



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



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Transportation Management Area Planning Certification Review



OKI Regional Council of Governments Transportation Management Area

April 22, 2025

Summary Report



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1.0 EXECUTIVE SUMMARY

On October 29, 2024, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted the certification review of the transportation planning process for the OKI 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

A prior Federal Review Team conducted a Certification Review of the Cincinnati (OKI) urbanized area in 2021. Previous Certification Review findings and their disposition are provided in Appendix B and summarized as follows.

OKI received ten (10) Commendations to highlight noteworthy practices that the OKI MPO is doing well in the transportation planning process in the following review areas: Two (2) for Transportation Improvement Plan (TIP); Two (2) for Intelligent Transportation Systems (ITS); Three (3) for Freight Planning; One (1) for Travel Demand Forecasting; One (1) for Security and Resiliency; and one (1) for Public Involvement.

Finding	Action	Corrective Actions/ Recommendations	Disposition
Transit Planning: The Review Team finds that transit is integrated into OKI's transportation planning process. During the Certification Review, it was noted by FTA and one of the transit providers that Clermont County has demonstrated repeatedly that it struggles to utilize its allocated formula funding before the funds are set to lapse. This has presented situations where FTA funds have been awarded to other transit operators so that federal funding is utilized. It highlights the issue that funding allocations do not reflect current need by all operators. Also, several operators have a secondary agreement to re-allocate money back to SORTA after the MPO sends an allocation letter to FTA identifying the amounts each agency is to receive for the fiscal year. OKI confirmed that they do not receive notification of the re-allocation of dollars. FTA has made it known that the MPO should provide an allocation letter that accurately reflects what each agency will truly have available for FTA award and what will be supported by the TIP. FTA also noted that there have been situations where funds allocated by OKI and ODOT and awarded in FTA grants have not been fully utilized for the purposes of the award.	Recommendation	It is recommended that OKI work with FTA, ODOT and the transit operators to identify a process to ensure that all parties: 1) have an accurate accounting of available and lapsing transit funding at the beginning of each federal fiscal year; and 2) document the completion status of projects awarded with federal funds from both FTA and FHWA on an annual basis. Having a current snapshot in these areas should influence how formula funds are allocated to better reflect the near-term capital and operating needs of transit operators and impact "history of performance" considerations in the OKI project selection process with respect to funds that are transferred from FHWA to FTA. Consideration should be given to incorporate this process into the one used to gather information for the annual listing of obligated projects.	Progress since the last Federal Certification Review in 2021. A new recommendation (Recommendation 2 - Transit - Reduce Lapsed Fund Risk) in this review cycle has been issued to assist support continued progress.



Agreements: After becoming a Direct Recipient, the City of Cincinnati is now eligible to receive a portion of the Section 5307 formula funding allocated to the UZA. At the time of the Certification Review, the City of Cincinnati had not been incorporated into the City's planning process or documents as a transit operator. As of this writing, the OKI had communicated with the City for the purposes of signing a planning agreement. Going forward, it will become imperative for the City to work closely with OKI to demonstrate that the City has financial capacity, specifically, local funding to maintain and operate the Streetcar and match any potential federal funding that may be programmed in the TIP and MTP.	Recommendation	It is recommended that OKI update its planning agreement(s) with Ohio public transportation agencies to include the City of Cincinnati as a public transportation operator.	Completed
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1.2 Summary of Current Findings

The current review found that the metropolitan transportation planning process conducted in the Cincinnati (OKI) urbanized area **MEETS** with Federal planning requirements.

As a result of this review, FHWA and FTA are certifying the transportation planning process conducted by Ohio Department of Transportation (ODOT), Kentucky Transportation Cabinet (KYTC), Indiana Department of Transportation (INDOT), OKI Metropolitan Planning Organization (MPO) and the regional transit authorities subject to addressing review findings. There are 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.

Review Area	Finding	Action	Corrective Actions/ Recommendations/ Commendations	Resolution Due Date
Metropolitan Planning Area Boundaries 23 U.S.C. 134(e) 23 CFR 450.312(a)	The MPO meets federal requirements.	N/A	N/A	N/A
MPO Structure and Agreements 23 U.S.C. 134(d) 23 CFR 450.314(a)	The MPO meets federal requirements.	N/A	N/A	N/A
Unified Planning Work Program 23 CFR 450.308	The MPO meets federal requirements.	N/A	N/A	N/A
Metropolitan Transportation Plan 23 U.S.C. 134(c),(h)&(i) 23 CFR 450.324	The MPO meets federal requirements.	N/A	N/A	N/A



Transit Planning 49 U.S.C. 5303 23 U.S.C. 134 23 CFR 450.314	The MPO meets federal requirements.	Commendation #6: Regional Transit Collaborative. Recommendation #2: Reduce Lapsed Fund Risk Recommendation #3: Link Transportation Planning to Transportation Programming Recommendation #4: Share Transit Performance Information.	Commendation #6 Recommendation #2, #3, #4	Recommendation #2: Federal FY2026 or before. Recommendation #3: Next TIP update. Recommendation #4: Federal FY2025.
Transportation Improvement Program & Self-Certification 23 U.S.C. 134(c)(h)& (j) 23 CFR 450.326	The MPO meets federal requirements.	N/A	N/A	N/A
Public Participation 23 U.S.C. 134(i)(6) 23 CFR 450.316 & 450.326(b)	The MPO meets federal requirements.	Commendation #3: Website Improvements. Commendation #4: GIS Upgrades Recommendation #1: Implement Virtual Meeting Options.	Commendation #3, #4 Recommendation #1	Recommendation #1: FY2026.
Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324, Age Discrimination Act, Sec. 504 Rehabilitation Act, Americans with Disabilities Act	The MPO meets federal requirements.	N/A	N/A	N/A
Consultation and Coordination 23 U.S.C. 134(g) & (i) 23 CFR 450.316, 23 CFR 450.324(g)	The MPO meets federal requirements.	N/A	N/A	N/A
Freight 23 U.S.C. 134(h) 23 CFR 450.306	The MPO meets federal requirements.	Commendation #5: Freight Planning.	Commendation #5	N/A



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 MPO meets federal requirements.	N/A	N/A	N/A
Integration of Land Use and Transportation 23 U.S.C. 134(g)(3) 23 U.S.C. 134 (h)(1)(E) 23 CFR 450.306(a)(5)	The MPO meets federal requirements.	Commendation #1: Housing Technology in Transportation Planning.	Commendation #1	N/A
Air Quality Clean Air Act 42 U.S.C. 7401 40 CFR Part 93 23 CFR 450.324(m)	The MPO meets federal requirements.	N/A	N/A	N/A
Congestion Management Process / Management and Operations 23 U.S.C. 134(k)(3) 23 CFR 450.322	The MPO meets federal requirements.	Commendation #2: CMP & ITS	Commendation #2	N/A

Details of the certification 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.

OKI is the designated MPO for the Cincinnati urbanized area. ODOT is the responsible State agency and SORTA, TANK, BCRTA, MTS, CTC, WCTS, plus the City of Cincinnati are the responsible public transportation operators. Current membership of the OKI MPO consists of elected officials and citizens from the political jurisdictions in the Cincinnati region. The study area includes all of Hamilton, Butler, Warren, Clermont counties in Ohio, Boone, Campbell, Kenton counties in Kentucky and Dearborn County Indiana, with the City of Cincinnati 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 certification review is also an opportunity to provide assistance on new programs and to enhance the ability of the metropolitan transportation planning process to provide decision makers with the knowledge they need to make well-informed capital and operating investment decisions.

3.0 SCOPE AND METHODOLOGY

3.1 Review Process

A prior Federal Review Team conducted a Certification Review of the Cincinnati (OKI) urbanized area in 2021. Previous Certification Review findings and their disposition are provided in Section 1.0 and Appendix B. This report details the 2025 review, which consisted of a formal site visit conducted in October of 2024, and a public involvement opportunity, conducted in November of 2024.

Participants in the review included representatives of FHWA, FTA, Ohio DOT, Kentucky Transportation Cabinet, City of Cincinnati Streetcar, SORTA/Metro, and OKI MPO staff. A full list of participants is included in Appendix A.

A desk review 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.



Authorized Risk-Based Approach

Based on the regular and recent stewardship and oversight activity in OKI's TIP, MTP, UPWP and other transportation planning products; the fact that OKI is a mature, well-established, and successful MPO with no recent history of corrective actions with positive previous findings; and due to a high volume of discretionary grants awarded in Ohio and other competing transportation discipline stewardship and oversight priorities, FHWA-Ohio Division as the lead for the TMA Certification was instructed to conduct a Risked-Based Approach to this cycle of OKI's TMA Certification.

The objective of a Certification Review is to determine how the TMA planning partners are addressing Federal law and regulations, including assessing progress on prior Federal actions. In conducting a risk-based review, the Federal Review Team assesses the risks involved with meeting this objective and focuses on the topics that will have the greatest impact.

A risk-based review focuses on the high-risk areas, both threats and opportunities, and does not attempt to cover every planning topic. It is not required, nor practical to attempt to fully cover every planning topic as part of the on-site review, however the standard subject areas were reviewed and assessed during the desk review.

Background information, current status, key findings, and recommendations are summarized in the body of the report for the following subject areas selected by FHWA and FTA staff for on-site review:

Risk-Based On-Site Review Subjects

- Status of the Recommendations from the Previous Certification Review
- Metropolitan Planning Area Boundaries
- MPO Structure and Agreements
- Transit Planning
- Development of Key Planning Products (MTP, TIP, UPWP, PPP)
- Public Participation and Interagency Consultation
- Title VI & ADA
- Performance-based Planning and Programming
- Congestion Management Process (CMP) & ITS
- Active Transportation
- Financial Planning
- Air Quality



In addition, the MPO also provided presentation of other subject status during the site-visit such as:

- Project Prioritization Process
- Consideration of Housing Patterns
- Socioeconomic Forecasting
- Transportation Modeling
- Apps, Maps, Data & Dashboards
- Safety
- Freight and Advanced Air Mobility

Other Desk Review Subjects

- Freight Planning
- Travel Demand Forecasting
- Transportation Safety
- List of Obligated Projects
- Transportation Security Planning
- Nonmotorized Planning/Livability
- Integration of Land Use and Transportation

3.2 Documents Reviewed

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

- FY2025 OKI UPWP
- 2024 Update to 2050 MTP & Project Prioritization Process
- 2024-2027 TIP & Amendments
- 2024 List of Obligated Projects
- 2024 OKI TIP Self Certification
- Ohio Metropolitan Planning MOA, 2024
- Kentucky Planning MOA, 2018
- Indiana Metropolitan Planning Agreement MOA, 2023
- OKI 2024 Performance and Expenditure Report
- 2022 OKI Public Participation Plan
- 2023 Freight Plan
- 2022 ITS Architecture and Strategic Plan
- 2022 OKI Complete Streets Policy
- OKI Pedestrian Plan
- Regional Bicycle Plan
- OKI Title VI Program Plan 2025-2028
- OKI Title II-ADA Self-Evaluation & Transition Plan 2022
- 2021 Federal Funding Agreement



4.0 PROGRAM REVIEW

4.1 Metropolitan Planning Area Boundaries

4.1.1 Regulatory Basis

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

4.1.2 Current Status: OKI operates under a variety of agreements with the three states in its region documenting the responsibilities of all agencies to carry out the 3-C transportation planning process. In 2020, Dearborn County, IN was removed from the urban area, but remains a member of OKI and the MPA where INDOT provides SPR funds, and OKI provides planning services to Dearborn County. No changes to the MPA are expected within a 20-year forecast.

