how to understand and explain the model outputs and results.	FY2016	X	X				
Title VI, Environmental Justice and LEP	32	PACOG shall adopt its own Title VI (Civil Rights act) and other nondiscrimination complaint procedures, and the procedures should be posted on the PACOG website.	FY2016	X	X	X			
	33	During the next update of PACOG's Public Participation Plan and/or LRTP, clearly explain the Environmental Justice analysis process for the MPO, and how it is utilized in the planning process and in the development of the Title VI Program.	FY2016	X	X	X			
	34	During the next update of PACOG's Public Participation Plan clearly explain the PACOG LEP process, its goals and challenges.	FY2016	X	X	X			



## Appendix II: PACOG Delegation Agreement

ORDINANCE NO. 88-3

AN ORDINANCE APPROVING THE 2015 DELEGATION AGREEMENT BETWEEN THE CITY OF PUEBLO, A MUNICIPAL CORPORATION, AND THE PUEBLO AREA COUNCIL OF GOVERNMENTS FOR TRANSPORTATION PLANNING SERVICES, AND AUTHORIZING THE PRESIDENT OF CITY COUNCIL TO EXECUTE SAME

BE IT ORDAINED BY THE CITY COUNCIL OF PUEBLO, that:

SECTION 1.

The Agreement for Transportation Planning Services effective January 1, 2015, between the Pueblo Area Council of Governments (PACOG) and the City of Pueblo, a Municipal Corporation, to provide transportation and planning services, a copy of which is attached and incorporated, having been approved as to form by the City Attorney, is hereby approved.

SECTION 2.

The President of the City Council is hereby authorized to execute said Agreement on behalf of the City of Pueblo, a Municipal Corporation, and the City Clerk shall affix the seal of the City thereto and attest to the same.

SECTION 3.

The officers and staff of the City are directed and authorized to perform any and all acts consistent with the intent of this Ordinance and the attached Contract to effectuate the transactions described there.

SECTION 4.

This Ordinance shall become effective upon final passage and approval.

INTRODUCED: December 8, 2014

BY: Chris Nicoll  
COUNCILPERSON

APPROVED: [Signature]  
PRESIDENT OF CITY COUNCIL

ATTESTED BY: [Signature]  
CITY CLERK

PASSED AND APPROVED: December 22, 2014





**AGREEMENT FOR TRANSPORTATION PLANNING  
AND IMPROVEMENT SERVICES FOR 2015**

THIS AGREEMENT ("Agreement") is made and entered into effective the 1st day of January, 2015, by and between the Pueblo Area Council of Governments, hereinafter referred to as "PACOG", the City of Pueblo, a Municipal Corporation, hereinafter referred to as "CITY".

WITNESSETH THAT:

WHEREAS, PACOG serves as the Metropolitan Planning Organization (MPO) for the Pueblo Urban Area, and the Transportation Planning Region (TPR) for all of Pueblo County,

WHEREAS, PACOG is eligible to receive funds to perform the work tasks for these activities and has entered into one or more agreements with the State of Colorado and/or the U.S. Department of Transportation for transportation planning and improvement projects whereby funding may be made available to PACOG under provisions of said agreements, and statutes, laws and regulations referenced in said agreements; and

WHEREAS, CITY has the authority, capacity, and ability to undertake such transportation planning and improvement projects; and

WHEREAS, PACOG desires to contract with CITY to provide services, activities, and project execution required of PACOG under the aforesaid agreements through the City of Pueblo Urban Transportation Planning Division (UTPD), and others;

NOW, THEREFORE, in consideration of the foregoing recitals and the terms and conditions set forth herein, the parties hereto do mutually agree as follows:

**1. WORK TASKS; RESPONSIBILITIES OF CITY**

(a) CITY agrees to satisfactorily perform and complete, using its own employees, employees of Pueblo County (herein after referred to as "COUNTY" or such consultants or contractors selected by PACOG in accordance with the regulations and policies of the Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA), the planning services and items of work, and furnish all labor and materials encompassed within or reasonably necessary to accomplish the tasks and functions described in the FY 2014-15 Unified Planning Work Program adopted by PACOG Resolution 2014-010 on August 28, 2014, incorporated herein by reference, in full compliance with all provisions of this Agreement.

