York
Transportation Management Area

Final Report
October 30, 2019
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1.0 EXECUTIVE SUMMARY

On June 25-26, 2019, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted a joint Certification Review of the transportation planning process for the York urbanized area. FHWA and FTA are required to jointly review and evaluate the transportation planning process for each urbanized area over 200,000 in population at least every four years to determine if the process meets the Federal planning requirements.

1.1 Previous Findings and Disposition

The first Certification Review for the York urbanized area was conducted in 2016. This is the second Certification Review. The previous Certification Review findings and their disposition are provided in Appendix C.

1.2 Summary of Current Findings

The review team determined that the metropolitan transportation planning process conducted in the York urbanized area meets the Federal planning requirements.

As a result of this review, FHWA and FTA are certifying the transportation planning process conducted by the Pennsylvania Department of Transportation (PennDOT), York Area Metropolitan Planning Organization (YAMPO) and Central Pennsylvania Transportation Authority (CPTA). There are also recommendations in this report that warrant close attention and follow-up, as well as areas that MPO is performing very well in that are to be commended.
## Summary of Findings

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| **Continuous, Cooperative, and Comprehensive** 23 CFR 450.306(a)&(b) 23 U.S.C. 134 (d) 23 CFR 450.314(a) | • The Review Team recommends YAMPO document significant metropolitan planning processes utilized by staff and committees, either in the bylaws or other appropriate internal documents. | • The Review Team commends the YAMPO for adding a Transit committee, as well as including representation from CPTA on the policy board and technical committee.  
• The Review Team commends YAMPO for the annual review of their bylaws. This provides a regular opportunity to ensure functional continuity regardless of changes in committee membership or staff.  
• The Review Team commends YAMPO staff for regional cooperation with neighboring MPOs to share resources and technical expertise. |
| **Transportation Improvement Program (TIP)** 23 U.S.C. 134(c)(h)&(j) 23 CFR 450.326 | • The Review Team recommends transit TIP narratives be expanded to demonstrate compliance with Transit Asset Management (TAM) requirements by using performance based planning language and to document how the project implements goals identified in the Transit Development Plan. | • The Review Team commends YAMPO staff and PennDOT District 8 on efforts to share information and develop a clear project selection process to incorporate the TAMP, TPM into the TIP and LRTP.  
• The Review Team commends the coordination between YAMPO and CPTA to identify and prioritize projects for the TIP, including using the Transit Development Plan and Annual Report of Transit Statistics (ARTS) to guide TIP development. |
| **Metropolitan Transportation Plan** 23 U.S.C. 134(c),(h)&(i) 23 CFR 450.324 | • The Review Team recommends that the MPO document the LRTP development process including how the conditions data, performance measures, and workgroup participation will be used to inform program development.  
• The Review Team recommends documenting how the MPO is utilizing PBPP, the TAMP, and TAM as part of the project development process and how the investment strategy will support progress towards meeting TPM targets. | • The Review Team commends the MPO’s efforts to develop effective stakeholder and agency collaboration by creating workgroups to promote participation. |
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| Multimodal and Transit Planning                 | • The Review Team recommends that YAMPO consider bike and pedestrian needs beyond the fixed route buffer by mapping crash data and other generators, such as schools, parks, and existing trails, as well as Environmental Justice (EJ) populations. | • The Review Team commends YAMPO and CPTA for their collaborative efforts demonstrated in the adoption of the TAM targets, and updating of the Transit Development Plan, and Annual Report of Transit Statistics.  
• The Review Team commends YAMPO for efforts to integrate bicycle and pedestrian planning in conjunction with transit planning and in coordination with CPTA.  
• The Review Team commends YAMPO for coordination with CPTA on all projects, including non-transit projects, which has resulted in CPTA being able to adjust services in advance of projects that would affect transit service. |
| Public Participation                            | • The Review Team recommends that in a future update to the PPP, YAMPO add a provision to provide an additional opportunity for public comment, if the final metropolitan transportation plan or TIP differs significantly from the version that was made available for public comment by the MPO. In addition, the Review Team recommends that YAMPO document the PPP update process including providing for a 45-day comment period. | • The Review Team commends YAMPO’s efforts to clearly define the PPP requirements for the TIP, STIP, LRTP, and CMP and annual documentation and evaluation of the effectiveness of participation strategies. |
| Civil Rights                                    | • The Team recommends that PennDOT continue to provide technical assistance to YAMPO and together they work to identify and remove references to rescinded guidance; and to address the procedural concerns related to the MPOs Title VI complaint process.  
• The Team recommends that before the next review YAMPO develop and include long-term strategies for conducting proactive outreach to its LEP populations, ensuring they are aware of the services it provides to them and meaningful opportunities to participate. | • The Review Team commends YAMPO’s efforts to study effective EJ outreach and analysis techniques through the South Central PA MPO Environmental Justice Unified Process and Methodology Guide. This was an essential piece in the development of the FHWA/FTA EJ Core Elements approach. YAMPO is currently serving in an EJ workgroup to support statewide implementation of the EJ Core Elements as part of the 2021 TIP/STIP update. |
### Review Area | Recommendation | Commendation
--- | --- | ---
List of Obligated Projects 23 U.S.C. 134(j)(7) and 23 CFR 450.334 | • The Team recommends the ADA Self-certification language is updated to reflect the correct regulatory citation by the next review cycle. | • The Review Team commends PennDOT’s efforts to identify an efficient and creative way to streamline the report process. |
Transportation Safety 23 U.S.C. 134(h)(1)(B) 23 CFR 450.306(a)(2) 23 CFR 450.306(d) 23 CFR 450.324(h) | • The Review Team recommends that YAMPO staff work with PennDOT Central Office and District 8 to develop a report that meets the requirements and provides explanatory detail for the public. | • The Review Team commends YAMPO for evaluating the impact of safety projects before and after construction. YAMPO and PennDOT District 8 also track RSA recommendations using a spreadsheet. This comprehensive tracking method is a commendable practice that is not done by most other agencies. |
Congestion Management Process, Operations 23 U.S.C. 134(k)(3) 23 CFR 450.322 | • The Review Team commends the MPO for its regional collaboration efforts with PennDOT and neighboring MPOs to improve safety and CMP programs along major corridors in the central Pennsylvania region. The York MPO is a leader in developing and implementing asset and congestion analysis of the transportation system. | |

Details of the findings for each of the above items are contained in this Report.
2.0 INTRODUCTION

2.1 Background

Pursuant to 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMAs) at least every four years. A TMA is an urbanized area, as defined by the U.S. Census Bureau, with a population of over 200,000. After the 2010 Census, the Secretary of Transportation designated 183 TMAs – 179 urbanized areas over 200,000 in population plus four urbanized areas that received special designation. In general, the reviews consist of three primary activities: a site visit, a review of planning products (in advance of and during the site visit), and preparation of a Certification Review Report that summarizes the review and offers findings. The reviews focus on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the MPO(s), the State DOT(s), and public transportation operator(s) in the conduct of the metropolitan transportation planning process. Joint FTA/FHWA Certification Review guidelines provide agency field reviewers with latitude and flexibility to tailor the review to reflect regional issues and needs. As a consequence, the scope and depth of the Certification Review reports will vary significantly.

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

While the Certification Review report itself may not fully document those many intermediate and ongoing checkpoints, the “findings” of Certification Review are, in fact, based upon the cumulative findings of the entire review effort.
The review process is individually tailored to focus on topics of significance in each metropolitan planning area. Federal reviewers prepare Certification Reports to document the results of the review process. The reports and final actions are the joint responsibility of the appropriate FHWA and FTA field offices, and their content will vary to reflect the planning process reviewed, whether or not they relate explicitly to formal “findings” of the review.

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

2.2 Purpose and Objective

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

The York Area Metropolitan Planning Organization (YAMPO) is the designated MPO for the York urbanized area. The Pennsylvania Department of Transportation (PennDOT) is the responsible State agency and the Central Pennsylvania Transportation Authority (CPTA) is the responsible public transportation operator. CPTA operates as rabbittransit which offers a fixed route bus service with 17 routes serving York and its surrounding suburbs, and three routes serving Hanover. CPTA also offers paratransit, mobility-on-demand, and commuter services through partnerships and rabbittransit. The primary members of YAMPO are the York County Planning Commission (YCPC), PennDOT, CPTA, York County Transportation Authority (YCTA), Legislative appointments, City of York, South Central York, Greater York East, Greater York West, Northern York, South Western York & South Eastern York. The YCPC provides staff support to the MPO. The study area includes all of the York metropolitan area with the City of York as the largest population center.

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

3.1 Review Process

York TMA’s initial Certification Review was conducted in 2016. A summary of the status of findings from the last review is provided in Appendix C. This Report details the second review, which consisted of a desk review, on-site visit and a public involvement opportunity, conducted in June 2019. Participants in the review included representatives of FHWA PA Division, FTA Region III, PennDOT Central Office and the District 8 Engineering Office, CPTA, and YAMPO staff. A full list of participants is included in Appendix A.

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

The Certification Review covers the transportation planning process conducted cooperatively by the MPO, State, and public transportation operators. Background information, current status, key findings, and recommendations are summarized in the body of the Report for the following subject areas selected by FHWA and FTA staff for the on-site review:

- Continuous, Cooperative, and Comprehensive Process – Documenting Roles and Processes
- Transportation Improvement Program (TIP)
- Metropolitan Transportation Plan (MTP) / Long Range Transportation Plan (LRTP)
- Multimodal and Transit Planning
- Public Participation and Access to Information
- Civil Rights (Title VI, Environmental Justice (EJ), Limited English Proficiency (LEP), Americans with Disabilities Act (ADA)
- Annual List of Obligated Projects
- Safety Planning
- Integrating Freight into the Transportation Planning Process
- Congestion Management Process (CMP)
3.2 Documents Reviewed

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

- Organization chart, membership and structure of Committees
- *Draft - Go York 2045: York County’s Long Range Transportation Plan*
- 2019 Transportation Improvement Program (TIP), Self-Certification, and TIP Checklist
- *2015 YAMPO Congestion Management Process (CMP)*
- 2016 Report on Congestion
- 2015 York County Bicycle and Pedestrian Connectivity and Safety Inventory
- *Public Participation Plan (PPP)*
- *Limited English Proficiency (LEP) Plan*
- Title VI Policy, Form, and Procedures
- 2018-2020 Unified Planning Work Program (UPWP)
- Traffic and Road Safety Studies
- 2019 Lancaster Equal Opportunity Questionnaire
- *Air Quality Conformity Process and Report for the 2019 TIP and LRTP*
- MPO Bylaws and Policies, and Agreements with the Transit Provider, PennDOT, and other planning agencies
- Annual List of Obligated Projects
- *2016 York TMA Certification Review Report*
4.0 PROGRAM REVIEW

4.1 Continuous, Cooperative, and Comprehensive Process – Documenting Roles and Processes

4.1.1 Regulatory Basis

23 CFR 450.306 (b) instructs MPOs to conduct the metropolitan planning process in a manner that is continuous, cooperative, and comprehensive, and provides for consideration and implementation of projects, strategies, and services. This is often referred to as the “3C” planning process.