MPO Official Name: OKI Regional Council of Governments.

MPO Area Boundaries: 3 states (OH-KY-IN), 8 counties (Hamilton, Butler, Warren, Clermont, Campbell, Kenton, Boone, and Dearborn), and nearly 200 communities.

Population Served: 2.12 million.

4.1.3 Findings: The FHWA/FTA Federal Review Team finds that the Metropolitan Planning Area Boundaries meet the requirements of 23 U.S.C. 134(e) and 23 CFR 450.312(a).

4.2 MPO Structure and Agreements

4.2.1 Regulatory Basis

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

4.2.2 Current Status: OKI operates under a variety of agreements with the three states in its region documenting the responsibilities of all agencies to carry out the 3-C transportation planning process. The agreement with the Ohio Department of Transportation (Ohio



Metropolitan Planning MOA) is dated 2024. The agreement with the Kentucky Transportation Cabinet (Kentucky Planning MOA) is dated, 2018. The agreement with the Indiana Department of Transportation (Indiana Metropolitan Planning Agreement MOA) is dated, 2023.

MPO Official Name: OKI Regional Council of Governments.

Year Founded: 1964.

Organizational Type/Status: Council of governments.

Member Jurisdictions and Number Represented: 3 states (OH-KY-IN), 8 counties (Hamilton, Butler, Warren, Clermont, Campbell, Kenton, Boone, and Dearborn), and nearly 200 communities.

Major Transit Operators: SORTA, TANK, BCRTA, MTS, CTC, WCTS, and the City of Cincinnati.

4.2.3 Findings: The FHWA/FTA Federal Review Team finds that the Metropolitan Planning Area Boundaries meet the requirements of 23 U.S.C. 134(d) and 23 CFR 450.314(a).

4.3 Unified Planning Work Program

4.3.1 Regulatory Basis

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

4.3.2 Current Status: the FY2025 UPWP for OKI was reviewed with comments by FHWA and FTA and approved in 2024 as meeting all of the requirements of Title 23 and 49 U.S.C. with performance-based planning activities, budgetary fiscal constraint, inclusions of public transit



agency planning activities and budgets, addresses Planning Emphasis Areas and transportation legislation, and was developed in partnership with federal, state, and local partners.

4.3.3 Findings: the next FY2026 UPWP update will take place in April of 2025. The FHWA/FTA Federal Review Team finds that the UPWP meets the requirements of 23 CFR 450.308 set forth under Titles 23 and 49 U.S.C.

4.4 Metropolitan Transportation Plan

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). Among the requirements are that the MTP address at least a 20-year planning horizon and that it includes both long and short-range strategies that lead to the development of an integrated and multi-modal system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.

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

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

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

- 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: the 2050 MTP Update was adopted in June 2024 with another update planned for June 2028. OKI was successful with the quality and comprehensiveness of the 2050 MTP, including an innovative and efficient delivery mechanism of a dedicated website for member, stakeholder, and public consumption and comment with MTP webpages committed to all elements of the MTP. Successful aspects of the 2050 MTP were a substantial public and stakeholder Outreach campaign, Accessibility, Federal Performance Based Planning & Programming, Congestion Management Process (CMP) and analysis, environmental consultations for advancing Transportation Resiliency, Recommended Projects with Fiscal Demonstration, a robust Prioritization Process for evaluating projects with alternative transportation prioritization enhancements, and MTP impacts to vital factors and the Plan vision.

Additionally, Transportation Security is heavily reflected in the OKI MTP and transportation planning process via

- Project prioritization/selection consideration.
- Critical infrastructure analysis, performance measures, and mapping.
- Proactive HAZMAT transport risk mitigation in the transport of hazardous materials, with cargo restrictions hazardous material restricted routes .
- Planning analysis of Bridges particularly important to the OKI region and the nation, and those that present risks for homeland security efforts and emergency service.
- Partnerships with regional organizations, such as Security and Emergency Management Agencies, Disaster Preparedness Coalition for regional homeland security alignment with officials responsible for risk reduction from natural disasters.
- In partnership with regional partners, developed Regional Emergency Mapping System RAVEN911.
- Regional and sub-regional plans or studies that include security-related recommendations for future implementation.

4.4.3 Findings: The FHWA/FTA Federal Review Team finds that the 2050 MTP meets the requirements of 23 U.S.C. 134(c), (h) & (i) and 23 CFR 450.324.

Proposed FHWA/FTA Technical Assistance: With major planning product development such as the MTP, the MPO is encouraged to ensure that the timelines build in enough time for 30-day interagency consultation periods as in the case of Air Quality Conformity Determinations, extra time built into the development schedule to account for unforeseen variables and has a completion date well ahead of any lapse deadline. FHWA and FTA will assist the MPO assess planning product development schedules to identify any potential lapse risk.



4.5 Transit Planning & Coordinated Public Transit-Human Services Transportation

4.5.1 Regulatory Basis

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

4.5.2 Current Status: FTA provided preliminary transit questions and OKI provided written responses to those questions in advance of the Site Visit (Appendix C). OKI did not make a formal transit presentation during the Site Visit. FTA, OKI, and representatives from two of the six transit operators in the Urbanized Area (i.e., City of Cincinnati Streetcar (Connector), and Southwest Ohio Regional Transit Authority (SORTA)) were present to provide additional clarification to the transit questions and discuss follow-up related to those topics. Because not all transit operators were present, some questions were unresolved. Transit operator representatives should be present at future Site Visits to discuss transit topics and their agency's working relationship with OKI.

In large Urbanized Areas (UZAs) with one or more Designated or Direct recipients, funds are allocated via a Split Letter. OKI coordinates the allocation of formula-based federal assistance on behalf of the Cincinnati UZA's six transit operators: Butler County Regional Transit Authority (BCRTA), Connector, Clermont Transportation Connection (CTC), SORTA, Transit Authority of Northern Kentucky (TANK), and the Warren County Transit System (WCTS). The 2021 Federal Funding Agreement between all six transit operators in the UZA codifies the method used annually to divide formula-based federal funds, including unobligated balances and obligated but not expended balances. With the 2021 Federal Funding Agreement, transparency and recordkeeping have improved due to a clear and consistent method in place, with corrections and redistributions limited to once per federal fiscal year. These are documented in the Split Letter.

At the Site Visit, OKI noted that the 2021 Federal Funding Agreement was facilitated and coordinated by OKI to address the recommendations contained in the 2021 Certification Review Report. The 2021 Certification Review Report specifically noted that CTC demonstrated repeatedly that it struggles to utilize its allocated formula funding before the funds are set to lapse. This has presented situations where FTA funds have been awarded to other transit operators so that federal funding is utilized. At the Site Visit, OKI confirmed that CTC has a history of challenges obligating and spending formula funds in a timely manner, and that the 2021 Federal Funding Agreement was an effective tool to address the problem.



OKI competitively awards funding for FHWA flexible funds (e.g., Surface Transportation Block Grant (STBG), Congestion Mitigation Air Quality (CMAQ), Carbon Reduction Program (CRP), and others) for projects that support the goals of OKI's Metropolitan Transportation Plan. These funds are commonly used by transit operators within the UZA to fund transit projects. As part of its prioritization process, OKI has incorporated an evaluation factor to account for an applicants' "History of Project Delivery". At the Site Visit, OKI noted that most challenges experienced with these programs are related to cost increases, procurement lead time, and environmental review.

OKI also competitively awards funding for FTA's Section 5310 program to improve mobility for seniors and individuals with disabilities. At the Site Visit, OKI noted that most challenges experienced with this program are related to subrecipients not completing and/or making changes to their original award request as well as vehicle cost overruns and local match shortfalls (both of which were most pronounced during the COVID-19 pandemic). At the Site Visit, OKI noted that it is taking steps to monitor subrecipients project implementation and to limit awards changes. A History of Project Delivery or similar factor is not incorporated in the 5310 project prioritization process.

4.5.3 Findings: Transit is integrated into OKI's planning process and fulfills the regulatory requirements. OKI's Coordinated Public Transit-Human Services Transportation Plan was last updated in September 2020 and must be updated at least every five years to be eligible for Section 5310 funding. OKI is currently updating this Plan.

Commendation #6 - Regional Transit Collaborative: OKI and the six transit operators within the UZA have established semi-quarterly meetings, known as the Regional Transit Collaborative. This group is distinct from the OKI Intermodal Coordinating Committee (ICC) as it serves as a clearinghouse for transit-focused topics and issues. It has increased communication and coordination among all transit operators within the UZA and provides a forum for timely discussions related to ongoing and emerging transit-related issues.

Recommendations

Recommendation #2 - Reduce Lapsed Fund Risk

OKI has made progress to address the 2021 Certification Review Report recommendation by facilitating the 2021 Federal Funding Agreement among the six transit operators in the UZA to incentivize more timely obligation and expenditure of funds. The "Cincinnati UZA Grant Balances" spreadsheet is a tool to assess unobligated balances as well as obligated but not expended balances consistent with the 2021 Federal Funding Agreement provisions. SORTA spearheads an update of the spreadsheet annually to calculate available funds and rebalance unobligated funds within the UZA in accordance with the 2021 Federal Funding Agreement. SORTA initiates the annual funding analysis, maintains the calculations and redistribution formulas within the spreadsheet, and works through an iterative process to reach concurrence among transit agencies. OKI produces an updated Split Letter reflecting redistributions, as necessary.