(b) CITY is authorized to have pre-approved staff from COUNTY work mutually with CITY staff, and consultants to complete work for services, activities, and project execution required of PACOG as identified in the Scope of Work included as Appendix A attached hereto and incorporated herein by this reference.

(c) City represents that it: (i) has the requisite authority and capacity to perform the services and work contemplated in the FY 2014-15 UPWP and; (ii) that it is a home rule city and political subdivision of the State of Colorado; (iii) that it is fully aware of and



understand its duty to perform all functions and services in accordance with the regulatory requirements set forth in 23 CFR Parts 420 and 450 and 49 CFR Part 18 and those identified in the Memorandum of Agreement (MOA) adopted by PACOG Resolution on September 28, 2006 and incorporated herein by reference, in full compliance with all the provisions of this Agreement.

## 2. RESPONSIBILITIES OF PACOG

PACOG shall designate a representative who will be authorized to make all necessary decisions required of PACOG on behalf of PACOG in connection with the performance of this Agreement and the disbursement of funds in connection with the program. In the absence of such a designation, the City Manager and the Pueblo County Attorney, acting jointly, shall be deemed as PACOG's authorized representative.

## 3. CITY'S COMPENSATION AND METHOD OF PAYMENT

(a) PACOG will pay to CITY, an amount up to that specified in subparagraph (c) of this paragraph as full compensation for all services and work to be performed or undertaken by CITY under this Agreement which is within the FY 2014-15 UPWP. Payment of funds to CITY are subject to the following requirements, which shall be conditions precedent to payment: (i) that CITY staff time has been expended for eligible activities or CITY has obligated or expended funds for eligible approved expenditures, (ii) that CITY is not in default of any material provisions of this Agreement nor applicable law or regulation, (iii) that CITY has submitted requests for payment or reimbursement detailing the eligible payment or reimbursement items, (iv) that, if required by the terms or conditions of an applicable financial assistance agreement, CITY has certified with each payment or reimbursement request compliance with the requirements identified in the MOA and that all staff time and obligations or expenditures for which payment is sought were made for and in furtherance of an approved project or work and are an eligible use of assistance under the law and regulations applicable to such assistance, and (v) that PACOG has timely received from CDOT and local agency matches sufficient funds to make the payment or reimbursement hereunder.

(b) Payment hereunder is also subject to and may only be disbursed in accordance with applicable regulations including but not limited to those contained in the MOA and those set forth in 49 CFR Part 18, as presently promulgated and as same may be revised from time to time in the future, all other terms of this Agreement, and any special provisions in the FY 2014-15 UPWP.

(c) Expenses for pre-approved COUNTY staff time and other eligible reimbursable expenses shall be paid to the COUNTY following the submittal and approval of invoices detailing the eligible reimbursement items.

(d) PACOG shall pay to CITY for services covered by the FY 2014-15 UPWP a sum not to exceed the amounts identified in the FY 2014 PACOG budget (\$874,931) and/or rates set forth in those documents as incorporated herein by reference and as may be amended in writing, in full compliance with all the provisions of this Agreement.

(e) In the event PACOG requests or authorizes work beyond or in addition to that set forth in the FY 2014-15 UPWP, PACOG shall pay additional compensation to the



CITY. The amount of such additional compensation shall be negotiated, but in the event the parties fail to negotiate or are unable to agree regarding compensation, CITY shall be compensated for staff time and its costs at the rates set forth in paragraph (c), above, and for the work of subcontractors and consultants in an amount equal to the reasonable actual cost to CITY.

4. TERM OF AGREEMENT.

The term of this Agreement shall be from January 1, 2015 to December 31, 2015 unless sooner terminated as herein provided.