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

23 CFR 450.306 (a) requires metropolitan planning organizations, in cooperation with the State and public transportation operators, to develop LRTPs and TIPs through a performance-driven, outcome-based approach to planning for metropolitan areas of the State.

4.1.2 Current Status

The YAMPO was established as the policy board to carry out the continuous, cooperative, and comprehensive transportation planning process to meet federal transportation planning regulations. The YAMPO is supported by staff resources provided through the York County Planning Commission (YCPC) and is advised on technical matters by the Transportation Technical Committee and the Transit Advisory Committee. The transit provider, CPTA, is represented as a voting member on both the policy board and technical committee.

In addition, there is a Transportation Coalition group which includes elected officials and stakeholders and meets on the third Thursday, every three months. At the on-site review, YAMPO staff provided an overview of the Transportation Coalition function. This group does not serve a formal role in the TMA, but it provides an opportunity for YAMPO staff and partners to educate members on transportation topics. At the on-site review, CPTA staff mentioned support
for the Transportation Coalition meetings which provide an opportunity for the transit provider to share priorities and brief local officials on transit topics and concerns.

**MPO Bylaws**

Bylaws and standard operating procedures help an MPO to implement the 3C planning process. YAMPO maintains a set of bylaws entitled *Bylaws and Procedures for the York Area Metropolitan Planning Organization (YAMPO)*. The MPO staff provided the Review Team with a copy of the document, which is also found online via a YAMPO webpage on the YCPC website. The Bylaws and Procedures describe the committees of the MPO and identify “current YAMPO policies and procedures.” The document also provides for annual review and outlines the amendment process. However, some important internal procedures described by MPO staff during the on-site visit are not described in the bylaws or other documents. One example is the preparation of public participation memos describing outreach for upcoming planning activities. Many YAMPO staff members have worked for the organization for many years. Procedures are well developed, though sometimes undocumented. If internal procedures are not well-documented, this institutional knowledge is at risk when staff changes.

**Cooperative Transportation Planning Process**

YAMPO is one of six MPOs in the PennDOT District 8 region. The District 8 Planning Partners work collaboratively to share technical resources and noteworthy practices. YAMPO has been a leader in this effort and has provided staff expertise to assist neighboring MPOs. Notable examples of this cooperative effort include: the South Central PA MPO Environmental Justice (EJ) Unified Process and Methodology Guide, the Congestion Management Process (CMP)/Safety Workgroup, and coordination on data collection with Adams and Franklin counties. The Review Team commends YAMPO and its partnering MPOs for this regional collaboration which strengthens the planning process.

**4.1.3 Findings**

**Commendation:**

- The Review Team commends the YAMPO for adding a Transit committee, as well as including representation from CPTA on the policy board and technical committee.
The Review Team commends YAMPO for the annual review of their bylaws. This provides a regular opportunity to ensure functional continuity regardless of changes in committee membership or staff.

The Review Team commends YAMPO staff for regional cooperation with neighboring MPOs to share resources and technical expertise.

Recommendations:

- The Review Team recommends YAMPO document significant metropolitan planning processes utilized by staff and committees, either in the bylaws or other appropriate internal documents.

4.3 Transportation Improvement Program (TIP)

4.3.1 Regulatory Basis

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

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

4.3.2 Current Status

In Pennsylvania, TIPs are developed through a cooperative process between PennDOT Central Office, the regional PennDOT District Office, and the MPO/RPO Planning Partners. In the York TMA, PennDOT District 8 leads the development of the TIP with YAMPO playing an important
role to convey local priorities, provide feedback, and ensure federal planning requirements are met. As part of this process, the YAMPO staff communicates locally-identified needs and shares data, leads the public participation process, conducts the Air Quality Transportation Conformity analysis, and develops the Environmental Justice outreach and burdens and benefits analysis. The YAMPO developed a TIP project selection criteria flowchart which shows how the MPO prioritizes projects for Safety, Bridges, Maintenance, and Transportation Alternatives.

At the on-site review, the Review Team asked questions regarding the 2019 TIP development process and enhancements planned for the upcoming 2021 TIP cycle. YAMPO and District 8 staff indicated they worked together to develop the 2019 TIP which was approved by the YAMPO on June 28th, 2018. Much of the TIP was developed by PennDOT which includes carryover projects, projects from the Twelve-Year Program (TYP), Decade of Investment (DOI) projects, and new candidate projects. New candidate projects were initially identified and evaluated by an internal District 8 “A-team” which includes: the District Executive, the Assistant District Executive of Maintenance, the Assistant District Executive of Design, the Highway Design Engineer, the District Traffic Engineer, the County Maintenance Manager and the Planning and Programming Manager. In addition, the District Bridge Unit (District Bridge Engineer, Assistant District Bridge Engineer, Assistant District Executive of Design, and Assistant District Executive of Maintenance) identified priorities based on semi-annual and annual bridge inspections. The internal PennDOT team reviewed and prioritized projects to develop a draft TIP and ensure asset management goals are achieved. The draft TIP was shared with YAMPO staff for review and feedback. YAMPO staff played a key role in TIP development by sharing data resources and local priorities.

At the on-site Review, the 2021 TIP development process was discussed. The PennDOT District 8 staff indicated efforts have begun to identify carryover and candidate projects. The District is working to integrate Transportation Performance Measures (TPM) into the development process and is currently developing an internal ranking system to utilize the Transportation Asset Management Plan (TAMP), Bridge Asset Management System (BAMS), and Pavement Asset Management System (PAMS) data. This approach will consider both the National Highway System, state routes, and local road network. YAMPO staff indicated that they plan to utilize the District’s new TIP development process for the upcoming LRTP to integrate TPM. The District relies on YAMPO to identify local needs and to share findings from planning efforts including corridor studies, safety planning, the Capital Investment Plan (CIP), Bridge Prioritization Plan, Annual Pavement and Bridge Report, Annual Report on Congestion (ARC), and the I-83 Traffic and Conditions Report. The District is also working with YAMPO staff to filter candidate projects
through the PennDOT Connects process (see below). For more information on the TIP development process for safety projects, please see Section 4.9. The Review Team commends YAMPO staff and PennDOT District 8 on efforts to share information and develop a clear project selection process to incorporate the TAMP and TPM into the TIP and Long Range Transportation Plan (LRTP).

**Surface Transportation Program Urban (STP-Urban) Funding and TIP**

MAP-21 includes a funding category identified as Surface Transportation Program (STP) providing flexible funding that may be used by PennDOT and the Planning Partners for projects to preserve and improve the conditions and performance on any Federal-aid highway, bridge and tunnel project located on any public road as well as bicycle and pedestrian infrastructure. In particular, MAP-21 includes a formula in which 50% of PennDOT’s STP apportionment, after Transportation Alternatives and Statewide Planning and Research set-asides, is provided to areas with populations over 200,000. Under the FAST Act, STP-Urban funds were redefined and grouped under the Surface Transportation Block Grant (STBG) Program. For MPOs that have a population of 200,000 or more, MAP-21 and the FAST Act allow MPOs to focus the referenced apportionment on their urban area. In this instance, YAMPO does not differentiate their STBG funds. However, YAMPO focuses their funding on the urbanized area.

**Transit**

In 2017, the YAMPO added a Transit committee, which is comprised of the CPTA Board of Directors which has three members from Adams County, three members from York County, and two members from Cumberland County. The Transit Committee is responsible for coming up with the Transit TIP, which they develop in coordination with PennDOT and YAMPO, before adoption by the YAMPO Coordinating Committee. CPTA uses information from the *Annual Report of Transit Statistics (ARTS)*, as well as information gathered for NTD reporting to identify projects for the TIP. CPTA has a Transit Asset Management Plan (TAMP) and YAMPO has adopted the transit targets identified within the TAMP, which guide projects for the TIP.

**PennDOT Connects**

The Linking Planning and NEPA (LPN) system was replaced by the PennDOT Connects system, a GIS-based system which seeks to encourage early consideration and collaboration between PennDOT, MPOs/RPOs, municipalities and other stakeholders, making the planning process more
collaborative, efficient and cost effective. This system is used to coordinate and document municipal engagement and capture environmental considerations and possible mitigation strategies that are identified. The information identified in the planning phase is passed on to the District Project Manager and is carried over into NEPA and Preliminary Engineering (PE).

The MPO is committed to continuing LPN efforts by evaluating needs and identifying potential alternatives before projects are programmed on the TIP. To achieve this goal, the MPO has an open-ended consultant agreement to identify and develop concepts and potential NEPA impacts prior to TIP development.

4.3.3 Findings

Commendation:

- The Review Team commends YAMPO staff and PennDOT District 8 on efforts to share information and develop a clear project selection process to incorporate the TAMP, TPM into the TIP and LRTP.
- The Review Team commends the coordination between YAMPO and CPTA to identify and prioritize projects for the TIP, including using the Transit Development Plan and Annual Report of Transit Statistics (ARTS) to guide TIP development.

Recommendations:

- The Review Team recommends the transit TIP narratives be expanded to demonstrate compliance with Transit Asset Management (TAM) requirements by using performance based planning language and to document how the project implements goals identified in the Transit Development Plan.