Even with these improvements, lapsing formula fund balances (i.e., federal funding not obligated with the respective programs' period of availability) occurred within the UZA as follows:

FFY2021 CTC & BCRTA (5339)

FFY2022 CTC (5307, 5339)

FFY2023 CTC (5307); SORTA (5337)

FFY2024 CTC (5339)

It is recommended that OKI investigate why the UZA continues to experience lapsing funds since the 2021 Federal Funding Agreement was executed. OKI should revisit the 2021 Federal Funding Agreement to evaluate: 1) The timing of the unobligated balance assessment that occurs annually in March; 2) The period of availability of each FTA formula fund program with the new three-year after appropriation provision; and 3) If there is another root cause and facilitate a remedy for the UZA. A remedy should be implemented by Federal FY2026 or before.

Furthermore, as the entity responsible for carrying out the "3-C" planning principles (comprehensive, cooperative, and continuous), OKI should take steps to transfer responsibility for managing the "Cincinnati UZA Grant Balances" spreadsheet from SORTA to OKI by Federal FY2026 or before.

Recommendation #3 - Link Transportation Planning to Transportation Programming

The transportation planning process provides a forum to define a project's purpose and need by framing the scope of the problem to be addressed by a proposed project. As the entity responsible for coordinating transportation across the region, OKI should strengthen the relationship between the transportation planning process of regional transit operators and their respective TIP submissions. OKI should evaluate ways to strengthen this linkage, for example by adding a field to the TIP submission form to identify where a project or project phase originated within the transportation planning process or product. By doing so, OKI will help to ensure that a sound transportation planning process or product underpins programming of Federal transit funds. This recommendation should be implemented in OKI's next TIP update, which occurs every two years.

Recommendation #4 - Share Transit Performance Information

OKI has developed a standalone website that displays regional performance measures. This is a best practice that provides full transparency and allows interested parties to view all transportation-related performance information quickly and easily in one place without having to search through multiple documents. OKI should integrate directly or by reference, transit-related goals, objectives, performance measures, and targets in its performance measures website. At the time of the October 2024 Site Visit, performance data related to transit Safety and transit Infrastructure Condition were not available on the OKI website. These should be updated at the same time as other regional performance measures, a placeholder should be included on the website directing interested parties to where the information can be found, or other options should be evaluated. This recommendation should be implemented in Federal FY2025.



Schedule for Process Improvement:

- a. Recommendation #2 - Reduce Lapsed Fund Risk: Federal FY2026 or before.
- b. Recommendation #3 - Link Transportation Planning to Transportation Programming: Next TIP update.
- c. Recommendation #4 - Share Transit Performance Information: Federal FY2025.

4.6 Transportation Improvement Program & Self-Certification

4.6.1 Regulatory Basis

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

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

4.6.2 Current Status: The OKI FY2024-2027 TIP documents how Federal, State, and local funds will be expended on highway and public transportation improvements and contains all federally funded and regionally significant projects. The TIP includes State and local roadway, bridge, bicycle, pedestrian, safety and transit projects. OKI coordinated the fiscally constrained, multi-modal TIP through a comprehensive, continuing and cooperative effort with FHWA, FTA, ODOT, KYTC, INDOT, LPAs, public transit operators, the public, and other interested parties. ODOT, KYTC, and INDOT submit to OKI a list of proposed projects on the state-maintained facilities in the region. The states' projects are prioritized and selected through their respective statewide transportation planning processes. OKI also coordinates with transit operators in the region to include transit projects in the TIP. Going forward, the respective DOTs should continue to provide



OKI with the information needed to list the estimated project cost for all projects listed in the TIP in accordance with 23 CFR 450.326 (g) (2).

OKI used their extensive project selection/scoring criteria to guide the development of the current adopted TIP, and to provide the public and other interested parties, including the organization's social impact committee, with opportunities to review and comment on the proposed program of projects. The projects submitted for inclusion in the TIP are evaluated and prioritized using scoring criteria that incorporates the national planning factors, performance measures and targets, regional goals outlined in the 2050 Metropolitan Transportation Plan updated in 2024, air quality, regional strategic policy plan, and active transportation.

In accordance with regulatory requirements for performance measures and management, OKI has coordinated with the respective DOTs and transit agencies and has documented the required performance measures (i.e. safety, bridge and pavement condition, travel time reliability, air quality, and transit asset management) in the FY2024-2027 TIP, as well as the updated 2050 MTP. In addition, the MPO has specifically outlined the anticipated effect of the projects included in the TIP toward achieving the performance targets identified in the MTP, linking investment priorities to those performance targets.

TIP maintenance thru amendments and modifications have been conducted in coordination with the OKI technical advisory committee (the Intermodal Coordination Committee (ICC)) FHWA state divisions, FTA regions, respective state DOTs, as well as the interagency council (IAC) and U.S. EPA when amendments have applicable U.S. DOT air quality conformity determinations.

In accordance with the procedures outlined in the Participation Plan, and in alignment with local directives, OKI used web-based tools to solicit and collect feedback from members of the public and stakeholders. Comments received were reviewed and documented by OKI staff and made available as an Appendix to the FY2024-2027 TIP.

OKI's most recent Annual Listing of Projects (ALOP) has been developed in accordance with the requirements of 23 U.S.C. 134(j)(7) and 23 CFR 450.334 requiring 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 OKI ALOP listing includes all federally funded projects authorized or revised to increase obligations in the preceding program year and: 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.

As required in 23 CFR 450.334, the MPO Board of Directors adopted the Self-Certification of the FY2024-2027 TIP and urban transportation planning process in April of 2023 certifying that the urban transportation planning process is being carried out in conformance with all the applicable federal regulations and in accordance with all applicable requirements.



The next OKI TIP Update will be the FY2026-2029 TIP with anticipated adoption in April 2025.

4.6.3 Findings: The FHWA/FTA Federal Review Team finds that the FY2024-2027 TIP meets the requirements of 23 U.S.C. 134(c),(h) & (j) and 23 CFR 450.326.

4.7 Public Participation

4.7.1 Regulatory Basis

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

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

4.7.2 Current Status: The OKI 2022 Public Participation Plan is very thorough, defined, and comprehensive. The plan details the participation policy and process generally as well as pertaining to major planning products and special studies including administration and amendments. The plan also details the process for defining target groups and areas, with notable inclusion of social impacts, as well as incorporating the assessment of participation fairness. The 2022 Public Participation Plan also details the plan implementation with administration, a social impact committee, technical support, and evaluation of the plan.

The MPO secures active and representative participation from all segments of the OKI community during planning and decision-making processes. OKI achieves meaningful public involvement through broad community representation, community relationships, and a range of engagement methods. Public participation, outreach, and interagency coordination is achieved thru Board structure and processes, in-person public outreach, attendance of governmental meetings and community events, performing community service, electronic public outreach and media, the OKI



website, social media (Facebook, Twitter, YouTube and LinkedIn), email notifications, E-Newsletters, public surveys, media relations, and targeted virtual public meetings.

Interagency coordination is conducted thru the Intermodal Coordinating Committee (ICC), the Interagency Council, and in-depth participation in other transportation official organizations such as, but not limited to, the Ohio Association of Regional Councils (OARC) and the Kentucky Statewide Interagency Consultation Quarterly Conference Call.

OKI has recently overhauled the OKI website to great success that is critical for public involvement and information delivery to various agencies and stakeholders.

Represented by this report's official Recommendations (Section 5.3), is one improvement topic for which all the Federal partners agree and strongly suggest: to improve public involvement, and interagency coordination, OKI invest resources in the development and policy regarding regular virtual meeting presentation options. It is understood that the MPO's By-Laws must be adhered to.

Additionally, it is understood that 118 Board members can be challenging to manage virtually. However, for Committee, Group, Forum, Commission, Outreach, and Team meetings it is recommended that OKI employ virtual meeting option(s) to increase public participation, stakeholder attendance and input, and provide for greater State DOT and Federal partner visibility and attendance. Not all virtual meeting and/or live-stream solutions may be a fit for OKI's needs, as such no specific method is being suggested with discretion to OKI to explore options that best fit their needs and budget.

4.7.3 Findings: The FHWA/FTA Federal Review Team finds that the MPO's Public Participation and Interagency Coordination meets the requirements of 23 CFR 450.316(a) and (b).

Commendation #3: Technology - Website - General: The MPO has recently overhauled the OKI website to great success that is critical for public involvement and information delivery to various agencies and stakeholders. The website very effectively provides a wealth of information for the public and stakeholders with dedicated pages and downloadable content for all transportation local and regional planning products and programs, public participation notices, resource library, funding opportunities and guidance, calendar events, and committees/commissions/forums.

Commendation #4: Technology – GIS Upgrades: The OKI website also features the MPO's upgrades in GIS with the hosting of an impressive 30 interactive data & mapping application pages dedicated to a wide-variety of transportation GIS applications providing visualization, analytics, and dashboard information to the MPO membership, interagency partners, local officials, and the public. The transportation related GIS applications include a focus on TIP & MTP Projects, Freight (truck & rail), Bike/Pedestrian, Bridge, Maritime, Congestion, Crashes, Pavement



Condition, Project Application Assistance, Rail, Emergency Response, Housing, TIP Projects, Traffic Counts, and Transit as well as several other applications.

Recommendation #1: Technology - Meeting Virtual Options: It is recommended that OKI adopt policy for the implementation of more Virtual Options for meetings and events that are feasible for the MPO to do so, such as: Committee, Group, Forum, Commission, and Team meetings to increase public participation, stakeholder attendance and input, and provide for greater interagency coordination, visibility and attendance.

4.8 Civil Rights (Title VI & ADA)

4.8.1 Regulatory Basis

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

4.8.2 Current Status: OKI’s Title VI and ADA policy and approach is described as: Targeted Universalism, which sets universal goals from which all groups benefit, achieving the goals thru targeted approaches. OKI’s commitment to the civil rights topics, processes and procedures are clearly defined in the OKI Title VI Program document.

Title VI:

The MPO’s website and documents state that OKI operates its programs and services without regard to race, color, national origin, religion, sex, age and/or disability in accordance with Title VI of the Civil Rights Act. The OKI Title VI Program was recently updated FY2025-2028.

The OKI Title VI Program and Participation Plan clearly define a Title VI Complaint Procedure, including OKI contact information, guidance, process explanation, and a complaint form. OKI has not received Title VI, ADA, or Section 504 complaints since the last Certification Review in 2021.

