



**Federal Highway Administration**

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April 17, 2017

Commissioner Richard Blattner, Chair  
Broward Metropolitan Planning Organization  
100 West Cypress Creek Road, Suite 850  
Fort Lauderdale, FL 33309

Dear Commissioner Blattner,

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) are in receipt of the Broward Metropolitan Planning Organization's (MPO) email, dated September 19, 2016, which summarizes the actions taken by the MPO to satisfy the corrective actions of the 2015 Miami Urbanized Area Transportation Management Area (TMA) Certification Report noted below. To address those findings, the MPO proposed an amendment to the *Commitment 2040* Long Range Transportation Plan (LRTP) and the MPO Board subsequently adopted it on May 12, 2016. The MPO was asked to make additional changes to the LRTP to address more fully the second and third corrective actions. As a result of multiple discussions between the MPO and FHWA since then, the MPO modified the LRTP and submitted the modified Plan to FHWA for review on February 8, 2017 by email. The corrective action findings and how they were addressed by the MPO in the adopted LRTP amendment and additional modifications are described below:

- 1. Linking Planning and NEPA – Mitigation Strategies.** In accordance with 23 CFR 450.322 (f)(7) "A metropolitan transportation plan shall include, a discussion of types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the metropolitan transportation plan. The discussion may focus on policies, programs, or strategies, rather than at the project level. The discussion shall be developed in consultation with Federal, State, and Tribal land management, wildlife, and regulatory agencies. The MPO may establish reasonable timeframes for performing this consultation." While site visit discussions indicated mitigation strategies were considered, the Federal Review Team did not locate this information in the LRTP. **The MPO needs to modify the Commitment 2040 Long Range Transportation Plan to include a narrative regarding potential environmental mitigation activities that has been developed in consultation with Regulatory Agencies. This modification needs to be completed by or before May 30, 2016.**

The Broward MPO amended the *Commitment 2040* LRTP in May, 2016 to add narrative to describe the MPO's environmental mitigation strategies and policies followed during their LRTP development process. This amendment also added a discussion describing the MPO's work with partner regulatory agencies and included a map and a narrative describing the environmentally sensitive wetlands and forested uplands within the County that were considered during the plan development as well.

- 2. Long Range Transportation Plan - Project Phases.** In accordance with 23 CFR 420.322 (f)(10) the metropolitan transportation plan shall, at a minimum include, "A financial plan that demonstrates how the adopted transportation plan can be implemented." During the review of the MPO's 2040 Long Range Transportation Plan the Federal Review Team observed that the MPO's LRTP Cost Feasible table does not include project phase information for projects identified in the Cost Affordable Plan. As stated in the November 2012 letter on LRTP Expectations, revenues to support the costs associated with the work/phase must be demonstrated. For a project to be included in the cost feasible plan, an estimate of the cost and source of funding for each phase of the project being funded (including the Project Development and Environment (PD&E) phase) must be included. The phases to be shown in LRTPs include Preliminary Engineering, ROW and Construction (FHWA and FTA support the option of combining PD&E and Design phases into "Preliminary Engineering"). **The MPO needs to modify the Commitment 2040 Long Range Transportation Plan's Cost Affordable Plan tables to include this project detail. The modification to the Long Range Transportation Plan needs to be completed by May 30, 2016.**

The MPO amended the *Commitment 2040* LRTP to identify the phases being funded for all projects in the Cost Feasible Plan. This amendment was adopted by the MPO board at the May, 2016 MPO meeting. Upon Federal review of the amendment package submittal, it was noted that the project phase breakout for the Fiscal Years (FY) 2015-2018 was still needed. In November 2016, the MPO subsequently updated the Cost Affordable Plan to include those phase costs for the Capacity Improvement/Regionally Significant projects and has posted the modified *Commitment 2040* Plan on their website.

- 3. Long Range Transportation Plan - Financial Plan/Fiscal Constraint.** The Commitment 2040 Plan provides the often complex financial information in an easy to read format with infographics for the public and its partners. However, in translating this information to this new format, the importance of the first five (5) years of the Plan were moved to the back pages and delegated to essentially background or resource information. The project information, costs, and revenue information for the first five years of the Plan (2015-2019) were missing. Because of this missing information, the Federal Review Team could not determine if the Plan was fiscally constrained. As noted in 23 CFR 450.322(a) and discussed in the November 2012 FHWA/FTA LRTP development expectations letter, the LRTP must show projects and funding for the entire time period covered by the LRTP, from the base year to the horizon year. **An amendment to the LRTP that clearly demonstrates fiscal constraint of the entire plan must be adopted by the MPO Board by May 30, 2016.**

The May, 2016 amendment to the *Commitment 2040* LRTP updated the language and project tables in the Plan and referenced technical reports to include the current TIP and cost feasible projects from the base year to the horizon year, as requested. Upon Federal review of the amendment package submittal, we found additional information was needed and the MPO was asked to include clarifying language in the LRTP to show the full costs and revenues of the plan including the first five years of the TIP. The MPO completed this task in January 2017 and has posted the modified *Commitment 2040* Plan on their website. Fiscal constraint for the entire plan has been demonstrated with these changes.

Upon review of the adopted amendment and the subsequent modifications, the FHWA and FTA have determined that the changes made to the *Commitment 2040* LRTP successfully address the requirements of all the 2015 Miami Urbanized Area TMA Certification Corrective Actions for the Broward MPO. Therefore, FHWA and FTA jointly certify that the transportation planning process of the Miami Urbanized Area TMA, comprised in part by the Palm Beach MPO, substantially meets the federal planning requirements in 23 CFR 450 Subpart C. This certification remains in effect until August 2019.

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

Sincerely,



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

cc: Mr. Gregory Stuart, Broward MPO  
Mr. Keith Melton, FTA (Region 4)  
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