4.4 Metropolitan Transportation Plan (MTP) / Long Range Transportation Plan (LRTP)

4.4.1 Regulatory Basis

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

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

23 U.S.C. 134(i)(2)(D) and 23 CFR 450.324(f)(10) require environmental mitigation be set forth in connection with the MTP. The MTP is required to include a discussion of types of potential environmental mitigation activities for the transportation improvements and potential locations to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the Plan.

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

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

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

YAMPO’s LRTP was last adopted in 2017 and efforts are well underway to update the LRTP for 2021. The MPO provided a draft copy of Go York 2045: York County’s Long Range Transportation Plan and the findings below are based on the review of the draft Plan and discussion at the on-site review.

To support the LRTP update process, YAMPO formed five stakeholder workgroups which include: commerce and industry, movement of people, environment, safety and security, and asset management. The stakeholder workgroups met in 2018 and future meetings are planned. The update effort is guided by a 26-person steering committee. The steering committee includes a diverse set of representatives including: 3P-Ride, Carroll Township, Center for Traffic Safety, City of York, Commuter Services of Pennsylvania, Crispus Attucks, CS Davidson, Delta Borough, Farm and Natural Lands Trust of York County, FHWA, Hanover Area Chamber of Commerce, Healthy York County Coalition, Human Relations Commission, PennDOT Central Office, PennDOT District 8, Pennsylvania State Police, Pennsylvania State Transportation Commission, CPTA, Realtors Association of York and Adams Counties, Wellspan, YAMPO Coordinating Committee, YAMPO Technical Committee, York County Commissioners, York County Economic Alliance, York County Hispanic Coalition, and YCPC. In addition to the stakeholder outreach, YAMPO released an online survey in March 2018 to collect feedback on the LRTP goals and objectives. YAMPO publicized the survey through press releases, announcements at the York PennDOT Driver License Center, Commuter Services, rabbit transit buses, and email alerts to the YAMPO mailing list which included organizations that represent traditionally underserved populations. YAMPO collected 340 responses on the survey which helped shape the Plan objectives and goals. As the LRTP progresses, YAMPO plans to continue public outreach in accordance with the PPP.

The LRTP identifies ten objectives which were refined and prioritized by YAMPO, the steering committee, stakeholder workgroups, and the public. For each objective, there are numerous response actions identified. The actions utilize data, current conditions, and performance metrics to identify strategies that can be pursued by YAMPO to advance each objective.

Data-Driven Process

YAMPO gathers and tracks a wealth of data as part of the transportation planning efforts. This data is applied in the LRTP. The Go York 2045 website includes an advanced webmapping platform which visualizes the data in an easy to understand format. This includes mapping of
natural features, commuting patterns, airports, bike corridors, bridges, rabbittransit fixed routes and ridership trends, bus conditions, pavement conditions by International Roughness Index (IRI), traffic signals and connected corridors, the National Highway Freight Network, park and ride lots, and railroads. This format encourages visitors to explore and understand the data. Some of the graphics include a data analysis component which is helpful to provide context. For example, the bus conditions and replacement data is compared with the available resources to demonstrate the unmet needs and help to prioritize potential funding gaps.

In addition to the online webmaps, YAMPO has published a Performance Measures Report which tracks performance trends for 66 different indicators. The data is substantial and provides a multi-year perspective. Some of the performance measures are tied to the Objectives and Actions identified in the Plan. However, additional detail and context is needed to describe how the results might influence the planning efforts. Without this context, the public and stakeholders may not be aware of the significance or importance of the data.

In addition to the resources posted online, YAMPO maintains several planning tools which inform the LRTP development process. This includes the Bridge Prioritization Plan, Annual Pavement and Bridge Report, Annual Report on Transit Statistics, Annual Report on Congestion, and Capital Investment Plan (CIP). These tools are used by YAMPO to track data trends and inform project selection. The CIP serves a critical role in the LRTP and TIP project development process. In the 2017 LRTP, YAMPO developed the companion CIP which identified the capital investments planned for the 2017-2040 LRTP. The TIP is the first four years of the CIP. The CIP set investment levels for Capacity, Maintenance, Bridges, Safety, and Transit. The majority of the projected funding was shown in a general line item under each investment category and not allocated to a specific project. In the first twelve years of the plan, projects were identified if they exceeded $5 million dollars or were located on the National Highway System (NHS). In the outer years of the plan, projects were identified if they exceeded $10 million dollars or were on the NHS. YAMPO included a cost estimate and scope to maintain fiscal constraint and conduct Air Quality Conformity for projects listed on the CIP. The CIP is a living document. YAMPO utilizes its project selection criteria to identify candidate projects to add to the TIP. When the TIP is amended, the CIP is also modified. The Review Team commends YAMPO’s efforts to collect and track data to make informed transportation planning decisions.

At the on-site review, the Review Team discussed the importance of incorporating Performance Based Planning and Programming (PBPP) and TPM into the LRTP. YAMPO acknowledged this requirement and shared a few examples of how the MPO planned to incorporate PBPP and TPM.
The MPO is currently tracking its progress on Performance Measures through the *Performance Measures Report* which is included in the LRTP. The MPO is working with PennDOT District 8 to incorporate TPM into the 2021 TIP update process. As part of this process, the District is working with MPOs in the region to develop project selection criteria that utilizes the *TAMP* and supports the Performance Measure targets. YAMPO plans to adapt this criterion to the LRTP project selection process. This is a commendable effort as it meets the TPM requirements and demonstrates alignment between the TIP and LRTP. As these efforts continue, the Review Team recommends that the MPO work with PennDOT to document the process and demonstrate how the projects programmed on the LRTP will support the attainment of the Performance Measure targets.

**Environmental Mitigation**

YAMPO demonstrates consideration of environmental resources, stormwater and air quality in the 2045 Draft LRTP and throughout the planning process, meeting the requirements outlined in 23 CFR 450.324(f)(10). YAMPO also demonstrates good use of current public involvement practices, such as online solicitation of feedback, to gauge public interest in the topics of environmental stewardship and preservation.

YAMPO has created an environmental workgroup in order to more effectively engage resource agencies and stakeholders in the planning process. Thus far, they have held three stakeholder meetings to discuss the development of the 2045 LRTP. YAMPO has also been involved in York County’s Stormwater Consortium, in which the County, MPO and PennDOT are able to collaborate on stormwater issues and projects. The Review Team encourages YAMPO to revisit and review the area’s environmental features every four years when the LRTP is updated in order to ensure consistency and to note any changes that may have occurred over time. The Review Team commends YAMPO for its agency coordination efforts and encourages it to continue outreach to relevant agencies, tribes and stakeholders throughout development of the LRTP, particularly regarding identifying early mitigation strategies. The Review Team recommends that YAMPO develop and document its approach for identifying potential environmental mitigation strategies in the 2045 LRTP.

**Transit**

Transit representatives have been included in the development of the LRTP, including having transit members on at least three out of the five LRTP committees. Advertisements and
information regarding the LRTP have been placed on rabbittransit buses, but there has not been an effort to specifically capture or record transit rider input or needs through intercept surveys or similar outreach efforts.

**Transit Oriented Development**

Within the draft LRTP there are opportunities to integrate transit as an element in achieving the goals and priorities or expand on the role transit plays in those objectives. An example is objectives surrounding Public-Private Partnership (P3) opportunities. Specifically, one of the identified areas to accomplish Objective 1: Improve Accessibility mentions how YAMPO staff review plans for land development in York County and this offers an opportunity to make suggestions for roadway, pedestrian, and transit improvements. These interactions also offer an opportunity to emphasize and discuss Transit Oriented Development (TOD) elements. While TOD traditionally has occurred centered around major transit stations, it also can be focused around smaller networks where the principles behind it are still prevalent. Development that includes or features a mix of commercial, residential, office and entertainment located near transit creates more connected and vibrant communities. TOD primarily occurs when regional or local governments encourage it through land use planning, and zoning laws. When a TOD coincides with a federally funded transit project, FTA may provide financial assistance, technical assistance, training, and other resources to complement the regional or local TOD. The Review Team recommends the MPO explore opportunities to incorporate Transit and TOD-based projects into some of the other sections of the LRTP.

4.4.3 Findings

**Commendation:**

- The Review Team commends the MPO’s efforts to develop effective stakeholder and agency collaboration by creating workgroups to promote participation.

**Recommendations:**

- The Review Team recommends that the MPO document the LRTP development process including how the conditions data, performance measures, and workgroup participation will be used to inform program development.
• The Review Team recommends documenting how the MPO is utilizing PBPP, the TAMP, and TAM as part of the project development process and how the investment strategy will support progress towards meeting TPM targets.

4.5 Multimodal and Transit Planning

4.5.1 Regulatory Basis

49 U.S.C. 5303 and 23 U.S.C. 134 require that the transportation planning process in metropolitan areas consider all modes of travel in the development of their plans and programs. Federal regulations cited in 23 CFR 450.312 state that the MPO in cooperation with the State and operators of publicly owned transit services shall be responsible for carrying out the transportation planning process.

23 U.S.C. 217(g) states that bicyclists and pedestrians shall be given due consideration in the comprehensive transportation plans developed by each MPO under 23 U.S.C. 134. Bicycle transportation facilities and pedestrian walkways shall be considered, where appropriate, in conjunction with all new construction and reconstruction of transportation facilities.

23 CFR 450.200, 23 CFR 450.300, 23 U.S.C. 134(h), and 135(d)) require that non-motorists must be allowed to participate in the planning process and transportation agencies are required to integrate walking and bicycling facilities and programs in their transportation plans to ensure the operability of an intermodal transportation system.

23 CFR 450.306(a) requires that the metropolitan planning process "address the following factors... (2) Increase the safety for motorized and non-motorized users; (3) Increase the security of the transportation system for motorized and non-motorized users; (4) Protect and enhance the environment, promote energy conservation, improve the quality of life..."

23 CFR 450.322(f) requires that metropolitan transportation plans "...shall, at a minimum, include...existing and proposed transportation facilities (including major roadways, transit, multimodal and intermodal facilities, pedestrian walkways and bicycle facilities, and intermodal connectors that should function as an integrated metropolitan transportation system)."

23 CFR 450.316(a) requires that "[t]he MPOs shall develop and use a documented participation plan that defines a process for providing...representatives of users of pedestrian walkways and
bicycle transportation facilities, and representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan planning process."