Title VI Compliance/Non-Compliance Reporting:

From the OKI Title VI Program document, throughout the year, the Title VI Coordinator periodically meets with the CEO / Executive Director of OKI to review the policies and procedures



relative to Title VI. This includes, but is not limited to, a review of files and statistics of complaints received for investigation and services offered to recipients and beneficiaries of OKI services. The OKI offices, departments, divisions that receive federal funds continually collect program data, although it is not always documented to denote such. Self-surveys are periodically sent to sub-recipients and subgrantees. These self-surveys examine all facets of the programs offered by the agency surveyed. OKI will also conduct on-site reviews and assessments on a triennial basis. Instances of which the on-site and/or survey reveal that the agency or one or more of its programs is not in compliance with Title VI, an investigation will be conducted by the Title VI Officer, Coordinator or Liaison. Records of the self-survey and efforts put forth to bring the agency into compliance will be maintained. These will include correspondence, resolution and corrective actions.

In the event of non-compliance with this plan, or applicable regulations and laws are determined via a complaint investigation or through the self-survey process, OKI makes every effort to attain full compliance. The Title VI Officer, Coordinator or Liaison shall notify the appropriate department head in the event that a complaint investigation, compliance review or self-survey indicates non-compliance. The notification shall state the condition of non-compliance, recommended approach to correct the situation, and the timeframe for the response and corrective action. The Title VI Officer, Coordinator or Liaison may conduct an in an interview to consult with the department head regarding the correct approach to remedy non-compliance.

Americans with Disabilities Act (ADA):

OKI has developed a Title II Self-Evaluation & Transition Plan to outline compliance with ADA standards/requirements in its transportation planning process, as well as physical accommodations related to the accessibility of public buildings and meetings. The Plan also outlines OKI's grievance procedure to document, report and address Title II complaints on its transportation planning process.

4.8.3 Findings: The FHWA/FTA Federal Review Team finds that the MPO's meets the requirements of the Civil Rights Act.

4.9 Consultation and Coordination

4.9.1 Regulatory Basis

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

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



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

4.9.2 Current Status: Closely related to the Interagency Coordination status and findings in Section 4.7, the MPO conducts interagency coordination thru the Intermodal Coordinating Committee (ICC), the Interagency Council (IAC), and in-depth participation in other transportation official organizations such as, but not limited to, the Ohio Association of Regional Councils (OARC) and the Kentucky Statewide Interagency Consultation Quarterly Conference Call.

For the development of the OKI FY2024-2027 TIP all public input requirements for the TIP followed the requirements of the 2022 OKI Participation Plan. The draft TIP was presented for public comment via an online posting on March 10, 2023. The comment period remained open until April 12, 2023. A presentation about the draft TIP was posted to OKI's website on March 10, 2023. A public meeting was held in the OKI office on April 4, 2023. Announcement of the scheduled public meeting was published in the Cincinnati Enquirer, La Mega Nota and the Cincinnati Herald and on the OKI website. Comments were permitted to be submitted to OKI in writing, by e-mail or personal testimony at the public meeting. All public comments were presented to the OKI Board of Directors at their April 13, 2023, meeting. The TIP was not changed significantly from the initial document made available for public comment and no new issues were raised by the public. Furthermore, the TIP was vetted thoroughly by the ICC technical advisory committee, state DOTs, the OKI Board, and Executive Committee. Administrative Modifications and Amendments to the TIP, and any associative air quality conformity determinations, have been coordinated effectively through the ICC and IAC.

For the development of the OKI 2050 MTP Update, outreach and coordination was accomplished via several methods. Firstly, the Board structure and process provided for 18 meetings with the Board, Executive Committee and the Intermodal Coordinating Committee (ICC) technical advisory committee that included nearly 200 people in total. There was also In-Person Outreach conducted with the attendance of 4 governmental meetings and 1 community event. Electronic public outreach and media concerning the MTP included 10 major website updates including a dedicated webpage to the 2050 MTP, 52 social media posts seen by >10,000 people, a total of 4 paid ads reaching 49,846 people, 5 emails distributed to 300+ individuals, and 1 virtual public meeting. The MTP's U.S. DOT air quality conformity determination was coordinated all relevant FHWA state district, FTA Regional, USEPA Regional offices.

4.9.3 Findings: The FHWA/FTA Federal Review Team finds that the MPO's Consultation and Coordination meets the requirements of 23 U.S.C. 134 and 23 CFR 450.



4.11 Freight Planning

4.11.1 Regulatory Basis

The MAP-21 established in 23 U.S.C. 167 a policy to improve the condition and performance of the national freight network and achieve goals related to economic competitiveness and efficiency; congestion; productivity; safety, security, and resilience of freight movement; infrastructure condition; use of advanced technology; performance, innovation, competition, and accountability, while reducing environmental impacts.

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

4.11.2 Current Status: Since the adoption of OKI's first regional freight plan in 2011, the MPO has continued to collect, analyze and share the most current freight data. At freight.oki.org, interactive maps and dashboards have been created to visually-communicate the most current surface transportation data for the road, rail, river and runway freight modes in the OKI regional planning area. Due to federal restrictions, OKI has not created visualizations showing pipeline, the fifth freight mode, data.

Recognizing the link between freight transportation mobility and economic development, OKI prepared a new Freight Plan that was approved by the Board of Directors in September 2023 to understand industry trends and forecast freight demand across all five freight modes. The Freight Plan resulted in the identification of a combined 147 project, program, planning study and policy recommendations. OKI's assessment of the region's existing multimodal freight system performance covers five key goal areas for each freight mode (Road, Rail, River, Runway, and Pipeline).

For the 2050 MTP recommended priorities, 115 freight improvements were considered. OKI's stated aim of a freight project is to supply a more reliable and efficient transportation system, reduce travel time and cost, and enhance the overall quality of life for users of the transportation network. In addition, the MTP included 9 program recommendations that are activities to study the feasibility or effect of freight transportation opportunities within the OKI region; 13 planning study recommendations that propose a comprehensive analysis of a particular freight transportation issue or location; and 10 policy recommendations that propose a course of action designed to guide the development and implementation of freight transportation policies, programs, and regulations.

OKI believes the success of the regional freight plan will depend on the partnerships and collaboration of the public and private sectors. Railroads, trucking interests, barge terminals and air cargo carriers will need to collaborate to address the transportation challenges facing OKI and the region over the next 30 years.



The MPO has also made investments into the development of Advanced Air Mobility (AAM) with participation in an AAM Multistate Collaborative. In Ohio, OKI was instrumental in forming an AAM SW Ohio Regional Team in 2023, as well as analyzing a AAM regional healthcare provider use case, and airport EV charging infrastructure planning and improvements. In Kentucky, OKI was instrumental in forming an KY AAM Working Group in 2024, supporting united KY AAM infrastructure planning, strategizing, education, and advocacy, as well as participating in a National AAM Multistate Collaborative.

4.11.3 Findings: The FHWA/FTA Federal Review Team finds that the MPO's Freight planning meets the requirements of 23 U.S.C. 167, 23 U.S.C. 134 and 23 CFR 450.306.

Commendation: Commendation #5 - Freight: The MPO has demonstrated Freight distinction by developing in-house a new Freight Plan FY2022 & 2023 that includes all 5 freight modes, 40+ unique datasets, 200+ visualizations, and presents 147 freight recommendations. The MPO also created and hosts a dedicated webpage for the effective and efficient delivery of information to the public of the Freight Plan's goals, components, and data. In 2023, the MPO also organized and hosted a second Conference on Freight that boasted 230 attendees from 20 states. Providing a regional focus and important collaboration between the States of Ohio and Kentucky, the conference included 3 keynote speakers, Freight Lighting Talks, 8 educational sessions, and a CVG air cargo tour. The conference also hosted joint annual meetings of the Mid-America Freight Coalition (MAFC) and Institute for Trade and Transportation Studies (ITTS) freight organizations. The MPO also successfully secured 2 CRISI grants for freight terminal projects, as well as actively supports public/private partnerships for maritime freight and the advancement of Advanced Air Mobility in the OKI region.

4.13 Transportation Safety

4.13.1 Regulatory Basis

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

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

4.13.2 Current Status:

The MPO states in the 2050 MTP update that one of the primary goals of the MTP is to improve travel safety by reducing the risk of crashes that cause death or injuries. To reach the MTP and



TIP safety goals, OKI coordinate fully with the individual Ohio, Kentucky, and Indiana State Highway Safety Plans (SHSP) and local communities in its planning area.

The OKI TIP and MTP use crash data developed by the SHSP for each of the tri-state planning region (OH-KY-IN) to evaluate and prioritize locations for funding and further the attainment of each state's safety performance targets. Many of the projects in the OKI TIP and Plan are directly linked or are consistent with the safety plans and programs for the tri-state programs as well as overall requirements of IIJA performance-based planning. OKI has incorporated the cost of excessive crashes into its project prioritization process. This approach combines crash rates, expected crash rates and costs by accident type to enable the identification of potential high value investment locations. Locations that have high excess expected costs are awarded higher points in the prioritization process. This assists state and local agencies in identifying transportation needs for further study and, when possible, finding resources to meet those needs.

The OKI FY2024-2027 TIP and amendments must be developed in compliance with the transportation performance measure requirements of the IIJA for safety measures. In February 2023, OKI's Executive Committee adopted a resolution supporting each individual state safety performance targets, for the five safety performance measures listed below, as established by ODOT, KYTC and INDOT. OKI has agreed to plan and program projects so that they contribute toward accomplishment of each state's safety performance measure targets.

Within the OKI region, more than 66,000 crashes occurred each year between 2017 and 2021, ending, on average, 160 lives, and causing more than 10,500 injuries. Available data indicates that fatalities have decreased 9.4 percent in the OKI region since 2017. Fatalities during the 5-year time period peaked in Hamilton County in 2021 with 72, while one fatality occurred in Campbell County in 2021. In the OKI region, Butler and Clermont Counties in Ohio, Boone, Campbell and Kenton Counties in Kentucky, and Dearborn County in Indiana, all had a fatality rate above 1.0 during at least one year, between 2017 and 2021. Over the five-year time period, the average rate of fatalities for the OKI Region was 0.84, well below each state's adopted statewide performance safety target.

For serious injuries accidents where at least one individual has been incapacitated in a motor vehicle crash during a calendar year, Boone County in Kentucky and Dearborn County in Indiana saw an increase in serious injuries between 2017 and 2021. The OKI region as a whole experienced a 13.2 percent decline in the number of serious injuries over the same time period. In the OKI region, the rate of serious injuries declined in every county except Boone County in Kentucky and Dearborn County in Indiana, between 2017 and 2021. In Clermont County, the rate of serious injuries declined by 33 percent from a high of 9.43 in 2017. As a whole, the OKI region experienced a decline of 7.3 percent in the rate of serious injuries over the five-year time period.