5. TERMINATION OF AGREEMENT.

(a) For Cause. This Agreement may be terminated by PACOG for cause, including any nonperformance by CITY, upon thirty (30) days written notice to CITY including a statement of the reasons therefore, and after an opportunity for a hearing has been afforded. If a hearing is requested, it shall be held before the PACOG's governing body at a regular or special meeting of same whose decision shall be final. The determination of the PACOG as to the cause of termination and the appropriateness thereof shall be final and binding upon both PACOG and the CITY. Cause for termination shall mean any material failure by CITY to comply with any term of this Agreement.

(b) For Convenience. This Agreement may be terminated for convenience in accordance with the provisions of 49 CFR 18.44. This Agreement shall automatically terminate at the end of its term as well as in the event of any suspension, reduction, or non-receipt of the financial assistance or State or Federal grant funds by PACOG.

(c) Post Termination Procedures. In the event of termination, CITY shall cease further work and CITY shall be entitled to receive just and equitable compensation for satisfactory work performed through the date of termination for which compensation has not previously been paid nor reimbursement made.

6. ASSIGNABILITY.

This Agreement shall not be assigned or transferred by either party without the prior written consent of the other party. Any assignment or attempted assignment made in violation of this provision shall, at the non-assigning party's election, be deemed void and of no effect whatsoever.

7. CONFLICT OF INTEREST.

CITY certifies that neither it nor any members of its City Council, officers or employees has or will derive any personal or financial interest or benefit from the activity or activities assisted pursuant to this Agreement, nor has an interest in any contract, subcontract or agreement with respect thereto, nor the proceeds thereunder, either for themselves or for those with whom they have family or business ties, during their tenure and for one year thereafter. CITY shall avoid all conflicts of interest which are prohibited by applicable federal regulations, if any, including but not limited to those set forth in 49 CFR 18/36(b)(3) as presently promulgated and as same may be revised from time to time in the future.



8. CITY RECORDS.

CITY shall maintain records as to services provided, reimbursable expenses incurred in performing the Work Tasks, and complete accounting records. Accounting records shall be kept on a generally recognized accounting basis and as requested by the PACOG's auditor and acceptable to CDOT and FHWA. CITY agrees to comply with all applicable uniform administrative requirements described or referenced in applicable state or federal regulations, including those set forth in the MOA as a part of this Agreement. PACOG, CDOT, the Comptroller General of the United States, the Inspector General of the U.S. Department of Transportation, and any of their authorized representatives, shall have the right to inspect and copy, during reasonable business hours, all books, documents, papers, electronic media, and records of CITY which relate to this Agreement for the purpose of making an audit or examination. Upon completion of the work and end of the term of this Agreement, the PACOG may require that a copy of all of CITY's financial records relating to this Agreement to be turned over to PACOG.

9. MONITORING AND EVALUATION.

PACOG shall have the right to monitor and evaluate the progress and performance of CITY to assure that the terms of this Agreement are being satisfactorily fulfilled in accordance with CDOT's, FHWA's, FTA's, PACOG's and other applicable monitoring and evaluation criteria and standards. PACOG may quarterly review CITY performance using on-site visits, progress reports required to be submitted by CITY, audit findings, disbursement transactions and contact with CITY as necessary. If requested, the CITY shall furnish to the PACOG periodic but not less frequently than quarterly program and financial reports of its activities in such form and manner as may be requested by the PACOG. CITY shall fully cooperate with PACOG relating to such monitoring and evaluation.

10. CITY FILES AND INFORMATION REPORTS.

CITY shall maintain files, including electronic media, containing information which shall clearly document all activities performed in conjunction with this Agreement, including, but not limited to, financial transactions, conformance with assurances, activity reports, and program income, if any. These records shall be retained by CITY for a period of three years after the completion of the Work Tasks.

11. INDEPENDENCE OF CITY.

Nothing herein contained nor the relationship of CITY to PACOG, which relationship is expressly declared to be that of an independent contractor, shall make or be construed to make CITY or any of CITY's agents or employees the agents or employees of the PACOG. CITY shall be solely and entirely responsible for its acts and the acts of its agents, employees and subcontractors.