23 U.S.C. 134(c)(2) and 49 U.S.C. 5303(c)(2) require that plans and transportation improvement programs (TIPs) of all metropolitan areas "shall provide for the development and integrated management and operation of transportation systems and facilities (including accessible pedestrian walkways and bicycle transportation facilities)."

23 CFR 450.324(c) states that the TIP "shall include ...trail projects, pedestrian walkways, and bicycle facilities..."

4.5.2 Current Status

In the York TMA, CPTA is the regional public transportation provider, and offers a variety of transportation services to the residents of the following counties: Adams, Columbia, Cumberland, Franklin, Montour, Northumberland, Perry, Snyder, Union and York. CPTA operates as rabbittransit which offers a fixed route bus service with 17 routes serving York and its surrounding suburbs, and three routes serving Hanover. CPTA also offers paratransit, mobility on demand and commuter services through partnerships and rabbittransit.

Regional Transit Collaboration

CPTA plays a formal role within the MPO, serving on the Coordinating and Technical committees, as well as having its Board of Directors make up the Transit committee. The CPTA Executive Director, Rich Farr, staff from CPTA, and MPO staff all emphasized at the on-site review that the transit agency and MPO collaborate very effectively.

Staff from CPTA made clear that the incorporation of transit into transportation planning is not an afterthought, and that transit continues to play a growing role in the regional planning process. One of the examples of the high-level of collaboration and coordination between YAMPO and CPTA staff concerned what would normally not be regarded as a transit related project. YAMPO identified a bridge with the potential to be posted and weight restricted and advised CPTA so they were able to conduct route analysis and make the necessary adjustments in advance of any closures associated with the bridge. In addition, YAMPO staff identified ways they have focused intermodal planning around their transit resources such as developing bike and pedestrian improvements around Transit resources. Finally, YAMPO and CPTA staff discussed
collaboration on the adoption of the TAM targets, and updating of the *Transit Development Plan*, and *Annual Report of Transit Statistics*.

**Transit Ridership Trends**

YAMPO and CPTA coordinate to update the ARTS, and use information regarding ridership trends to update the Transit Development Plan, which guides their TIP development. Together they have identified causes of declines in ridership trends and identified different approaches to address those trends and increase ridership. They have also coordinated to adjust routes to best serve the community and its needs with services like the GIANT Shuttle service.

**Bike and Pedestrian Planning**

YAMPO is actively engaged in bicycle and pedestrian planning efforts and the MPO adopted the *York County Bicycle and Pedestrian Connectivity and Safety Inventory* in 2015. As part of the inventory, the MPO evaluates connections and bike and pedestrian facilities within a buffer around the rabbittransit fixed route service area. YAMPO is also using PennDOT Connects to determine if current and future projects intersect with bus routes and how connectivity improvements may be incorporated into these projects. The draft 2045 LRTP identifies these priority locations and makes a commitment to focus efforts on improving bike and pedestrian access in these areas. The Review Team recommends that YAMPO determine if there are additional strategies it can use to identify potential bike and pedestrian needs outside of this buffer area. For example, this may include mapping crash data to determine if there is a safety need and identifying other traffic generators that may exist outside of this buffer, such as schools, parks, existing trails, and other resources.

The draft 2045 LRTP also outlines YAMPO’s plans to organize a bicycle and pedestrian planning committee. The MPO will aim to identify individuals from the bicycle and pedestrian communities to represent their respective interests as advisory members and to incorporate early consideration of bicycle/pedestrian issues as they relate to current and future projects. It should be noted that YAMPO elected an advisory member to its technical committee two years ago and believes this has been a great benefit in considering the personal and public health implications of transportation projects.

The City of York began using the bikeshare program Zagster in June of 2017, which is funded through a grant by the York City Bureau of Health. The program presently includes 19 bicycles at four different locations on or near the York County Heritage Rail Trail. This program offers
residents an affordable option for both commuting and recreation. There is an action item included in the draft 2045 LRTP to expand this program by encouraging municipalities within York County to include additional Zagster stations. At the on-site review, there was discussion regarding additional federal funding sources, such as the Congestion Mitigation and Air Quality Improvement Program (CMAQ), that could be utilized to expand the bikeshare program.

4.5.3 Findings

Commendation:

- The Review Team commends YAMPO and CPTA for their collaborative efforts demonstrated in the adoption of the TAM targets, and updating of the Transit Development Plan, and Annual Report of Transit Statistics.
- The Review Team commends YAMPO for efforts to integrate bicycle and pedestrian planning in conjunction with transit planning and in coordination with CPTA.
- The Review Team commends YAMPO for coordination with CPTA on all projects, including non-transit projects, which has resulted in CPTA being able to adjust services in advance of projects that would affect transit service.

Recommendation:

- The Review Team recommends that YAMPO consider bike and pedestrian needs beyond the fixed route buffer by mapping crash data and other generators, such as schools, parks, and existing trails, as well as Environmental Justice (EJ) populations.

4.6 Public Participation and Access to Information

4.6.1 Regulatory Basis

Sections 134(i)(5), 134(j)(1)(B) of Title 23 and Section 5303(i)(5) and 5303(j)(1)(B) of Title 49, require MPOs to provide adequate opportunity for the public to participate in and comment on the planning processes and products. The requirements for public involvement are detailed in 23 CFR 450.316(a) and (b), which require the MPO to develop and use a documented participation plan that includes explicit procedures and strategies to include the public and other interested parties in the transportation planning process.
Specific requirements include: giving adequate and timely notice of opportunities to participate in or comment on transportation issues and processes, employing visualization techniques to describe metropolitan transportation plans and TIPs, making public information readily available in electronically accessible formats and means such as the world wide web, holding public meetings at convenient and accessible locations and times, demonstrating explicit consideration and response to public input, and periodically reviewing the effectiveness of the participation plan.

4.6.2 Current Status

The YAMPO Public Participation Plan (PPP) was last updated 2017. The PPP does an excellent job of describing the specific public involvement requirements YAMPO has committed to for the TIP, LRTP, amendments, the Congestion Management Process (CMP), and other plans. The plan establishes a process using the “Ladder of Involvement” to determine the strategies that will be used for other public outreach methods. YAMPO staff select the step of public participation most appropriate for the plan or document. The staff then develops a memo to the technical committee outlining the strategy that will be used and documenting specific steps for public involvement. This process provides for flexibility and responsiveness and is commended. However, this process is not currently documented in the PPP and the Review Team recommends that YAMPO document the memo process in a future PPP update.

The Review Team asked the YAMPO staff to explain the process for public comment on the LRTP and TIP. The PPP provides clear commitments on public involvement requirements for both documents. However, there is not currently a documented procedure for providing an additional opportunity for public comment, if the final LRTP or TIP differs significantly from the version that was made available for public comment by the MPO. The Review Team recommends that the YCPC add this provision in a future PPP update.

The MPO discussed strategies for outreach to traditionally underserved populations. YCPC staff indicated that they identify stakeholders and organizations to serve as representatives of the traditionally underserved populations. These organizations participate in various ways from representation on committees to participation in the LRTP and TIP update process. In addition, YCPC does direct mailings to organizations to solicit their input.

The YCPC staff conducts an annual evaluation of the PPP and documents efforts in an annual report. The results are impressive and demonstrate the MPO’s commitment to public
participation. The PPP includes general requirements, but does not specify the process for how the MPO evaluates the effectiveness of the plan. In addition, the PPP does not specify that a 45-day public comment period will be required for future updates and adoption of the PPP. The Review Team recommends the MPO add this provision into a future PPP update.

**Website and Notices**

YAMPO provides electronic access to public information through webpages on the York County Planning Commission website. The webpages provide information about the MPO, committees, meetings, staff, and planning documents. The MPO staff provides adequate notice of MPO meetings and other opportunities for public involvement, in accordance with their PPP. Members of the public can sign up for alerts through a “Notify Me” application. However, some officially adopted or approved documents remain on the website marked as “Draft.” Examples include several of the 2019-2022 TIP documents and the 2017 update of the *Long Range Transportation Plan*. This may cause confusion to the public and stakeholders. The Review Team recommends that the MPO staff replace draft documents posted to the website with final documents, once the final version is approved or adopted.

### 4.6.3 Findings

**Commendations:**

- The Review Team commends YAMPO’s efforts to clearly define the PPP requirements for the TIP, STIP, LRTP, and CMP and annual documentation and evaluation of the effectiveness of participation strategies.

**Recommendations:**

- The Review Team recommends that in a future update to the PPP, YAMPO add a provision to provide an additional opportunity for public comment, if the final metropolitan transportation plan or TIP differs significantly from the version that was made available for public comment by the MPO.

In addition, the Review Team recommends that YAMPO document the PPP update process including providing for a 45-day comment period.
4.7 Civil Rights (Title VI, Environmental Justice (EJ), Limited English Proficiency (LEP), Americans with Disabilities Act (ADA))

4.7.1 Regulatory Basis

Title VI of the Civil Rights Act of 1964 prohibits discrimination based upon race, color, and national origin. Specifically, 42 U.S.C. 2000d states that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” In addition to Title VI, there are other Nondiscrimination statutes that afford legal protection. These statutes include the following: Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 U.S.C. 324), Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act (ADA) of 1990. ADA specifies that programs and activities funded with Federal dollars are prohibited from discrimination based on disability.

Executive Order #13166 (Limited-English-Proficiency) requires agencies to ensure that limited English proficiency persons can meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency.

4.7.2 Current Status

Title VI

YAMPO’s previous review provided two Title VI recommendations:

- The Review Team recommended that YAMPO develop, adopt, and distribute a Title VI Policy Statement internally and externally. In future updates to the various documents that the MPO makes available to the public, the MPO should consider including the Title VI Policy Statement, as well as a Title VI contact person and contact information (should they have a complaint).

- The Review Team recommended that YAMPO, in consultation with PennDOT BEO, revise its Title VI Complaint Process to distinguish between the formal complaint and a grievance (informal) complaint process. Revisions should include the following: ensuring that complainants are aware of their right to file a formal complaint with the concerned Operating Administration at any time during the informal process; the steps to notify
PennDOT that the MPO received an informal complaint and its resolution; and the specific timelines for resolving the informal complaint.