Reported bicycle and pedestrian fatalities in the OKI region peaked in 2021 with 36. Bicycle deaths and pedestrian fatalities have totaled 31 or less in each year from 2017-2021. Bicycle and pedestrian serious injuries peaked in 2018 with 172, before dropping sharply to 121, in 2019. By



2021, bicycle and pedestrian serious injuries had fallen to 113. The majority of serious injuries have involved pedestrians.

During the planning period 2020 to 2050, a safety challenge will present itself in a magnitude not seen previously in the OKI region: the older driver. More than 364,000 persons aged 65 and older are projected to populate the region in 2050, compared with 329,396 in 2020, and will constitute roughly one-fifth of the population of driving age in the OKI region. Countermeasures OKI has identified to help senior drivers more safely offered in the MTP Countermeasures include explanatory signage, larger signage, redundant signage, advance notice signage, explicit pavement markings and back plating on signals. All of these countermeasures are low-cost and able to be implemented within the confines of the existing roadway.

To address the elderly needing additional time to cross a street due to shorter stride, slower gait and slower reaction time, educational plaques and leading pedestrian intervals on signals can improve pedestrian safety. An added value of countermeasures addressing the needs of the elderly is the fact that they also enhance safety for travelers of all ages.

4.13.3 Findings: The FHWA/FTA Federal Review Team finds that the MPO's Transportation Safety meets the requirements of 23 U.S.C. 134, 23 CFR 450.306, and 23 CFR 450.306.

4.15 Transportation Alternatives/Active Transportation

4.15.1 Regulatory Basis

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 450.306 sets forth the requirement that the scope of the metropolitan planning process "will increase the safety for motorized and non-motorized users; increase the security of the transportation system for motorized and non-motorized users; and protect and enhance the environment, promote energy conservation, improve the quality of life.

4.15.2 Current Status: In the support of Transportation Alternatives/Active Transportation, the MPO has adopted a Complete Streets Policy (2022) and updated it in 2024. Provisions for complete streets have been incorporated into the TIP process to consider appropriate facilities for accommodating bicyclists, pedestrians and transit riders of all abilities, in addition to motorists.

OKI has also developed and adopted a Pedestrian Plan, and a Regional Bike Plan. OKI's Transportation Improvement Program (TIP) prioritization/evaluation process encourages



inclusion of active transportation (bicycle and pedestrian) facilities through awarding points for intermodal connectivity and multimodal facilities.

Additionally, OKI collects Pedestrian and Bicycle traffic counts to inform those plans and recommended projects.

Bicycle and pedestrian transportation needs were identified during the 2050 MTP update process, recommending 41 fiscally constrained improvement projects to directly address bicycle and pedestrian needs. Since 2010 nearly \$130 Million awarded to multi-use trails.

4.15.3 Findings: The FHWA/FTA Federal Review Team finds that the MPO's Transportation Alternatives/Active Transportation meets the requirements of 23 U.S.C. 217, 23 U.S.C. 134, and 23 CFR 450. and 23 CFR 450.306.

4.16 Integration of Land Use and Transportation

4.16.1 Regulatory Basis

23 U.S.C. 134(g)(3) encourages MPOs to consult with officials responsible for other types of planning activities that are affected by transportation in the area (including State and local planned growth, economic development, environmental protection, airport operations, and freight movements) or to coordinate its planning process, to the maximum extent practicable, with such planning activities.

23 U.S.C. 134 (h)(1)(E) and 23 CFR 450.306(a)(5) set forth requirements for the MPO Plan to protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns.

4.16.2 Current Status: The MPO recognizes the inseparable connection between transportation and land use, as such, the OKI Board maintains the Strategic Regional Policy Plan (SRPP) which contains a vision for regional vitality, sustainability, and competitiveness, focusing on the land use–transportation connection with the planning process. The SRPP integrates recommendations with the region's transportation project prioritization process. This metropolitan transportation plan incorporates, by reference, the Strategic Regional Policy Plan Goals, Opportunity Areas and Policy Recommendations, as adopted by OKI's Land Use Commission Steering Committee in June 2023.

The MPO also has developed and maintains the Fiscal Impact Analysis Model (FIAM) to aid local governments wanting to analyze benefits and fiscal consequences of land use changes within their communities. The FIAM assesses the costs and revenues associated with land use activities and their existing and potential impacts on community budgets. These estimates help



communities anticipate and plan for current and future costs of growth. As communities better understand associated costs and revenues of development through fiscal impact analyses, they will be better able to plan for transportation investments to serve new development or fix existing deficiencies.

To help inform local decision makers on community housing demand and need forecasting, OKI developed a very innovative Regional Housing Data Dashboard. The tool organizes critical and current data on community housing into three areas: People – who occupies/needs housing; Stock – existing and needed housing type; Market – costs and trends. OKI maintains the tool and provides technical support to communities using it to inform local housing planning policy.

4.16.3 Findings: The FHWA/FTA Federal Review Team finds that the MPO’s Integration of Land Use and Transportation meets the requirements of 23 U.S.C. 134 and 23 CFR 450.306.

Commendation: Commendation #1 - Housing in Transportation Planning/Technology: The MPO has been very innovative in integrating housing into the transportation planning process by launching the Regional Housing Data Dashboard in 2024 including conducting a public user workshop. With input from local community planners, the dashboard is designed to inform local planning and discussion on housing topics and encourage a data-driven approach to assessing current housing options and setting housing goals and policy. The Regional Housing Data Dashboard directly addresses the focus placed on the consideration of housing in the metropolitan transportation planning process in the Infrastructure Investment and Jobs Act (IIJA) and could be model case-study for MPOs throughout the country.

4.18 Air Quality

4.18.1 Regulatory Basis

The air quality provisions of the Clean Air Act (42 U.S.C. 7401) and the MPO provisions of Titles 23 and 49 require a planning process that integrates air quality and metropolitan transportation planning, such that transportation investments support clean air goals. Under 23 CFR 450.324(m), a conformity determination must be made on any updated or amended transportation plan in accordance with the Clean Air Act and the EPA transportation conformity regulations of 40 CFR Part 93. A conformity determination must also be made on any updated or amended TIP, per 23 CFR 450.326(a).

4.18.2 Current Status: The OKI transportation planning area includes the Cincinnati-Middletown-Wilmington OH-KY-IN Ozone Maintenance Area (2008 Ozone) with maintenance status Ohio counties of Hamilton, Butler, Warren, and Clermont. Clinton County is also included in the ozone maintenance area, but the county is not part of the OKI planning area. In Kentucky, the ozone maintenance includes the northern portions of Boone, Kenton, and Campbell



Counties. And there is one southeast corner portion of Dearborn County, Indiana included in the ozone maintenance area.

The OKI transportation planning area includes the Cincinnati Ozone Area (2015 Ozone Standard) with attainment status reclassified in 2022 for Hamilton, Butler, Warren, and Clermont Counties in Ohio. The Cincinnati Ozone Area in Kentucky includes the northern portions of Boone, Kenton, and Campbell Counties with attainment status reclassified in 2023. Dearborn County, Indiana is not part of the Cincinnati Ozone Area. The reclassification of the Cincinnati Ozone Area to attainment status is a clear demonstration of success from the last certification cycle in improving ozone air quality in the OKI transportation planning area.

Ohio EPA (OEPA), in coordination with U.S. EPA Region 5 and OKI, completed the Second 10-Year Maintenance Plan for the Ohio Portion of the Cincinnati, OH-KY-IN 8-Hour Ozone Maintenance Area (2008 Ozone standard) in 2024 that ensures Ohio can maintain the 2008 8-hour ozone NAAQS in the OKI area for at least 20 years from the effective date of the first maintenance plan. The MPO has two separate Motor Vehicle Emission Budgets (MVEB) to use, as Ohio/Indiana and Kentucky have separate budgets. The MPO has chosen to conduct a comprehensive conformity analysis for all three states. OKI completed the MOVES4 modeling for developing mobile emissions and establishing budgets for the second period maintenance plan for the Ohio portion of the Cincinnati, OH-KY-IN 2008 ozone maintenance area. KYTC provided MOVES4 modeling, using an activity-based hybrid model to feed MOVES4, for the Kentucky portion of the Cincinnati, OH-KY-IN 2008 ozone maintenance area. The second maintenance plan conducted a public participation and Interagency Coordination (IAC) as required.

The OKI 2050 MTP and FY2021-2024 TIP and corresponding amendment procedures have complied with Air Quality Conformity requirements. From 2022-2024 the OKI MTP and TIP air quality conformity included 24 total amendments - 8 amendments with exempt projects requiring U.S. DOT joint air quality conformity determinations, 4 amendments requiring new regional emissions analysis, and 12 amendments that relied on previous regional emissions analysis which include adding non-exempt projects from the MTP to the TIP with no change in scope or timeline, adding new phase(s) and new committed funds to existing non-exempt TIP projects, and increasing phase funding more than threshold amount. Interagency consultation (IAC) was conducted in accordance with the MPO's Conformity Memorandum of Agreement.

Congestion Mitigation and Air Quality (CMAQ) - a Mid Performance Plan adopted in 2024 for the States of Ohio, Kentucky and Indiana. The MPO being required to report specifically on regional condition, targets, and performance for the federal performance measures identified to carry out the Congestion Mitigation and Air Quality Improvement (CMAQ) Program. The performance measures of Annual Hours of Peak Hour Excessive Delay (PHED) Per Capita, Percent of Non-Single Occupancy Vehicle (SOV) Travel, and Total Emissions Reduction, for all CMAQ-funded projects, of each applicable criteria pollutant and precursor are reflected in the OKI Baseline Performance Period Report, which includes a description of CMAQ-funded projects programmed during the current performance period of 2018-2021. These performance measures are also reflected in



the Mid Performance Period Report and Full Performance Period Report, which are required on a biennial basis and report on the progress in reaching 2- and 4-year performance targets.

4.18.3 Findings: The FHWA/FTA Federal Review Team finds that the MPO's integration of Air Quality into the planning process meets the federal requirements and regulations.

4.19 Congestion Management Process / Management and Operations

4.19.1 Regulatory Basis

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

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

4.19.2 Current Status: The MPO has successfully executed congestion management and reduction practices by engaging in an update of the Congestion Management Process (CMP), validation of the OKI travel demand model, development and adoption of a new Freight Plan, hosting a Freight Conference, operating a ride-share program, and a Regional ITS architecture upgrade with an ITS strategic plan.