12. LIABILITY; INSURANCE.

As to PACOG, CITY agrees to assume the risk of all personal injury, including death and bodily injury, and damage to and destruction of property, including the loss of use therefrom, caused by or sustained, in whole or in part, in conjunction with or arising out of the performance or nonperformance of this Agreement by CITY or by the conditions created



thereby; provided, however, that nothing in this paragraph is intended, nor should it be construed, to create or extend any right, claims or benefits or assume any liability for or on behalf of any third party, or to waive any immunities or limitations otherwise conferred under or by virtue of federal or state law, including but not limited to the Colorado Governmental Immunity Act, C.R.S. 24-10-101, et. seq. CITY shall provide and maintain Workers' Compensation insurance coverage or self-insurance on its employees complying with the requirements of State law.

**13. SPECIAL REQUIREMENTS APPLICABLE TO IMPROVEMENTS TO PROPERTY.**

(a) In addition to all procurement requirements otherwise applicable to CITY pursuant to any other provision of this Agreement or pursuant to any Requirement of law or regulation incorporated in this Agreement by reference, if any portion of the funds provided to CITY under this Agreement are to be used for making improvements to real property, including new construction, rehabilitation, or remodeling, then in such event CITY shall comply with all requirements of this Paragraph 13.

(b) No improvements shall be undertaken to real property with funds (or reimbursement) provided hereunder unless and until: (i) plans and specifications therefore have been prepared by either a registered Professional Engineer in good standing and duly licensed to practice in the State of Colorado or an Architect duly licensed and authorized to conduct a practice of architecture in the State of Colorado; and (ii) all construction contracts for improvements for which payment is sought from PACOG shall have been awarded only after an open, competitive bidding process which allows qualified contractors to reasonably participate.

(c) If this Paragraph 13 is applicable, no disbursement of funds to CITY shall be made by PACOG hereunder unless and until all conditions precedent to payment specified elsewhere in this Agreement have been satisfied and CITY files with PACOG's designated representative a written request for payment signed by an architect, engineer, or an officer of CITY that certifies (i) that the amounts included in the request for payment have not been included in any prior request for payment, and (ii) that the improvements listed therein for which payment is sought have been completed in accordance with the approved plans and specifications therefor.

(d) In every contract for construction of improvements for which payment or reimbursement from PACOG is to be provided under this Agreement, CITY shall include a contract clause or clauses, requiring the contractor, and all of the contractor's subcontracts of all tiers, to comply with the applicable requirements of the Davis-Bacon Act and implementing regulations, and to pay all laborers and mechanics engaged in work upon the improvements at the prevailing wage rates for such work as determined by the U.S. Department of Labor.

**14. EQUAL EMPLOYMENT OPPORTUNITY.**

In connection with the performance of this Agreement, CITY shall comply with the provisions of Title VI of the Civil Rights Act of 1964 and the Title VI assurance executed by PACOG and the State of Colorado under 23 U.S.C. 324 and 29 U.S.C. 794 and the provisions of the Americans with Disabilities Act of 1990 (Pub. L. 101-336, 104 Stat. 327, as amended)



and the U.S. DOT implementing regulations (49 CFR 27.37, and 38) as certified in the FY 2014-15 UPWP (p. ii, therein).

15. ENTIRE AGREEMENT; AMENDMENTS.

The provisions set forth in this Agreement, and all documents as incorporated herein by reference, in full compliance with all the provisions of this Agreement, constitute the entire and complete agreement of the parties hereto and supersede all prior written and oral agreements, understandings or representations related thereto. No amendment or modification of this Agreement, and no waiver of any provision of this Agreement, shall be binding unless made in writing and executed by the duly authorized officers of CITY and PACOG.

16. SIGNATURES.

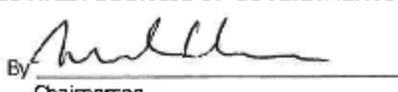
The persons signing this Agreement on behalf of each party represent and warrant that such persons and their respective party have the requisite power and authority to enter into, execute and deliver this Agreement and this Agreement is a valid and legally binding obligation of such party enforceable against it in accordance with its terms.