The YAMPO addressed the first recommendation by developing and distributing a Title VI Policy Statement. Generally, the document is a broad declaration of YAMPO nondiscrimination policy. The policy includes coverage for protected classes that are in addition to race, color and national origin. Likewise, YAMPO addressed the Review Team’s second recommendation through a detailed Title VI Complaint process and procedure on its website. Further, clarification was added consistent with the recommendation. The process explains that the complainant may file a Title VI complaint directly with YAMPO; and that the Title VI Compliance Officer will engage in/complete an investigation of the complaint, but the individual may also file a complaint with the Operating Administration.

Title 49 Code of Federal Regulations (CFR) 21.9(b) provides that the primary recipient may require from other recipients such information as it deems necessary to ensure its compliance. Consistent with this regulatory direction, 23 CFR 200.9, and other Title VI related guidance provided by FHWA, the State Department of Transportation (DOT) required MPOs to submit broad policy statements that extended the Title VI protected class beyond the statutorily required groups. On April 25, 2019, FHWA rescinded the guidance which resulted in broad class protections; and, restated the initial intent of Title VI to provide protections against discrimination based on race, color and national origin. This guidance was subsequently issued to State DOTs and included direction to realign the FHWA program with the statutorily protected classes. On June 18, 2019, PennDOT issued internal direction consistent with FHWA’s rescission direction. Additionally, FHWA issued clarifying guidance regarding the processing of Title VI related complaints. Specifically, on February 5, 2019, FHWA conducted a webinar for FHWA and State DOTs concerning requirements associated with routing, processing, and investigating complaints of discrimination on the basis of Title VI. The webinar covered not only the primary recipient routing obligations but also addressed subrecipient routing. The guidance specifically directed recipients, regardless of tier, to route all Title VI complaints through the Federal-aid highway oversight hierarchy until the complaint reaches Headquarters Civil Rights for further processing.

Based on this information, the Review Team finds that YAMPO has references to outdated guidance on its website and its publicly accessible documents. The Review Team also finds that the MPOs existing complaint process does not conform with current FHWA guidance. However, the Review Team acknowledges the short time-period with which FHWA issued the guidance may
not have permitted YAMPO and PennDOT sufficient time to address changes before the on-site review. The Review Team concludes that PennDOT and YAMPO should address the concerns sooner rather than later due to the important mandates that Title VI and its implementation seek to address. The Review Team recommends PennDOT continue to provide technical assistance to YAMPO and together they work to identify and remove references to rescinded guidance; and to address the procedural concerns related to the MPOs Title VI complaint process. At the time of this Report writing, YAMPO is working with the FHWA PA Division and PennDOT Bureau of Equal Opportunity (BEO) to update its internal procedures to address the recommendation.

**Limited-English Proficiency (LEP)**

YAMPO’s previous review provided one LEP recommendation:

- The Review Team recommended that YAMPO, in consultation with PennDOT BEO, develop a Limited English Proficiency (LEP) Plan consistent with DOT’s LEP guidance.

YAMPO, with technical assistance from PennDOT, is developing a LEP Plan. At the time of the review, the Plan was in draft. Accordingly, the Review Team examined the public participation strategies and opportunities the MPO uses to involve traditionally underserved populations. One strategy the Review Team observed was language assistive services provided through the website vis-à-vis the Google translate tool. In addition, the Review Team observed that YAMPO provides several documents in PDF formats which are generally not translatable using the online translation tool; however, an individual desiring translation may request document translations through the website at the “Reports & Documents” page and a link directs users to the “Document Translation Request Form”.

Additionally, the Review Team observed that the PPP includes a notice informing the public as to the availability of alternate languages and formats of the PPP and other documents upon requests. The PPP also discusses a toolbox of outreach strategies that the MPO may use depending on several considerations. Furthermore, the LEP Plan includes Language Tag Lines (Appendix B) – text that advises individuals on obtaining language assistance services free of charge in eight languages. The YAMPO staff advised that it intends to place the Language Tag Lines in documents to facilitate requests for translations; however, the contract for language line services had not been executed at the time of the review.

The Review Team observed a rather extensive list of businesses, human services, women, aging, and disability groups that were consulted in the development of the PPP. Inquiries made to the
YAMPO provided additional information that revealed many groups that represent minority and low-income constituencies. YAMPO acknowledged during discussions that it does not have a long-term outreach strategy. The Review Team noted the LEP Plan will be updated, generally on a schedule consistent with the PPP.

Title 49 CFR 21.9(d) provides that recipients are to provide participants and beneficiaries with information that apprises them of Title VI relevance to the recipient’s programs and the protections afforded under the Act. The regulation further provides that information must be provided in such manner as the US DOT Secretary determines necessary. In 2005, US DOT issued guidance related to recipient’s responsibilities to LEP individuals. The guidance expresses the Federal Government’s commitment to “improving the accessibility of…programs and activities to eligible LEP persons…” Moreover, the guidance notes recipients’ “obligation to reduce language barriers that can preclude meaningful access by LEP persons to important government services.” Title 23 CFR 450.316(a)(1)(vii) further requires MPOs to engage in proactive outreach strategies that “[seek] out . . .those traditionally underserved by existing transportation systems.”

The guidance is clear that the mix of language services that a recipient must provide should be made considering what is necessary and reasonable. Recipients are afforded substantial flexibility in determining the appropriate mix. Further, the guidance acknowledges that it may be cost prohibitive for an entity with many languages present in its jurisdiction and therefore advises that the recipient should translate vital documents into “several of the more frequently encountered languages.” Moreover, the guidance goes on to express the expectation that the recipient will establish “benchmarks for continued translations into the remaining languages over time.” A recipient will meet this expectation through the “implementation of a comprehensive system . . . that . . . evolves over time as it is implemented and periodically re-evaluated. . . DOT will look favorably upon intermediate steps recipients take that are . . .part of a broader implementation plan or schedule. . .”

The Review Team finds that YAMPO, at time of the on-site review, was in the process of addressing the LEP Plan development recommendation made during the previous review. Despite not having fully addressed the recommendation, the Review Team observed positive changes in how the MPO is attempting to engage its LEP population. Nonetheless, the Review Team concludes that YAMPO should continue moving forward toward adoption of the Plan, execution of the language line contract and future consideration of long-term outreach strategies to ensure meaningful engagement by the LEP population. Accordingly, the Review Team recommends that before the next Certification Review YAMPO develop and include long-term
strategies for conducting proactive outreach to ensure its LEP populations are aware of the services it provides them with to ensure meaningful opportunities to participate.

**ADA Self-Certification**

There were no previous Civil Rights related recommendations or findings regarding YAMPOs ADA Self-Certification.

The YAMPO Self-Certification was approved and adopted in accordance with relevant procedures on June 28, 2018 and for the 2019 TIP. During the desk review, the Review Team observed that the introductory statement related to the MPOs commitment and fulfillment of its ADA related responsibilities omits two regulations and incorrectly references another. Specifically, the references in question are 49 CFR 29 (incorrect reference) and 49 CFR 37 and 38 (omitted references). During discussions with YAMPO, the Review Team sought clarification on this issue. YAMPO informed the Review Team that the MPO took the information from a template document that was provided by PennDOT. The Review Team presented questions to YAMPO to understand whether its ADA Self-Certification would have been valid had the appropriate references been provided. According to YAMPO, the Title VI Coordinator is the designated responsible employee to coordinate its efforts to comply with the ADA. In addition, YAMPO provided that this information is posted everywhere its existing Title VI Policy Statement is posted, including contact information and complaint procedures.

Based on the Review Team’s evaluation of the Title VI Policy Statement, complaint procedure and website, the Review Team finds that YAMPO has met the obligation to identify a responsible individual to coordinate its compliance with the ADA, provide notice of who that individual employee is; and, developed a method to address complaints, as appropriate. Accordingly, the Review Team concludes that YAMPO is in compliance with its ADA Self-Certification requirements; however, the Review Team recommends that the ADA Self-certification language is updated to reflect the correct regulatory citation by the next review cycle.

**Environmental Justice (EJ)**

In the 2016 Certification Review, the Review Team provided a recommendation to the MPO to expand its outreach efforts to increase Environmental Justice (EJ) population participation in the planning process as well as consider expanding its EJ analysis. Since this time, YAMPO has taken a lead role to improve EJ analysis in York County and statewide. In 2017, YAMPO partnered with
the other District 8 MPOs and PennDOT to develop the South Central PA MPO Environmental Justice Unified Process and Methodology Guide. The Guide presents a methodology to improve the process to evaluate the potential impacts of transportation plans and programs on low-income and minority populations. The methodology includes several noteworthy practices adopted from MPOs around the Country. The FHWA PA Division and FTA Region III reviewed the Guide and identified Core Elements which can be incorporated by MPOs/RPOs to meet the spirit and intent of the Executive Order 12898, DOT’s Environmental Order 5610.2(a), FHWA Order 6640.23A, and FTA’s Environmental Justice Circular 4703.1. YAMPO is continuing to support implementation efforts by serving on an EJ workgroup to integrate the process in the 2021 TIP/STIP development process.

4.7.3 Findings

Commendation:

- The Review Team commends YAMPO’s efforts to study effective EJ outreach and analysis techniques through the South Central PA MPO Environmental Justice Unified Process and Methodology Guide. This was an essential piece in the development of the FHWA/FTA EJ Core Elements approach. YAMPO is currently serving on an EJ workgroup to support statewide implementation of the EJ Core Elements as part of the 2021 TIP/STIP update.

Recommendations:

- The Review Team recommends that PennDOT continue to provide technical assistance to YAMPO and together they work to identify and remove references to rescinded guidance; and to address the procedural concerns related to the MPOs Title VI complaint process.
- The Review Team recommends that before the next review YAMPO develop and include long-term strategies for conducting proactive outreach to its LEP populations, ensuring they are aware of the services it provides to them and meaningful opportunities to participate.
- The Review Team recommends the ADA Self-certification language is updated to reflect the correct regulatory citation by the next review cycle.
4.8 Annual List of Obligated Projects

4.8.1 Regulatory Basis

23 U.S.C. 134(j)(7) and 23 CFR 450.334 requires that the State, the MPO, and public transportation operators cooperatively develop a listing of projects for which Federal funds under 23 U.S.C. or 49 U.S. C. Chapter 53 have been obligated in the previous year. 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 project; and
- Identification of the agencies responsible for carrying out the project.