In 2024, OKI completed and posted to website the OKI CMP Findings and Analysis. The goals of which are: Improve livability and economic vitality of the region, Limit congestion and increase accessibility to jobs, Improve transportation safety, Develop strategies to facilitate the mobility of people and goods. Using the congestion index several individual interstate and non-interstate roadways and corridors stand out as being very congested during 2021. Of the top 20 most congested NHS corridors 13 were located in Ohio and all were interstates, including the Brent Spence Bridge. Of the 15 most congested interstate segments 11 were located in Ohio and all but two were located on I-75. Of the 14 most congested non-interstate segments 10 were located in Ohio and all but three were located on a US or state route.

As stated in the 2024 OKI CMP Findings and Analysis, the CMP has been integrated into OKI's transportation planning process. OKI has developed a scoring system intended to assist selection of worthy capacity related highway and transit projects for the OKI 2050 MTP. Public input and



the OKI Board of Directors determine the final recommended list of projects. A similar, but distinct and more rigorous scoring system, has been developed for the TIP. The level of congestion is an important criterion in the roadway project scoring. The scoring system was originally adopted by the OKI Intermodal Coordinating Committee (ICC) and Board of Trustees in 2000 to evaluate Transportation Improvement Program (TIP) and ODOT Transportation Review Advisory Committee (TRAC) projects. Since that time, the scoring system has been modified to fit the nature of the OKI 2050 MTP Update and FY2024-2027 TIP. The latest modification incorporated regional performance measures. The process makes best use of available data and emphasizes the use of a performance-based planning approach. It provides a systematic methodology to ranking the numerous projects that need to be evaluated in the development of a financially constrained metropolitan transportation plan and TIP. Routine maintenance projects are not included since they are of high importance and are assumed to be part of the Plan. The CMP is further integrated into the transportation planning process by utilizing the observed speeds, collected as part of the CMP, in the validation and calibration of OKI's Activity-Based Model.

During the development of the 2050 MTP Update, OKI recognized that an increase in highway capacity is not always the most appropriate or preferred solution for a congestion problem. Travel demand management strategies, Telecommuting, Transportation Systems Management and Operations (TSMO) and ITS technologies and expanded public transportation are also considered.

OKI's Activity-Based Travel Demand Model serves as the foundation for the transportation modeling efforts. Guided by state and federal guidelines, OKI is committed to excellence and innovation, and continuously strives to improve the modeling techniques and stay at the forefront of industry advancements. OKI collects and analyzes traffic and travel data to ensure the model reflects the unique characteristics of our region. OKI also works closely with the tri-state DOTs, local governments, transportation agencies, and stakeholders to ensure the models align with their needs and priorities. Specifically, the transportation modeling helps assess the potential impacts of new development and changes in population and demographic trends, road expansions and transit projects, changes in transportation policies, technological advancements, energy consumption and sustainability. By analyzing the different scenarios and policies with the modelling, OKI evaluates their effects on congestion, travel times, air quality, and overall accessibility. Model calibration and validation took place between 2023 and 2024. The next model calibration and verification will use 2025 as the base year and include transit on-board and household travel survey data.

The MPO updated the Intelligent Transportation System (ITS) architecture in 2022 with help from Federal and State partners. The update includes a section on Connected Vehicle (CV)/Electric Vehicle (EV) technologies, planned integrated technologies in the future - resulted in a more simplified approach to better navigate the system. Developed completely in-house. Established ITS Architecture Committee, with a time horizon of 10-years, 36 Phase I projects identified over the next 4 years, 25 Phase II projects identified beyond 5 years for an estimated \$266M, but not fiscally restrained.



A question was asked of OKI during the site visit if there have been attempts to analyze if past projects were successful in congestion improvement/mitigation. OKI confirmed that completed projects have indeed been monitored post completion. And examples such as SR 4 in Butler County (OH) improved from a Level of Service (LOS) rating of E to A; Dixie Hwy (KY) improved from a LOS rating of D to B. Additionally, it was noted that the Brent Spence Bridge corridor as the most congested freight corridors - is one of the primary reasons why Freight levels are as high as they are in the Cincinnati area - and will be monitored for data on improved congestion.

4.19.3 Findings: The FHWA/FTA Federal Review Team finds that the MPO's Congestion Management Process / Management and Operations meets the requirements of 23 U.S.C. 134, 23 CFR 450.322, 23 CFR 450.324.

Commendation: Commendation #2 - Congestion Management Process (CMP)/ITS: The MPO has successfully executed congestion management and reduction practices by engaging in the update of the Congestion Management process including the identification of the most congested NHS corridors and monitoring projects for congestion reduction. Mobility and Congestion performance measures (Federal & Additional) have made progress or on track to meet all statewide targets. Other CMP and ITS activities include the validation of the OKI travel demand model, development and adoption of a new Freight Plan, hosting a Freight Conference, operating a ride-share program, establishing an ITS Architecture Committee with time horizon of 10-years, conducting a Regional ITS architecture upgrade including a section on CV/EV technologies and planned integrated technologies in the future, and the development of an ITS strategic plan. All those activities were delivered in-house with MPO staff and could be a case for a model CMP/ITS process.



5.0 CONCLUSION AND RECOMMENDATIONS

The FHWA and FTA review found that the metropolitan transportation planning process conducted in the OKI urbanized area **MEETS** Federal planning requirements as follows.

5.1 Commendations

The following highlight noteworthy practices that the OKI MPO is doing well in the transportation planning process:

Commendation #1 - Housing in Transportation Planning/Technology: The MPO has been very innovative in integrating housing into the transportation planning process by launching the Regional Housing Data Dashboard in 2024 including conducting a public user workshop. With input from local community planners, the dashboard is designed to inform local planning and discussion on housing topics and encourage a data-driven approach to assessing current housing options and setting housing goals and policy. The Regional Housing Data Dashboard directly addresses the focus placed on the consideration of housing in the metropolitan transportation planning process in the Infrastructure Investment and Jobs Act (IIJA) and could be model case-study for MPOs throughout the country.

Commendation #2 - Congestion Management Process (CMP)/ITS: The MPO has successfully executed congestion management and reduction practices by engaging in the update of the Congestion Management process including the identification of the most congested NHS corridors and monitoring projects for congestion reduction. Mobility and Congestion performance measures (Federal & Additional) have made progress or on track to meet all statewide targets. Other CMP and ITS activities include the validation of the OKI travel demand model, development and adoption of a new Freight Plan, hosting a Freight Conference, operating a ride-share program, establishing an ITS Architecture Committee with time horizon of 10-years, conducting a Regional ITS architecture upgrade including a section on CV/EV technologies and planned integrated technologies in the future, and the development of an ITS strategic plan. All those activities were delivered in-house with MPO staff and could be a case for a model CMP/ITS process.

Commendation #3 - Technology - Website - General: The MPO has recently overhauled the OKI website to great success that is critical for public involvement and information delivery to various agencies and stakeholders. The website very effectively provides a wealth of information for the public and stakeholders with dedicated pages and downloadable content for all transportation local and regional planning products and programs, public participation notices, resource library, funding opportunities and guidance, calendar events, and committees/commissions/forums.



Commendation #4 - Technology - GIS Upgrades: The OKI website also features the MPO's upgrades in GIS with the hosting of an impressive 30 interactive data & mapping application pages dedicated to a wide-variety of transportation GIS applications providing visualization, analytics, and dashboard information to the MPO membership, interagency partners, local officials, and the public. The transportation related GIS applications include a focus on TIP & MTP Projects, Freight (truck & rail), Bike/Pedestrian, Bridge, Maritime, Congestion, Crashes, Pavement Condition, Project Application Assistance, Rail, Emergency Response, Housing, TIP Projects, Traffic Counts, and Transit as well as several other applications.

Commendation #5 - Freight: The MPO developed in-house a new Freight Plan FY2022 & 2023 that includes all 5 freight modes, 40+ unique datasets, 200+ visualizations, and presents 147 freight recommendations. The MPO also created and hosts a dedicated webpage for the effective and efficient delivery of information to the public of the Freight Plan's goals, components, and data. In 2023, the MPO also organized and hosted a second Conference on Freight that boasted 230 attendees from 20 states. Providing a regional focus and important collaboration between the States of Ohio and Kentucky, the conference included 3 keynote speakers, Freight Lightning Talks, 8 educational sessions, and a CVG air cargo tour. The conference also hosted joint annual meetings of the Mid-America Freight Coalition (MAFC) and Institute for Trade and Transportation Studies (ITTS) freight organizations. The MPO also successfully secured 2 CRISI grants for freight terminal projects, as well as actively supports public/private partnerships for maritime freight and the advancement of Advanced Air Mobility in the OKI region.

Commendation #6 - Transit - Regional Transit Collaborative: OKI and the six transit operators within the UZA have established semi-quarterly meetings, known as the Regional Transit Collaborative. This group is distinct from the OKI Intermodal Coordinating Committee (ICC) as it serves as a clearinghouse for transit-focused topics and issues. It has increased communication and coordination among all transit operators within the UZA and provides a forum for timely discussions related to ongoing and emerging transit-related issues.

5.2 Corrective Actions

No corrective actions were identified by the Federal Review Team.

5.3 Recommendations

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

Recommendation #1 - Technology - Meeting Virtual Options: It is recommended that OKI adopt policy for the implementation of more Virtual Options for meetings and events that are feasible for the MPO to do so, such as: Committee, Group, Forum, Commission, and Team meetings to increase public participation, stakeholder attendance and input, and provide for greater interagency coordination, visibility and attendance.



Recommendation #2 - Transit - Reduce Lapsed Fund Risk: The MPO has made progress to address the 2021 Certification Review Report recommendation by facilitating the 2021 Federal Funding Agreement among the six transit operators in the UZA to incentivize more timely obligation and expenditure of funds. The “Cincinnati UZA Grant Balances” spreadsheet is a tool to assess unobligated balances as well as obligated but not expended balances consistent with the 2021 Federal Funding Agreement provisions. SORTA spearheads an update of the spreadsheet annually to calculate available funds and rebalance unobligated funds within the UZA in accordance with the 2021 Federal Funding Agreement. SORTA initiates the annual funding analysis, maintains the calculations and redistribution formulas within the spreadsheet, and works through an iterative process to reach concurrence among transit agencies. OKI produces an updated Split Letter reflecting redistributions, as necessary.