IN WITNESS WHEREOF, CITY and PACOG have executed this Agreement effective as of the date first above written and under the laws of the State of Colorado.

ATTEST:

PUEBLO AREA COUNCIL OF GOVERNMENTS

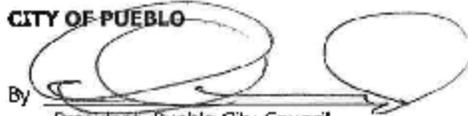
  
Secretary

By   
Chairperson

ATTEST:

CITY OF PUEBLO

  
City Clerk

By   
President, Pueblo City Council



## APPENDIX A

### SCOPE OF WORK

CITY is authorized to pre-approved staff from COUNTY to work mutually with CITY staff, and consultants to complete work for transportation planning services, activities, and project execution required of PACOG for planning services and items of work including all labor and materials encompassed within or reasonably necessary to accomplish the assigned tasks and functions described in the FY 2014-15 Unified Planning Work Program adopted by PACOG Resolution 2014-010 on August 28, 2014.

### PROFESSIONAL FEE SCHEDULE

CITY shall compensate the COUNTY for the Scope of Services, approved by CITY, in accordance with paragraph 3.C. above, in the following manner:

1. An hourly fee comprised of the employee's hourly rate and benefits, excluding administrative and overhead charges, for the completion of approved work documented and approved from invoices submitted by COUNTY.
2. Reimbursement of qualifying additional expenses authorized for the satisfactory performance and completion, of the planning services and items of work in accordance with the regulations and policies of the Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA), encompassed within or reasonably necessary to accomplish the tasks and functions described in the amended FY 2014-15 UPWP adopted by PACOG Resolution 2013-017 on August 22, 2013.
3. The Scope of Work for COUNTY staff that is subject to approval by CITY shall be specifically for eligible transportation planning activities that include work tasks the following tasks identified in the FY 2014-15 UPWP:
  - i) Initiate discussions with MPO stakeholders regarding the creation of a Pueblo Regional Transportation Authority (RTA) or other dedicated funding sources for transportation.
  - ii) Integrating transit, bicycle and pedestrian planning into all transportation planning efforts.
  - iii) Review proposed major county subdivision proposals, zoning changes, site plans, planned developments and land use issues for impacts to the transportation system and require amendment of the PACOG Long Range Transportation Plan.
  - iv) Assist PACOG members by providing information and other assistance with transportation funding grant applications.



- v) Participate in professional training and conferences via teleconferencing, e-mail discussion lists, and webinars.
- vi) Attend FHWA/FTA training programs and other transportation conferences for technical or professional training.
- vii) Meet with FHWA and CDOT monthly for MPO updates and discussion.
- viii) Assist in providing accurate and current information for the PACOG MPO/TPR website.
- ix) Prepare demographic data as needed for transportation modeling used for special studies and/or project consultants.
- x) Analyze and document current and updated traffic count data for the Pueblo area.
- xi) Analyze and document current and updated collision data for trends and recommended solutions to reduce crash rates.
- xii) Review transit system expansion and route service in planning projects and sub-area studies.
- xiii) Obtain, update, convert, refine, and maintain surface roadway systems data for the Pueblo area. This includes national highway system, state highway system, county and local roadways.
- xiv) Obtain, update, convert, refine, and maintain transit systems data for the Pueblo area. This includes updating of route and stop location changes.
- xv) Utilize the PACOG Travel Demand Model program to run scenarios involving roadway improvements and construction on new transportation routes to evaluate costs and benefits.
- xvi) Assist in conducting, and participating in sub-area and special studies related to the Joe Martinez/West Pueblo connector corridor and the analysis of the transit operations/improvements in the Pueblo region including the procurement of consultants to work on the plans and studies.