4.8.2 Current Status

YAMPO staff provided a copy of the current Annual Listing of Obligated Projects which is posted on the YCPC website. The report is generated by PennDOT Central Office Program Center and provided to YAMPO staff for posting. The report is entitled “FFY 2017 York TIP with State Match, Encumbrances and Expenditures” which may cause confusion as it does not specify that this report is intended to meet the 23 CFR 450.334 requirements. The Review Team recommends indicating that this report is the “Annual Listing of Obligated Projects” on the title sheet. The report meets several of the regulatory requirements; however, it is currently missing the identification of the agency responsible for carrying out each project listed. Transit projects are listed in a separate report which is posted online. At the on-site review, CPTA staff indicated that the report includes all federal funds obligated in the previous fiscal year. In addition to the report, a legend is provided which defines the terms included in the report.

At the on-site review, there was discussion about roles and responsibilities for developing the obligations report. YAMPO staff communicated the importance of collaboration with PennDOT as most of the data required for the report is owned and maintained by PennDOT. The PennDOT Central Office staff indicated efforts were underway to develop a new report which could be exported from MPMS. The report would include all federal requirements including agency responsible. In addition, PennDOT District 8 staff shared their intent to use new analytical data
tools to generate funding reports which could assist YAMPO’s efforts to develop the annual obligations report. The Review Team commends PennDOT’s efforts to identify an efficient and creative way to streamline the report process. The Review Team discussed that the report is intended for public consumption and shared ideas for how the report could be enhanced to make it easier for the public to understand and track how Federal funds are obligated.

4.8.3 Findings

**Commendations:**

- The Review Team commends PennDOT’s efforts to identify an efficient and creative way to streamline the obligations report process.

**Recommendations:**

- The Review Team recommends that YAMPO staff work with PennDOT Central Office and District 8 to develop a report that meets the requirements and provides explanatory detail for the public.

4.9 Safety Planning

4.9.1 Regulatory Basis

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

SAFETEA-LU established a core safety program called the Highway Safety Improvement Program (HSIP) (23 U.S.C. 148), which requires for states to have Strategic Highway Safety Plans (SHSPs). Prior to this, HSIP was a set-aside from the Surface Transportation Program (STP). One of the key requirements for the use of HSIP is that improvements must be supported by a focus area or strategy identified in the SHSP.

23 CFR 450.306 (d) requires the metropolitan transportation planning process to be consistent with the SHSP, support efforts to achieve safety performance measures, and integrate safety and security planning and review processes, plans, and programs, as appropriate.
PennDOT recently updated *Publication 638, District Highway Safety Guidance Manual*, that describes how to effectively plan and program HSIP funds. It also contains a requirement that HSIP expenditures must now be supported with *Highway Safety Manual (HSM)* analysis.

### 4.9.2 Current Status

The Review Team evaluated safety planning efforts underway in the York TMA region through the LRTP, TIP, and traffic and safety studies. The on-site review focused on several areas: Road Safety Audits (RSAs), HSIP project selection, and safety analysis tools.

**Road Safety Audits**

The York TMA has participated in six RSAs in their region over the past several years in conjunction with PennDOT District 8 and the District’s engineering consultant. The RSAs identified maintenance needs, potential low-cost safety improvements, and other more significant safety concerns on the roadways that were audited.

Both YAMPO and District staff are tracking recommendations from past RSAs using a spreadsheet to document RSA findings and track implementation. At the on-site review, the District indicated that they are meeting with municipalities to discuss past RSA findings and providing feedback to maintenance where issues can be addressed through Department-force or maintenance funds. In addition, the District is coordinating with traffic safety staff to consider past RSA findings as potential candidates for the 2021 TIP. YAMPO indicated one of the challenges with low-cost safety improvements that are identified in an RSA is that there are not funds to deliver the improvements. However, the District is working with YAMPO to explore the option of bundling low-cost safety improvements to deliver some of the smaller items identified in RSAs. At the on-site review, the District and YAMPO staff discussed the potential to add RSA results to the PennDOT Connects system and process to see if an issue was already identified on the roadway. The District indicated that they no longer plan to include an RSA line item on regional TIPs, instead they plan to identify project candidates that can be funded with HSIP. YAMPO supports this direction and plans to instead focus on conducting Intersection Safety Audits (ISAs) in the future.

**HSIP Project Selection**

As part of the TIP development process, YAMPO staff works with PennDOT District 8 to review the network screening system and forms to provide recommendations for improvements with
positive benefit-cost ratio to provide strong candidate projects. They also review all network screening data and provide potential locations for an RSA. This information is factored in to HSIP project selection. The YAMPO staff does not use the Highway Safety Manual (HSM) directly for safety analysis. Instead, the District and their consultant utilize the network screening tool and conduct Cost Benefit Analyses to assist in determining projects for HSIP project selection, low cost safety improvements and bundling. This internal process is in place, but YAMPO is working with PennDOT District 8 to develop external documentation for the TIP.

RSAs result in short- and long-term recommendations. Some of the short-term recommendations are completed by PennDOT maintenance forces, while the long-term recommendations are incorporated into larger projects that are placed on the TIP and funded with HSIP funds. As stated above, the District and YAMPO track the recommendations from RSAs and are exploring options to bundle low-cost safety improvements with HSIP funds.

**Safety Analysis**

YAMPO analyzes project locations five years before and after a project is implemented to see if the project truly improved safety for that area. The MPO looks for positive results from a long-term HSIP investment by analyzing conditions and plans to create and use public videos to share the impact on safety. The Review Team commends this effort to track, evaluate and document safety investments.

**4.9.3 Findings**

**Commendation:**

- The Review Team commends YAMPO for evaluating the impact of safety projects before and after construction. YAMPO and PennDOT District 8 also track RSA recommendations using a spreadsheet.

**4.10 Integrating Freight into the Transportation Planning Process**

**4.10.1 Regulatory Basis**

MAP-21 legislation specifically called for the need to address freight movement as part of the transportation planning process (Reference: MAP-21 § 1115-1118; 23 U.S.C. 134 and 23 CFR 450.306 - Metropolitan transportation planning). MAP-21 also included a number of freight
provisions to improve the condition and performance of the national network and support investment in freight-related surface transportation projects and programs. The legislation reflects that the LRTP process should provide for the consideration and implementation of projects, strategies, and services that address: i) increasing accessibility and mobility of people and freight, and ii) enhancing the integration and connectivity of the transportation system, across and between transportation modes, for people and freight.

The LRTP process for metropolitan areas should include freight planning, which can lead to a number of goals and strategies supporting and promoting multimodal transportation planning and project development in the metropolitan area. For example, a truck density map analysis can assist regional and local transportation decision makers in prioritizing transportation improvements in applicable corridors. System preservation improvements to urban arterials or local collector improvements could be selected to enhance the movement of goods throughout a region.

Freight issues and recommendations can also be incorporated throughout the LRTP. Freight does not need to be considered as a stand-alone topic. Freight is linked to the entire transportation network, and both the public and private sectors have divested much time in dealing with issues respecting economic development impacts, load bearing capacity, congestion and travel reliability, and limited funding to resolve congestion, safety and security.

4.10.2 Current Status

YAMPO is located in south central Pennsylvania, which is experiencing tremendous freight development and truck generated traffic due to the influence of the northeast economic markets, close proximity to port’s such as the Port of Baltimore and the Port of New York and New Jersey, and e-commerce.

As a result of the significant freight development (warehousing and ancillary businesses), the MPO established a Freight Workgroup for the 2045 YAMPO LRTP update. The workgroup included private and public-sector participants. The workgroup established objectives, performance measures, data sources, and created a Freight Network map identifying the National Multimodal Freight Network with First Class railroads and YAMPO Enhanced Freight Network with Critical Rural and Urban Freight Corridors and Third Class railroads. As of the last update, the freight workgroup selected two performance measures for target setting, truck parking and truck travel time reliability. An update should be provided to the freight workgroup on the final metrics and targets for the LRTP. In addition, the MPO should identify key freight
generators in the County to gain a perspective on the land uses suitable for freight development. At the on-site review, the Review Team discussed opportunities for YAMPO to continue to enhance freight planning efforts including participating in a regional truck parking summit with neighboring MPOs.

Major truck corridors in York County include Interstate 83 and US 30. The tables below reflect the history of truck percentages within those corridors. There was very little change for I-83, but US 30 did have some changes, most notably for the average and median trucks.

### 2015 Truck Percentages

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<td>Average from Truck Data</td>
<td>15.5%</td>
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<tr>
<td>Average from Driver Vehicle Miles Travelled</td>
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<td>13.9%</td>
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<tr>
<td>Median from Truck Data</td>
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### 2019 Truck Percentages

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<tr>
<td>Average from Driver Vehicle Miles Travelled</td>
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<tr>
<td>Median from Truck Data</td>
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<td>8.9%</td>
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</table>
2012 FAF4 Long Distance Truck Network Flow

![2012 FAF4 Long Distance Truck Network Flow](image1)

2045 FAF4 Long Distance Truck Network Flow

![2045 FAF4 Long Distance Truck Network Flow](image2)
4.10.3 Findings

**Commendation:**

- The Review Team commends the MPO for strengthening its freight and intermodal planning efforts in the LRTP and Congestion Management Process (CMP).

4.11 Congestion Management Process (CMP)

4.11.1 Regulatory Basis

23 CFR 450.320 states “that the transportation planning process in a Transportation Management Area shall address congestion management through a process that provides for safe and effective integrated management and operation of the multimodal transportation system, based on a cooperatively developed and implemented metropolitan-wide strategy, of new and existing transportation facilities eligible for funding under Title 23 U.S.C. and Title 49 U.S.C. Chapter 53 through the use of travel demand reduction and operational management strategies.”

Specifically, the section mandates, among other things, that a Congestion Management Process (CMP) contain the following elements:

- Methods to monitor and evaluate the performance of the transportation system;
- Definition of congestion management objectives and performance measures;
- Establishment of a coordinated program for data collection and system performance monitoring;
- Identification and evaluation of the anticipated performance and expected benefits of strategies;
- Identification of an implementation schedule and responsibilities for selected strategies; and

Transportation Management Areas are responsible for development and implementation of a CMP. As the 2010 Census resulted in the York urbanized area exceeding 200,000 in population, the designation as a TMA triggered the requirement to develop a CMP as part of the metropolitan planning process.
4.11.2 Current Status

The York MPO continues to utilize the CMP and an Annual Report on Congestion (ARC) to guide the overall goal of reducing and eliminating congestion in York County. Each process is discussed below with observation included.

