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March 24, 2016

The Honorable Susan Haynie, Chair
Palm Beach Metropolitan Planning Organization
2300 North Jog Road, 4th Floor
West Palm Beach, FL 33411-2749

Dear Mayor Haynie,

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) are in receipt of the Palm Beach Metropolitan Planning Organization's (MPO) letter, dated March 3, 2016 which summarizes the actions taken by the MPO to satisfy the corrective actions of the 2015 Miami Urbanized Area Transportation Management Area (TMA) Certification Report. To address those findings, the MPO proposed an amendment to the *Directions 2040* Long Range Transportation Plan (LRTP) and the MPO Board subsequently adopted it on February 18, 2016. The corrective action findings and how they were addressed by the MPO in the adopted LRTP amendment are described below:

- 1. Linking Planning and NEPA – Mitigation Strategies.** In accordance with 23 CFR 450.322 (f)(7) "A metropolitan transportation plan shall include, a discussion of types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the metropolitan transportation plan. The discussion may focus on policies, programs, or strategies, rather than at the project level. The discussion shall be developed in consultation with Federal, State, and Tribal land management, wildlife, and regulatory agencies. The MPO may establish reasonable timeframes for performing this consultation." The MPO needs to modify the *Directions 2040* Long Range Transportation Plan to include a narrative regarding potential environmental mitigation activities that have been developed in consultation with Regulatory Agencies. **This modification needs to be completed by or before February 28, 2016.**

The Palm Beach MPO amended the *Directions 2040* LRTP to add narrative to describe the MPO's analysis of potential environmental impacts and environmental mitigation strategies and policies followed during their LRTP development process. This amendment also added a discussion describing the MPO's work with partner regulatory agencies and included a map and a narrative describing the environmentally sensitive areas within the County that were considered during the plan development as well.

- 2. Long Range Transportation Plan: Project Phases.** In accordance with 23 CFR 420.322 (f) (10) the metropolitan transportation plan shall, at a minimum include, “A financial plan that demonstrates how the adopted transportation plan can be implemented.” During the review of the MPO’s *Directions 2040* LRTP the Federal Review Team observed that the MPO’s LRTP Cost Feasible table does not include project phase information for projects identified in the Cost Affordable Plan for the first 5 years of the Plan. In the outer years the projects are footnoted that the costs identified are for all project phases. It was not clear if all projects included were indeed fully funded for all phases. As stated in the November 2012 letter on LRTP Expectations, revenues to support the costs associated with the work/phase must be demonstrated. For a project to be included in the cost feasible plan, an estimate of the cost and source of funding for each phase of the project being funded (including the Project Development and Environment (PD&E) phase) must be included. The phases to be shown in LRTPs include Preliminary Engineering, ROW and Construction (FHWA and FTA support the option of combining PD&E and Design phases into “Preliminary Engineering”). The MPO needs to modify the *Directions 2040* Long Range Transportation Plan’s Cost Feasible Plan tables to include this project detail. **The modification to the Long Range Transportation Plan needs to be completed by February 28, 2016.**

The MPO amended the *Directions 2040* LRTP to identify the phases being funded for all projects in the Cost Feasible Plan.

- 3. Long Range Transportation Plan-Financial Plan/Fiscal Constraint.** The *Directions 2040* Plan provides the often complex financial information in an easy to read format and infographics for the public and its partners. However, while a comparison of the Plan revenue sources and Cost Feasible Plan was included to demonstrate the fiscal constraint of the Plan, it did not include the first 5 years of the Plan and therefore does not demonstrate full fiscal constraint of the Plan. Cost feasibility was shown only on the last 20 years of the Plan (2020-2040). In accordance with 23 CFR 450 .322(a), and discussed in the November 2012 FHWA/FTA LRTP development expectations letter, the LRTP must show projects and funding for the entire time period covered by the LRTP, from the base year to the horizon year. Because this information is missing from the financial infographics and tables, fiscal constraint of the full plan could not be determined. **Revisions to the *Directions 2040* LRTP Plan must be made to include this information to clearly demonstrate fiscal constraint for the entire Plan update by February 28, 2016.**

The amendment to the *Directions 2040* LRTP updated the financial graphics and charts throughout the document to clearly include and identify the financial sources and anticipated costs for the full plan, from the base year to the horizon year as requested. Fiscal constraint for the entire plan has been demonstrated with these changes.

Upon review of the adopted amendment, the FHWA and FTA have determined that the changes made to the *Directions 2040* LRTP successfully addressed the requirements of the 2015 Miami Urbanized Area TMA Certification Corrective Actions for the Palm Beach MPO. Therefore, FHWA and FTA jointly certify that the transportation planning process of the Miami Urbanized

Area TMA, comprised in part by the Palm Beach MPO, substantially meets the federal planning requirements in 23 CFR 450 Subpart C. This certification remains in effect until August 2019.

If you have any questions regarding the review process, please contact Ms. Stacie E. Blizzard at (850) 553-2223 or by email at Stacie.Blizzard@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen M. Brunelle". The signature is fluid and cursive, with a large initial "K" and "B".

For: James Christian, P.E.
Division Administrator
Federal Highway Administration

cc: Mr. Nick Uhren, Palm Beach MPO
Mr. Keith Melton, FTA (Region 4)
Ms. Karen Brunelle, FHWA, Florida
Ms. LeeAnn Jacobs, FHWA, Florida
Mr. Steve Braun, FDOT (District 4)
Ms. Arlene Tanis, FDOT (District 4)
Mr. Sean Santalla, FDOT (MS-28)
Ms. Yvonne Arens, FDOT (MS-28)
Mr. Carl Mikyska, MPOAC (MS-28B)