## Appendix III: Resources

PACOG By-Laws (Adopted March 24, 2011)

[http://www.pacog.net/sites/default/files/pacog/documents/pacog\\_bylaws.pdf](http://www.pacog.net/sites/default/files/pacog/documents/pacog_bylaws.pdf)

General Accountability Office September 2009 Report to Congress *Metropolitan Planning Organizations: Options Exist to Enhance Transportation Planning Capacity and Federal Oversight*

<http://www.gao.gov/assets/300/294812.pdf>

Transportation Research Board Conference Proceedings 39 2006 *the Metropolitan Planning Organization, Present and Future*

<http://www.trb.org/Main/Blurbs/159366.aspx>

Federal Highway Administration May 2010 *Staffing and Administrative Capacity of Metropolitan Planning Organizations*

[http://www.planning.dot.gov/documents/Staffing\\_Administrative\\_Capacity\\_MPOs.pdf](http://www.planning.dot.gov/documents/Staffing_Administrative_Capacity_MPOs.pdf)

Congressional Research Service February 2010 *Metropolitan Transportation Planning*

<https://fas.org/sgp/crs/misc/R41068.pdf>

Federal Highway Administration December 2014 *Performance-Based Planning for Small Metropolitan Areas*

[http://www.fhwa.dot.gov/planning/performance\\_based\\_planning/small\\_mpo\\_report/](http://www.fhwa.dot.gov/planning/performance_based_planning/small_mpo_report/)

Federal Highway Administration September 2013 *Performance Based Planning and Programming Guidebook*

[http://www.fhwa.dot.gov/planning/performance\\_based\\_planning/pbpp\\_guidebook/](http://www.fhwa.dot.gov/planning/performance_based_planning/pbpp_guidebook/)

Federal Highway Administration August 2014 *Model Long-Range Transportation plans: A Guide for Incorporating Performance-Based Planning*

[http://www.fhwa.dot.gov/planning/performance\\_based\\_planning/mlrtp\\_guidebook/](http://www.fhwa.dot.gov/planning/performance_based_planning/mlrtp_guidebook/)

Colorado Department of Transportation April 2012 *CDOT Operating Manual for MPO Transportation Planning*

<https://www.codot.gov/programs/statewide-planning/cdot-operating-manual-for-mpo-transportation.html>



## Appendix IV: Acronyms

3C Process	Continuing, Cooperative and Comprehensive Transportation Planning Process
ADA	Americans with Disabilities Act
ALOP	Annual List of Obligated Projects
AQ	Air Quality
CAAA	Clean Air Act Amendments of 1990
CAC	Citizens' Advisory Committee
CDOT	Colorado Department of Transportation
CFR	Code of Federal Regulations
CMAQ	Congestion Mitigation and Air Quality
CPG	Consolidated Planning Grant
DA	Division Administrator
DBE	Disadvantaged Business Enterprises
DTD	CDOT Division of Transportation Development
EJ	Environmental Justice
EPA	Environmental Protection Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GIS	Geographic Information System
ITS	Intelligent Transportation Systems
LEP	Limited English Proficiency
L RTP	Long Range Transportation Plan
M&O	Maintenance & Operations
MAP-21	Moving Ahead for Progress in the 21 <sup>st</sup> Century Act
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
MPA	Metropolitan Planning Area (boundary)
MPO	Metropolitan Planning Organization
MTP	Metropolitan Transportation Plan
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHI	National Highway Institute
NHS	National Highway System
NTI	National Transit Institute
PEA	Planning Emphasis Area
PL	Metropolitan Planning Funds
PPP	Public Participation Plan
RTP	Regional Transportation Plan
SIP	State Implementation Plan
STAC	Statewide Transportation Advisory Committee
STIP	State Transportation Improvement Program
TAC	Transportation Advisory Committee
TC	Colorado Transportation Commission
TIP	Transportation Improvement Program
Title VI	Title VI of the 1964 Civil Rights Act
TPCB	Transportation Planning Capacity Building program
TTC	Transportation Technical Committee
U.S.C.	United States Code
UPWP	Unified Planning Work Program
UZA	Urbanized Area
VMT	Vehicle Miles of Travel