The YAMPO 2013-2040 LRTP identified what percentage of TIP funding the YAMPO should dedicate to congestion-mitigating projects through the year 2040, but the LRTP did not identify projects or locations. The Review Team encourages the MPO to continue this best practice in the upcoming LRTP to identify the percentage of transportation funding dedicated to the mitigation of congested corridors in the urbanized region.

As performance-based planning and programming is incorporated in the LRTP process, the Review Team encourages the MPO to continue to strengthen collaboration efforts with PennDOT staff to identify and mitigate congested corridors along interstate and NHS corridors. This includes identifying truck bottleneck locations and high truck ADTT corridors in the CMP, and non-recurring causes of congestion. The Review Team commends the MPO for its regional collaboration efforts with PennDOT and neighboring MPOs to improve safety and CMP programs in the central Pennsylvania region.

The ARC is the other document used to mitigate congestion in the region. The CMP establishes a process to gather and analyze data to determine which transportation elements are experiencing congested conditions. This is a vastly different approach from what many MPOs are doing nationally pertaining to identifying strategies for selected congested corridors. As stated by the MPO, the most significant aspect of the CMP update was the shift in perspective from travel corridors to individual intersections. Subsequently, the results of the CMP are presented in the ARC.
2017 Highway Performance Management System (HPMS) Traffic Volumes

Traffic Volumes Exceeding Capacity 2012 vs. 2045
4.11.3 Findings

Commendation:

- The Review Team commends the MPO for its regional collaboration efforts with PennDOT and neighboring MPOs to improve safety and CMP programs along major corridors in the central Pennsylvania region. The York MPO is a leader in developing and implementing asset and congestion analysis of the transportation system.

5.0 CONCLUSION AND RECOMMENDATIONS

The current review found that the metropolitan transportation planning process conducted in the York urbanized area meets the Federal planning requirements.

As a result of this review, FHWA and FTA are certifying the transportation planning process which is conducted by PennDOT, YAMPO and CPTA. There are recommendations in this Report that warrant close attention and follow-up, as well as areas where the TMA is performing very well that are to be commended.
APPENDIX A – PARTICIPANTS

The following participants attended Day 1 of the on-site review on Tuesday, June 25:

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</tbody>
</table>
The following participants attended Day 2 of the on-site review on Wednesday, June 26:

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<thead>
<tr>
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<tr>
<td>Jesse King</td>
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<td>Michael Sherman</td>
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<td>717-221-3916</td>
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APPENDIX B – PUBLIC COMMENTS

The Review Team held two open public meeting sessions to discuss the transportation planning process in York County. The meeting sessions were held on:

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<th>Open Public Meeting - Session 1</th>
<th>Open Public Meeting - Session 2*</th>
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<tbody>
<tr>
<td><strong>Time:</strong> 5:30 p.m.</td>
<td><strong>Time:</strong> 9:00 a.m. – 11:30 a.m.</td>
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<tr>
<td><strong>Date:</strong> Wednesday, June 26, 2019</td>
<td><strong>Date:</strong> Thursday, June 27, 2019</td>
</tr>
<tr>
<td><strong>Place:</strong> York City Hall Chambers 101 South George Street York, PA 17401</td>
<td><strong>Place:</strong> York County Administrative Center 28 E Market Street York, PA 17401</td>
</tr>
</tbody>
</table>

* Held in conjunction with YAMPO Coordinating Committee Meeting

The sessions provided an opportunity for the public, local officials, and stakeholders to share their views on the transportation planning process. The attendee list is provided below.

Open Public Meeting - Session 1 (Wednesday, June 26)

No members of the public attended the public meeting on Wednesday, June 26 and the session was adjourned. The following participants attended the Open Public Meeting – Session 1:

<table>
<thead>
<tr>
<th>No.</th>
<th>Name</th>
<th>Organization</th>
<th>Phone</th>
<th>Email</th>
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<tbody>
<tr>
<td>23</td>
<td>Moriah Smith</td>
<td>FHWA</td>
<td>717-221-4180</td>
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<td>Laura Keeley</td>
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<td>Jen Crabbe</td>
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<td>29</td>
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<tr>
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* York County Public Meeting - June 26, 2019

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Open Public Meeting - Session 2 (Thursday, June 27)

- Welcome and Certification Review Presentation
  At 9:00 a.m., Michael Sherman, FHWA, welcomed public meeting participants and explained the purpose and components of a joint FTA/FHWA TMA Certification Review. Mr. Sherman provided an overview of the certification process and explained the basics of the MPO transportation planning process. He stated that the Review Team was present at the meeting to get feedback about the York TMA from the public, and that the Team’s findings and recommendations could be influenced by their comments. He invited attendees to share issues, concerns, accolades, questions, and comments.

- Public Comments: No public comments were received and the session was adjourned.

The following participants attended the Open Public Meeting – session 2:

<table>
<thead>
<tr>
<th>NAME</th>
<th>INITIALS</th>
<th>REPRESENTING</th>
<th>E-MAIL ADDRESS (if changed from last meeting)</th>
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</thead>
<tbody>
<tr>
<td>Kent Jefferson</td>
<td>KJN</td>
<td>Chanceford Twp</td>
<td><a href="mailto:Chanceford_twp@gmail.com">Chanceford_twp@gmail.com</a></td>
</tr>
<tr>
<td>Leah Gaynor</td>
<td>LG</td>
<td>Chanceford Twp</td>
<td><a href="mailto:chanceford_twp@gmail.com">chanceford_twp@gmail.com</a></td>
</tr>
<tr>
<td>Tasha Clayton</td>
<td>TCW</td>
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<td>James Frueh</td>
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<td>CS Planning, Inc.</td>
<td><a href="mailto:jfrueh@csPlanning.com">jfrueh@csPlanning.com</a></td>
</tr>
<tr>
<td>June Naylor</td>
<td>JN</td>
<td>PennDOT</td>
<td><a href="mailto:jnaylor@penndot.gov">jnaylor@penndot.gov</a></td>
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<tr>
<td>Gene L. Waddington</td>
<td>GLW</td>
<td>Senator Kristin Phillips</td>
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<tr>
<td>Mark Henise</td>
<td>MH</td>
<td>ELA Group</td>
<td><a href="mailto:minhise@ela-group.com">minhise@ela-group.com</a></td>
</tr>
<tr>
<td>C. Weiler</td>
<td>CW</td>
<td>York County</td>
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<tr>
<td>Joseph Yee</td>
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<tr>
<td>Keena Mundt</td>
<td>KM</td>
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<td><a href="mailto:kmundt@york.gov">kmundt@york.gov</a></td>
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<tr>
<td>Steve Jones</td>
<td>SJ</td>
<td>Rous County</td>
<td><a href="mailto:js@rouscounty.org">js@rouscounty.org</a></td>
</tr>
<tr>
<td>Teresa Bernard</td>
<td>TRB</td>
<td>York Daily Record</td>
<td><a href="mailto:theresa@ydr.com">theresa@ydr.com</a></td>
</tr>
<tr>
<td>Michael Sherman</td>
<td>MRS</td>
<td>FHWA</td>
<td><a href="mailto:michael_sherman@fhwa.gov">michael_sherman@fhwa.gov</a></td>
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<tr>
<td>Anthony E. Davis</td>
<td>AED</td>
<td>PennDot</td>
<td><a href="mailto:aedavis@penndot.gov">aedavis@penndot.gov</a></td>
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<tr>
<td>Ronnie &amp; Sandy</td>
<td>RS</td>
<td>PennDOT</td>
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<tr>
<td>Kevin Est</td>
<td>KE</td>
<td>Rous County</td>
<td><a href="mailto:kevin@rouscounty.org">kevin@rouscounty.org</a></td>
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<tr>
<td>Matt Seger</td>
<td>MS</td>
<td>Commissioner</td>
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<tr>
<td>Laura Phillips</td>
<td>LP</td>
<td>FHWA - LA Division</td>
<td><a href="mailto:laura.phillips@dot.gov">laura.phillips@dot.gov</a></td>
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</table>
The following participants attended the Open Public Meeting – session 2:

**YORK COUNTY MPO – COORDINATING COMMITTEE**
**June 27, 2019**

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<tr>
<th>NAME</th>
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<td>Walker, Nathan</td>
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<td>PennDOT – District 8-0 Office</td>
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<tr>
<td>Chris L.</td>
<td>C</td>
<td>VCPC</td>
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APPENDIX C – STATUS OF FINDINGS FROM LAST REVIEW

One of the priorities of each Certification Review is assessing how well the TMA has addressed Recommendations from the previous review. This section summarizes progress since the last review in 2016.

**Recommendation #1:** The Review Team recommends that YAMPO include a data collection and analysis of the conditions and operational functions of the locally-owned roadways on the Federal-aid system as part of the next LRTP Update process. A map highlighting the locally-owned roadways on the Federal-aid system should be incorporated into the LRTP Update. In addition, YAMPO should expand its existing collaborative relationship with local municipalities in order to educate and advocate for the conditions and needs of the locally-owned Federal-aid system. In York County, this system is comprised of approximately 86.8 local miles or 11.7% of Federal-aid system in York County.

**Disposition:** The YAMPO began updating their LRTP well ahead of the 2021 deadline. In effort to address the recommendation, YAMPO developed several workgroups to focus on components of the LRTP which include the following areas: freight, environment, safety and security, asset management, and people. Several local municipalities are participating in the YAMPO’s efforts in updating the LRTP. The MPO has also enhanced its outreach to municipalities with locally-owned roadways. YAMPO has mapped all locally-owned Federal-aid routes and notified municipal contacts of the availability of federal funds for transportation projects.