Even with these improvements, lapsing formula fund balances (i.e., federal funding not obligated with the respective programs’ period of availability) occurred within the UZA as follows:

FFY2021 CTC & BCRTA (5339)

FFY2022 CTC (5307, 5339)

FFY2023 CTC (5307); SORTA (5337)

FFY2024 CTC (5339)

It is recommended that OKI investigate why the UZA continues to experience lapsing funds since the 2021 Federal Funding Agreement was executed. OKI should revisit the 2021 Federal Funding Agreement to evaluate: 1) The timing of the unobligated balance assessment that occurs annually in March; 2) The period of availability of each FTA formula fund program with the new three-year after appropriation provision; and 3) If there is another root cause and facilitate a remedy for the UZA. A remedy should be implemented by Federal FY2026 or before.

Furthermore, as the entity responsible for carrying out the “3-C” planning principles (comprehensive, cooperative, and continuous), OKI should take steps to transfer responsibility for managing the “Cincinnati UZA Grant Balances” spreadsheet from SORTA to OKI by Federal FY2026 or before.

Recommendation #3 - Transit - Link Transportation Planning to Transportation Programming:

The transportation planning process provides a forum to define a project's purpose and need by framing the scope of the problem to be addressed by a proposed project. As the entity responsible for coordinating transportation across the region, OKI should strengthen the relationship between the transportation planning process of regional transit operators and their respective TIP submissions. OKI should evaluate ways to strengthen this linkage, for example by adding a field to the TIP submission form to identify where a project or project phase originated within the transportation planning process or product. By doing so, OKI will help to ensure that a sound transportation planning process or product underpins programming of Federal transit



funds. This recommendation should be implemented in OKI's next TIP update, which occurs every two years.

Recommendation #4 - Transit - Website - Share Transit Performance Information: The MPO has developed a standalone website that displays regional performance measures. This is a best practice that provides full transparency and allows interested parties to view all transportation-related performance information quickly and easily in one place without having to search through multiple documents. It is recommended that OKI integrate directly or by reference, transit-related goals, objectives, performance measures, and targets in its performance measures website. At the time of the October 2024 Site Visit, performance data related to transit Safety and transit Infrastructure Condition were not available on the OKI website. These should be updated at the same time as other regional performance measures, a placeholder should be included on the website directing interested parties to where the information can be found, or other options should be evaluated. This recommendation should be implemented in Federal FY2025.

5.3 Training/Technical Assistance

The following training and technical assistance are recommended to assist the MPO with improvements to the transportation planning process:

- A. OKI requested that FHWA continue to be part of the standard transportation planning meetings.
- B. OKI is encouraged to utilize the numerous resources the FHWA Every Day Counts (EDC) 8 Virtual Public Involvement (VPI) Website ([**FHWA VPI Website**](#)) designed to help State DOTs, MPOs, and local agencies understand the benefits of and adopt the use of VPI tools.



APPENDIX A - PARTICIPANTS

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

- Sam Wallace, Community Planner, FHWA Ohio Division
- Tim Long, Team Leader of Planning-Environment-Realty, FHWA Ohio Division
- Nick Vail, Community Planner, FHWA Kentucky Division
- Patrick Carpenter, Environmental Protection Specialist, FHWA Indiana Division
- Jocelyn Hoffman, Community Planner, FTA Region V
- Randy Lane, Statewide Planning Manager, Ohio Department of Transportation
- Nate Brugler, Regional Planning Coordinator, Ohio Department of Transportation
- Dane Blackburn, Planning Supervisor, Kentucky Transportation Cabinet Division 6
- Bob Koehler, Deputy Executive Director, OKI MPO
- Andy Reser, Manager of Transportation Programming, OKI MPO
- Julia Brossart, Communications & Legislative Affairs Manager, OKI MPO
- Travis Miller, Regional Planning Manager, OKI MPO
- Summer Jones, Transportation Alternatives Coordinator, OKI MPO
- Brett Porter, Senior Transportation Planner, OKI MPO
- Regina Fields, Project Administrator, OKI MPO
- Lorrie Platt, Executive Advisor & Board Administrator, OKI MPO
- David Shuey, Director of Information Systems & Analytics, OKI MPO
- Liren Zhou, Manager of Transportation Modeling, OKI MPO
- Robyn Bancroft, Strategic Initiatives Manager, OKI MPO
- Katie Hannum, Director of Finance, OKI MPO
- Elizabeth Niese, Data Analyst, OKI MPO
- Lori Burchett, Deputy Director-Streetcar Services, City of Cincinnati
- Andrew Aiello, Deputy General Manager, SORTA/Metro



APPENDIX B - STATUS OF FINDINGS FROM LAST REVIEW

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

2021 Recommendation 1 - Transit - Agreements: It is recommended that OKI update its planning agreement(s) with Ohio public transportation agencies to include the City of Cincinnati as a public transportation operator.

Disposition: Completed.

2021 Recommendation 2 - Transit - Transit Planning: It is recommended that OKI work with FTA, ODOT and the transit operators to identify a process to ensure that all parties: 1) have an accurate accounting of available and lapsing transit funding at the beginning of each federal fiscal year; and 2) document the completion status of projects awarded with federal funds from both FTA and FHWA on an annual basis. Having a current snapshot in these areas should influence how funds formula funds are allocated to better reflect the near-term capital and operating needs of transit operators and impact “history of performance” considerations in the OKI project selection process with respect to funds that are transferred from FHWA to FTA. Consideration should be given to incorporate this process into the one used to gather information for the annual listing of obligated projects.

Disposition: A new recommendation (Recommendation #2 - Transit - Reduce Lapsed Fund Risk) in this current review cycle has been issued to assist support continued progress.



APPENDIX C – MPO WRITTEN RESPONSES TO PRELIMINARY TRANSIT QUESTIONS

- 1) OKI is the designated recipient of FTA formula funds for the Cincinnati urbanized area. Please outline OKI staff's direct involvement with the annual formula allocation process.

OKI is the designated recipient of FTA Section 5310 funds. OKI is not the designated recipient of FTA 5307 and 5339 formula funds. The designated recipients are BCRTA, CTC, SORTA, TANK and WCTS. Effective in 2020, the City of Cincinnati became a direct recipient. In 2021, OKI facilitated a revised federal funding agreement among the six parties.

- a) As the designated recipient, what steps have been taken since the last certification review's recommendation to ensure appropriate funding levels are set annually for all transit agencies in the urbanized area.

- i) What methodology is used to allocate funds?

In 2021, OKI facilitated and coordinated a revised federal funding agreement between BCRTA, the City of Cincinnati, CTC, SORTA, TANK, and WCTS. The six parties agreed to allocate the Section 5307, 5339, and any other formula-based Cincinnati UA federal funds, excluding Section 5310 or competitive discretionary programs, according to the federal funding formula, as reported annually in the Federal Register. The agreement included new provisions to incent timely obligation and expenditure of funds. All recipients must report and certify unobligated and unexpended balances for all federal grant programs annually by March 1. Unobligated funds more than three years after appropriation and unexpended funds more than five years after appropriation will be removed from the subject transit system's current draft apportionment and redistributed to the other UA recipients.

- ii) Prior to the FFY24 allocations, when was the last time the methodology was updated?

The revised 2021 federal funding agreement was utilized for the FY2022, 2023 and 2024 funding allocations. As noted above, the agreement requires an annual review of unobligated and unexpended balances for all federal grant programs which informs each new annual UA split.

- b) Are agencies trading formula funds after the initial allocation? If so, please explain why.

Corrections and redistributions shall not be executed more once per federal fiscal year. The recipients agreed to implement any transfers only via the current year split.

- c) Using the current Federal fiscal year as an example, please outline the steps taken for the designated recipient to set funding levels for the individual transit agencies when FTA's apportionments notice was published. Steps should include:



i) Date when action started.

FTA announced FY2024 apportionments on 4/4/24. In April, and in keeping with past practice, SORTA began working on the split calculations. On 5/16/24 SORTA provided the draft splits to the recipients and OKI. Final concurrence on the FY24 split was received on 6/27/24. The final split letter was sent to FTA on 7/10/24.

ii) Dates each transit agency approved the funding levels.

Concurrence was received on the following dates: SORTA 5/30/24, BCRTA 5/30/24, Cincinnati 5/30/24, TANK 5/30/24, WCTS 5/30/24, CTC 6/27/24.

d) As of August 30, 2024 no FFY24 5307 and 5339 funds were awarded in a grant to the transit partners; please explain why.

Grantees cannot officially submit a grant until after the final split letter is delivered to the regional FTA office (in this case, 7/10/24). Grantees began submitting grants shortly thereafter and should be making their way through the system. Anecdotally, SORTA's FF24 formula grant was executed in September 2024.

e) Clermont Transportation Connection (CTC) was not allocated any FFY24 FTA funding; please explain why.

CTC has a history of challenges obligating and spending formula funds in a timely manner. During the annual review of funding balances, it was noted that CTC had a healthy balance of FFY23 5307 funds. Therefore, CTC and the UA partners agreed to not allocate more formula funding to CTC in FFY24. CTC agreed to this approach/split in June 2024.

2) Multiple transit agencies throughout the Cincinnati urbanized area are taking on facility projects. What coordination takes place between the MPO and respective transit agencies to ensure a 3C perspective when facility locations are selected?

Plans for major new transit facilities are included in OKI's 2050 MTP. These facilities include the SORTA Bond Hill and Queensgate Garages, and SORTA North College Hill and Walnut Hills Transit Center; and the BCRTA Moser Court Facility Renovation/Expansion, Oxford Multimodal Facility, and the Middletown Transit Hub. As funds are identified, all or phases of these facility projects are added to the TIP in accordance with OKI's public involvement process. Other minor facility upgrades may not be specifically listed in the 2050 MTP but are consistent with the MTP goals of maintaining existing infrastructure and supporting multimodal transportation. Additionally, OKI hosts the Regional Transit Collaborative where all the transit providers in the region meet regularly to discuss upcoming plans, projects, initiatives, needs, best practices, and opportunities for collaboration.

3) When additional transit funding was provided to transit agencies by FTA during the COVID-19 pandemic, funding levels were established by OKI. For example, Southwest Ohio RTA (SORTA) was allocated \$34,156,781 in CARES Act funding. SORTA's last drawdown of those funds occurred on July 21, 2020. CTC was allocated \$3,976,942 and as of August 30, 2024 \$976,417 (25%) remains undisbursed.



a) What methodology was used to allocate the stimulus funding?