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

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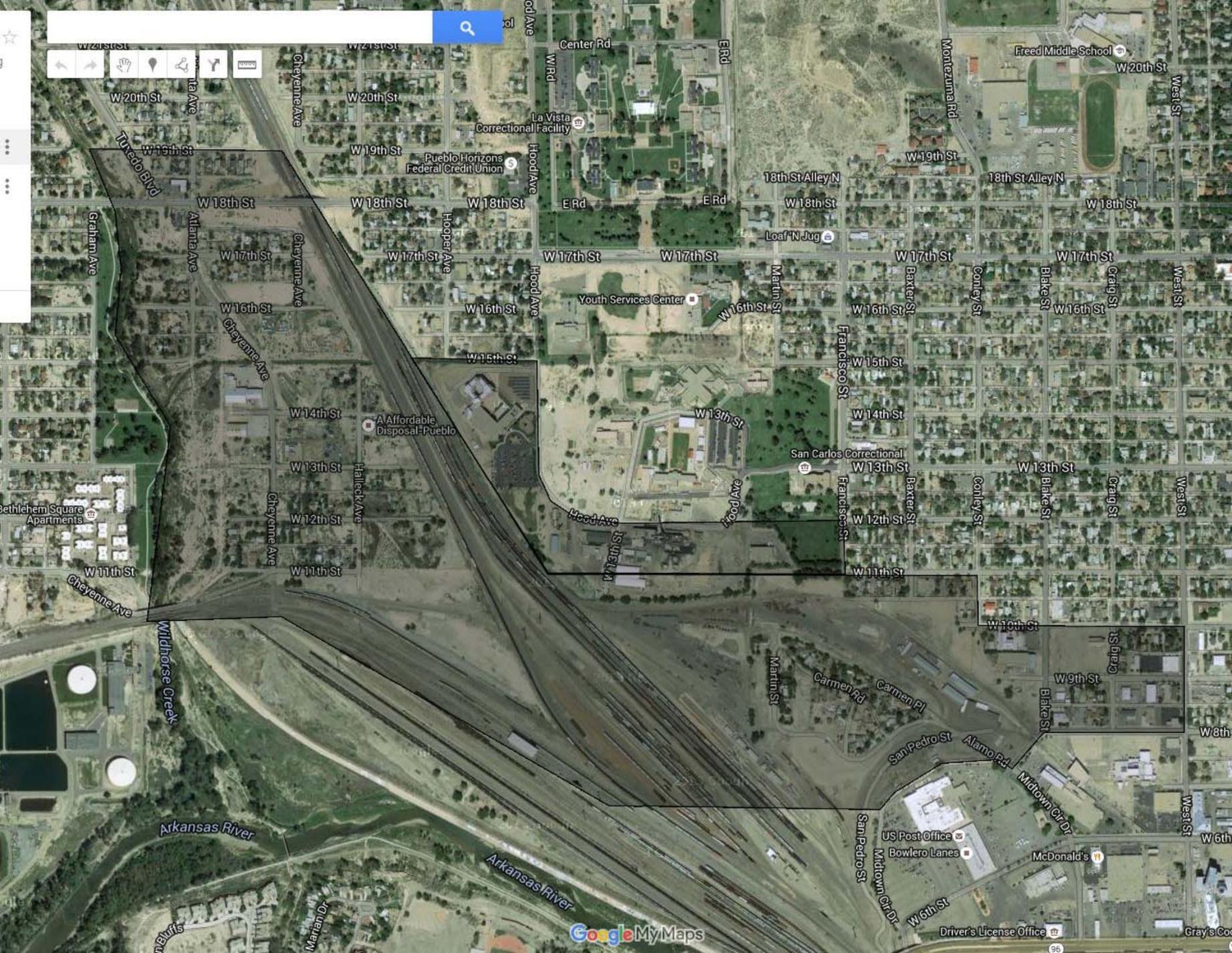
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Division of Transportation Development



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