**Recommendation #2:** The Review Team recommends that YAMPO continue to stay up-to-date on the USDOT Performance Measures and Performance-Based Planning Processes (PBPP), and be prepared to implement those regulations and adapt the MPO’s processes, if and when necessary. YAMPO is well poised for developing goals and performance targets based on the comprehensive data and analysis in the LRTP, and in future LRTP updates, should consider documenting the existing conditions, trends, and goals in order to reevaluate their transportation investment decisions and project selection processes.
**Disposition:** The YAMPO adopted PennDOT’s statewide performance targets. The Review Team recommended that staff continue to work with PennDOT to incorporate performance based planning into the upcoming TIP and LRTP updates.

**Recommendation #3:** The MPO should evaluate ways to improve data gathering to support long range transportation planning and the identification of resources and potential impacts through coordination with local agencies. One opportunity is through the development of Local Agency Coordination Meetings.

**Disposition:** YAMPO has vastly improved its efforts by obtaining TomTom, INRIX, and CDART data to incorporate it into the YAMPO’s planning processes. As part of YAMPO’s LRTP update coordination efforts, the MPO staff is translating technical data for the workgroup members to review for further consideration. In addition, the MPO has developed an environmental workgroup with resource agency contacts to discuss the LRTP priorities and potential projects.

**Recommendation #4:** The MPO should work in consultation with FHWA and PennDOT, so that it can meet the requirement for an annual listing of obligated projects for FFY 2016. The annual listing should be more “public user friendly” in order to meet the spirit and intent of the requirement and should be made available for public access via social media applications or world-wide web.

**Disposition:** The Review Team carried forward this recommendation to improve the annual listing of obligated projects. The Review Team recommends YAMPO staff work closely with PennDOT to develop and provide a more public-friendly and complete listing. PennDOT is undergoing MPMS updates and software changes from Endeca to Power BI and may be able to provide resources for the listing once the transition is complete.

**Recommendation #5:** YAMPO should address regional bicycle and pedestrian issues and challenges through the development of a stand-alone comprehensive regional bicycle and pedestrian plan.

**Disposition:** The YAMPO adopted the *York County Bicycle and Pedestrian Connectivity and Safety Inventory* in 2015. For bicycle and pedestrian projects, the MPO staff utilizes a quarter-mile buffer based on the fixed route transit system. The Review Team recommended the YAMPO consider other data sources and traffic generators, such as
schools and parks, in the YAMPO’s approach to bicycle and pedestrian projects as part of the plan. In effort to improve the YAMPO’s plan, PennDOT District 8 is willing to provide crash data.

**Recommendation #6:** The Review Team recommends that MPO staff vigorously continue work on further enhancing the Congestion Management Process (CMP) as an important analytical tool. As strategies are deemed feasible for congestion mitigation in certain corridors and “hotspots,” tracking their progress towards acceptance and implementation will be important in gauging the overall effectiveness of the CMP as an integral part of the overall metropolitan planning process. Also, as the MAP-21 national “congestion” goal area and associated rulemaking procedures continue, CMP efforts will no doubt support future performance-based planning and programming requirements in this area.

**Disposition:** The YAMPO provides a structured outline in the CMP which includes the methodology resulting in the development of their *Annual Report on Congestion* (ARC). The ARC shifted its primary focus from corridors to improve intersections through York County. With the shift towards Transportation Performance Management (TPM), YAMPO wants to build consistency by using TomTom and INRIX data to gather data for travel time reliability (Performance Measure 3 (PM3)).

**Recommendation #7:** The Review Team recommends that the MPO develop a method for identifying bottleneck locations that cause operational and safety problems in the future, as well as proposed countermeasures to address these bottlenecks. It is believed that the mitigation of bottlenecks can provide much more cost-effective solutions than traditional planning processes.

**Disposition:** The MPO established a Freight Workgroup for the 2045 YAMPO LRTP update. The workgroup included private and public-sector participants. The workgroup established objectives, performance measures, data sources, and created a Freight Network map identifying the National Multimodal Freight Network with First Class railroads and YAMPO Enhanced Freight Network with Critical Rural and Urban Freight Corridors and Third Class railroads. As of the last update, the freight workgroup had selected two performance measures for target setting, truck parking and truck travel time reliability.
Recommendation #8: The Review Team recommends that due to the increased national and regional focus on freight planning that the MPO should increase its participation in regional or local public and/or private sector freight forums.

Disposition: This recommendation is addressed in the comment above (see #7).

Recommendation #9: The Review Team recommends that the MPO take a more comprehensive look at freight congestion via the CMP, land use development, and the intermodal (especially rail) transportation network and connections as the MPO moves forward with updating the LRTP.

Disposition: This recommendation is addressed in the comment above (see #7).

Recommendation #10: The Review Team recommends that YAMPO consider inviting FHWA to participate in future Road Safety Audits (RSAs). The FHWA has experience and expertise in safety and traffic engineering as well as in transportation planning that could further strengthen YAMPO’s multidisciplinary approach to conducting these valuable reports.

Disposition: FHWA was invited to participate in safety planning efforts including the RSA that was completed in 2017.

Recommendation #11: The Review Team recommends that YAMPO conduct a comprehensive review of its existing CMAQ process in order to assess whether the intended benefits of the CMAQ Program to meet the requirements and advance the goals of the Clean Air Act are being used in the most cost-effective manner. At a minimum, the YAMPO CMAQ selection process should analyze potential candidates to determine the expected emission reduction benefits for each project and give high priority to the most cost-effective projects. In addition, any CMAQ selection process should also be transparent and consider other ancillary selection factors such as congestion relief, greenhouse gas reductions, safety, system preservation, access to opportunity, sustainable development, freight, reduced SOV reliance, multi-modal benefits, and other local factors as appropriate.

Disposition: The YAMPO has developed and utilizes CMAQ project selection criteria. However, due to no capacity projects being added to the TIP, the YAMPO did not upload the CMAQ project selection criteria to the YAMPO’s website.
Recommendation #12: The Review Team recommends that YAMPO develop, adopt, and distribute a Title VI Policy Statement internally and externally. In future updates to the various documents that the MPO makes available to the public, the MPO should consider including the Title VI Policy Statement as well as a Title VI contact person and contact information (should they have a complaint.)

Disposition: YAMPO adopted and posted a Title VI Policy Statement and complaint procedure. Please see the Civil Rights section for more details on the current status and recommendations.

Recommendation #13: The Review Team recommends YAMPO, in consultation with PennDOT’s Bureau of Economic Opportunity (BEO), revise its Title VI Complaint Process to distinguish between the formal complaint and a grievance (informal) complaint process. Revisions should include the following: ensuring that complainants are aware of their right to file a formal complaint with the concerned Operating Administration at any time during the informal process; the steps to notify PennDOT that the MPO received an informal complaint and its resolution; and the specific timelines for resolving the informal complaint.

Disposition: YAMPO adopted and posted a Title VI Policy Statement and complaint procedure. Please see the Civil Rights section for more details on the current status and recommendations.

Recommendation #14: The Review Team recommends that YAMPO, in consultation with PennDOT BEO, develop a Limited English Proficiency (LEP) Plan consistent with DOT’s LEP guidance.

Disposition: The YAMPO adopted a LEP Plan in consultation with BEO. Please see the Civil Rights section for more details on the current status.

Recommendation #15: The Review Team recommends that the MPO expand its outreach efforts to increase Environmental Justice (EJ) population participation in the planning process as well as consider expanding its EJ analysis beyond transit and access to jobs to include other interrelated social and economic effects, e.g. access to public services and effects of transportation decisions within EJ communities.
Disposition: The YAMPO led efforts to study effective EJ outreach and analysis techniques through the South Central PA Unified EJ Process. This was an essential piece in the development of the FHWA/FTA EJ Core Elements approach. YAMPO is currently serving on an EJ workgroup to support statewide implementation of the EJ Core Elements as part of the 2021 TIP/STIP update.

Recommendation #16: The Review Team recommends that YAMPO consider providing a Text Telephone (TTY) number in all notices to facilitate communication with individuals with hearing disabilities, as well as to state specifically which documents are available in alternative formats.

Disposition: The TTY recommendation is addressed in YAMPO’s PPP. A statement is added at the end of meeting agendas and notices that advises of the availability of TTY services. Further, a statement is included at beginning of the PPP document that advises that publications and documents can be made available in alternative languages and formats.

Recommendation #17: The Review Team recommends that YAMPO consider including language in its representation letter that also encourages consideration of individuals that represent the interest of individuals with disabilities and low-income populations.

Disposition: This recommendation was not specifically addressed during review. This recommendation was included as an outreach enhancement. However, discussion about outreach to advocacy groups in the development of the PPP was indicative of a good faith effort to include traditionally underrepresented populations, e.g., Community Progress Council and the York Association for the Deaf, which is sufficient.

Recommendation #18: The Review Team recommends that the Public Participation Plan be updated to reflect current statutory citations such as MAP-21, the release of 2010 U.S. Census demographic data, and committing to document evaluation timeframes.

Disposition: The PPP was last updated in 2017 and includes current 23 CFR 450.316 requirements. Please see the Public Participation section for the current status and recommendations.
APPENDIX D – LIST OF ACRONYMS

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<tr>
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<th>Definition</th>
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<td>ADA</td>
<td>Americans with Disabilities Act</td>
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<td>AMPO</td>
<td>Association of Metropolitan Planning Organizations</td>
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<td>AQ</td>
<td>Air Quality</td>
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<td>Clean Air Act</td>
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<td>CDART</td>
<td>Crash Data Analysis and Retrieval Tool</td>
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<td>CFR</td>
<td>Code of Federal Regulations</td>
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<td>CMP</td>
<td>Congestion Management Process</td>
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PPP: Public Participation Plan  
ROP: Regional Operations Plan  
RSA: Road Safety Audit  
SAFETEA-LU: Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users  
SHSP: Strategic Highway Safety Plan  
STC: State Transportation Commission  
STIP: Statewide Transportation Improvement Program  
TAM: Transit Asset Management  
TAMP: Transportation Asset Management Plan  
TDM: Travel Demand Management  
TDP: Transit Development Plan  
TIP: Transportation Improvement Program  
TMA: Transportation Management Area  
TPM: Transportation Performance Measures  
TSMO: Transportation Systems Management and Operations  
TTAC: Transportation Technical Advisory Committee  
TYP: Twelve Year Plan  
UPWP: Unified Planning Work Program  
USDOT: United States Department of Transportation