The allocation of stimulus funding followed the existing UA agreement and utilized the same methodology as the annual allocation (federal funding formula).

b) Please provide an explanation of why the funding levels were set so some transit agencies immediately drew down funding, but other agencies still have undispersed funding.

This question is posed in hindsight. It was unknown at that time of allocation exactly what financial burdens each agency would face, when they would face those burdens, and what respective strategies their leadership/boards would support for drawing down the funds. Each of the UA agencies relied on different local funding sources and have different governing bodies. Therefore, in 2020, the existing agreed upon allocation methodology was used. That being said, in 2021, the UA partners updated the agreement and included new provisions to incentive timely obligation and expenditure of funds. All recipients must report and certify unobligated and unexpended balances for all federal grant programs annually by March 1. Unobligated funds more than three years after appropriation and unexpended funds more than five years after appropriation will be removed from the subject transit system's current draft apportionment and redistributed to the other UA recipients.

c) Please provide an explanation of why Warren County was originally allocated CARES Act funding but ended up not receiving CARES Act funding. How did that decision align with the allocation methodology?

Warren County decided to decline CARES Act funding. This decision was made after the original allocation.

d) How has stimulus funding impacted each transit agency's ability to spend its regular formula funding?

With the exception of CTC, the other systems in the UA have continued to obligate and spend their formula funding in a timely manner. As noted above, CTC and the UA partners agreed to not allocate more formula funding to CTC in FFY24. CTC agreed to this approach/split in June 2024.

4) After CARES Act funding was provided to transit agencies, two further laws were enacted to provide additional assistance to transit agencies. CTC was originally allocated \$2,801,666 in CRRSAA funding and another \$5,055,027 in ARP funding even though its CARES Act grant to fund operations had a closeout milestone of December 31, 2025. CTC stated its desire to FTA and the Cincinnati transit agencies to use the CRRSAA and ARP funding for the construction of a new transit facility.

a) What methodology was used to allocate the stimulus funding (i.e., was it the same funding allocation methodology utilized for CRRSAA and ARP or different; if different please provide details)?

The allocation of stimulus funding followed the existing UA agreement and utilized the



same methodology as the annual allocation (federal funding formula).

- b) Did other transit agencies in the urbanized area not have a need to use CTS's CRRSAA and ARP funding for their own operations?**

This question is posed in hindsight. It was unknown at that time of allocation exactly what financial burdens each agency would face over the coming months and years, when they would face those burdens, and what respective strategies their leadership/boards would support for drawing down the funds. Each of the UA agencies relied on different local funding sources and have different governing bodies.

- c) With no further stimulus funding on the horizon, does OKI project a transit "fiscal cliff" in the urbanized area?**

Each system has very different fiscal profiles. There are certainly unique challenges based on local ridership, driver shortages, and local funding. TANK is proposing some service and fare changes in response to funding challenges. For SORTA, the agency passed a sales tax levy in 2020, has growing ridership (117% of pre-pandemic levels), has a solid 10-year operating plan that includes system growth (including two BRT corridors), and is not facing a fiscal cliff. We expect some ongoing challenges for MTS, BCRTA, CTC and WCTS regarding driver pay and availability but each seem to be well prepared to adjust business models as necessary.

- 5) Describe the planning process OKI utilizes to identify projects for the MTP and select transit projects from the MTP to incorporate into the TIP.**

- a) Page 2-8 of the TIP states that each transit agency in the urbanized area develops and executes its own TAM plan. The TAM final rule affords Tier II recipients (i.e., operators with less than revenue 100 vehicles across all fixed route modes) the opportunity to participate in a Group TAM Plan. Why have operators in Butler, Clermont and Warren counties elected not to participate in a Group TAM Plan?**

Those agencies in Butler (Butler County Regional Transit Authority), Clermont (Clermont Transportation Connection), and Warren (Warren County Transit Service) counties elected to develop their own TAM Plans, therefore, do not need to participate in the Tier II Group TAM Plan developed by OKI.

- b) What coordination takes place between the MPO and the individual transit agencies when the transit agencies share TAM and transit safety information to the MPO? For example, is there coordination on which projects to program into OKI's MTP and TIP? Does the MPO offer a regionwide perspective on what projects are being offered by the individual transit agencies?**

Asset management is closely related to system preservation, which is part of the OKI Project Prioritization Process. Safety is universally across modes also part of the OKI process. The agencies suggest projects for the MTP and TIP. OKI Staff apply the scoring process in both cases to arrive at a draft list of recommended projects. The public, the ICC and the Board of Directors determine the final recommendations. OKI staff relies on the transit agencies to know their system needs and bring forth projects most suitable



for them.

c) How do the respective TAM plans inform project prioritization in the TIP and MTP?

Asset management is reflected in the project prioritization process for all modes and is very similar for both the MTP and TIP. Points are awarded on a scale of 0 – 10 for facility type, ridership impact, impact on safety and security, existing asset physical condition, and geographic scope.

d) How does each transit agency's TAM plans inform OKI's targets in MTP and TIP?

OKI understands that maintaining the existing system will positively impact a range of metrics including state of good repair, safety and mobility. Collectively, consistent investment in good projects will improve the overall transit system. There is not a direct link to TAMs and targets beyond knowing that addressing asset management items will improve the probability of meeting the targets.

e) Please provide the latest metropolitan planning agreement between OKI and the individual transit agencies. If the document does not describe how information is shared between the MPO and transit agencies, please describe that separately.

The Memorandum of Agreement between OKI and each transit agency can be found in the appendix of the FY 2024 Unified Planning Work Program (UPWP) (<https://www.oki.org/wp-content/uploads/2024/09/FY24-UPWP-Final.pdf>), beginning on page 286. An updated MOU is underway by ODOT, working with OKI and the public transit agencies. FHWA and FTA have a copy of the draft. We expect this to be signed in the next several weeks or sooner.

f) For the MTP approved in June 2024, how does the MTP address transit performance measures and progress toward meeting transit targets? Please provide references to where transit asset management and transit safety performance measures and targets can be found on the MTP website.

Regional Public Transportation Performance Measures and Targets for both Tier I and Tier II can be found in the Impacts Section of the OKI 2050 MTP Update (<https://2050update.oki.org/supporting-performance-goals/>). In collaboration with Butler County Regional Transit Authority (BCRTA), Clermont Transportation Connection (CTC), Southwest Ohio Regional Transportation Agency (Metro), Transit Authority of Northern Kentucky (TANK), and Warren County Transit Service (WCTS), regional Tier I targets for rolling stock, equipment, facilities, and infrastructure were updated in 2022, as part of Resolution OKI 2022-23. Tier II targets for rolling stock and equipment were also updated in 2022, as part of the OKI Tier II Group TAM Plan (<https://www.oki.org/wp-content/uploads/2023/10/OKI-Group-TAM-September-2022.pdf>), which was also included in Resolution OKI 2022-23. Transit safety performance targets can be found in Chapter 2 of the FY 2024-2027 TIP (<https://www.oki.org/wp-content/uploads/2024/06/FINAL-OKI-FY24-27-TIP-6-13-24.pdf>).



- 6) Now that CTC has exchanged its CRRSAA and ARP funding to Butler County RTA (BCRTA) and SORTA for 5307 formula funding, the CTC transit facility is now in the OKI TIP (PID 118745).

- a) Describe the planning process employed to place this project on the TIP, including where in the planning process this project originated (e.g., CTC TAM plan, UPWP, MTP) and how the public was engaged based on OKI's Public Participation Plan.

Planning and Design funds for the CTC transit facility (PID 118745) were amended into the TIP by OKI Resolution on 2/9/23. Construction funds were amended into the TIP by OKI Resolution on 9/14/23. The Amendments followed OKI's Public Participation Plan procedures for TIP Amendments.

- b) Why is this project not listed on the "Recommended OKI 2050 MTP Update Project List"? The MTP Recommended Projects webpage states: "This list is exclusive of projects in the OKI Transportation Improvement Program (TIP)". What does that statement mean?

Typically, projects that are considered maintenance or maintain existing operations are not explicitly listed in OKI MTP. However, those projects are included as part of the fiscal constraint determination. The CTC facility provides a vehicle garage and office space. It does not have a significant impact on transit service. The "Recommended OKI 2050 MTP Update Project List" does not include projects, or project phases, that have committed funding in the OKI TIP. The TIP is included in the MTP by reference.

- c) What level of priority is this project rated in the CTC TAM plan?

CTC did not prioritize the project in their TAM plan. At that time the funds were still listed as stimulus funds, not 5307. CTC has indicated that the new facility will be a high priority in the TAM plan update.



APPENDIX D – PUBLIC COMMENTS

1. Comment from Metro Representative - COVID changed everything and expose transit issues and into the future. OKI has been very important helping transit. Ridership increased thanks to partnership with FTA Region 5 and OKI.
2. Comment from an attendee - the information received from OKI is tremendous as well as the partnership. OKI's traffic study on I-75 was noted as important for them.
3. FHWA asked if attendees have had opportunity to participate in OKI's planning processes.
 - Metro responded - Yes.
 - Another attendee complimented OKI and made an inquiry about speed limits.
4. Metro Representative added that OKI staff are positively amazing, providing extremely valuable data and information allowing for more efficient transit planning, and as a result they are now the 2nd largest provider in Ohio - thank you to OKI.
5. FHWA asked if anyone sits on OKI boards and experience.
 - Metro, yes. It's been amazing.
 - Other attendee - It's been a challenge to educate new members with turn overs.
 - Other attendee - yes, it's a fantastic experience. They sit on committees and Board. Changes in the Board can hurt consistency, but OKI does great bringing new members on.
6. Transit Authority of Northern Kentucky (TANK) Representative: OKI has been helpful in navigating the system, is stable, consistent, educating new staff, is a helpful and reliable resource.
7. Comment from an attendee - OKI is an amazing partner that helps with grants and has amazing staff. OKI also thinks regionally for every state.
8. FHWA asked if anyone else in room not on board or OKI staff.
 - North College Hill representative - Just getting familiar with process. Thank you to OKI - I am more enthusiastic after this meeting.
 - Engineering Firm representative - OKI has been amazing partner. OKI treats both sides of the river equally.
9. Metro Representative - Thank you again to OKI and for the help on College Hill rollout.
10. Comment from an attendee - stated they attend other meetings, boards and chamber of commerce meetings and OKI is always present and represents themselves well.
11. Metro Representative - Again, we love FTA Region 5.



APPENDIX E - LIST OF ACRONYMS

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





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