



SAFETEA-LU Gap Analysis and Closure Document

May 2007





The Northeast Ohio Areawide Coordinating Agency (NOACA) is a public Organization serving the counties of and municipalities & townships within Cuyahoga, Geauga, Lake, Lorain and Medina (covering an area with 2.1 million people). NOACA is the agency designated or recognized to perform the following functions:

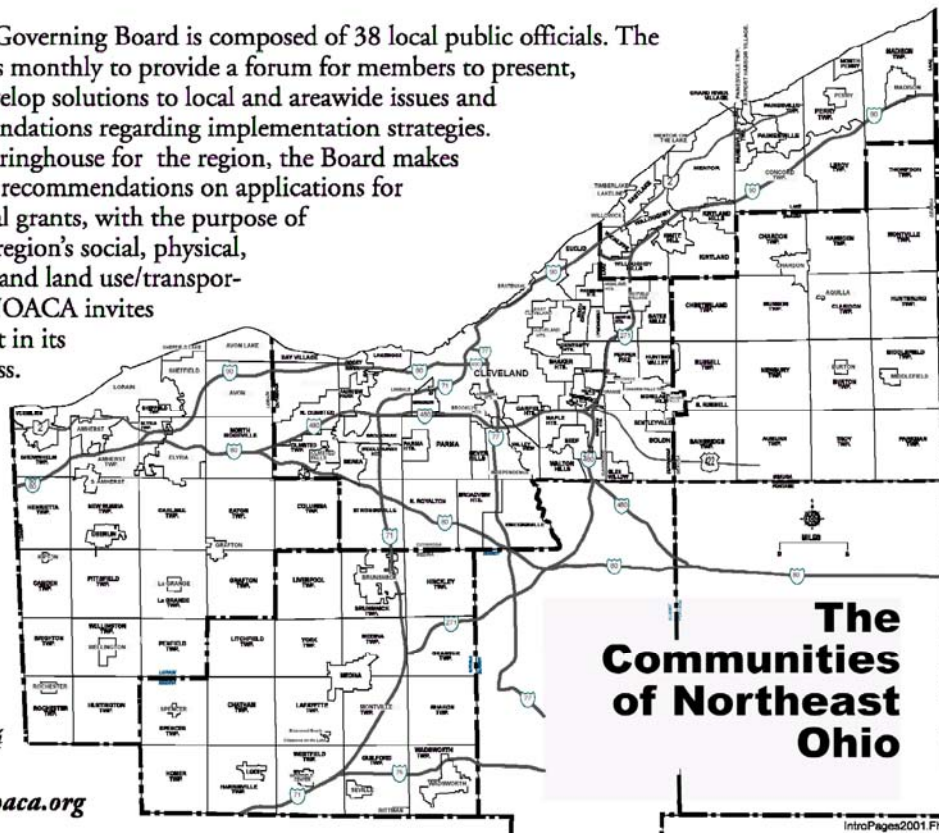
- **Serve as the Metropolitan Planning Organization (MPO), with responsibility for comprehensive cooperative and continuous planning for highways, public transit, and bikeways, as defined in the Transportation Equity Act for the 21st Century.**
- **Perform continuous water quality, transportation-related air quality and other environmental planning functions.**
- **Administer the area clearinghouse function, which includes providing local government with the opportunity to review a wide variety of local or state applications for federal funds.**
- **Conduct transportation and environmental planning and related demographic, economic and land use research.**
- **Serve as an information center for transportation and environmental and related planning.**
- **At NOACA Governing Board direction, provide transportation and environmental planning assistance to the 172 units of local, general purpose government.**

The NOACA Governing Board is composed of 38 local public officials. The Board convenes monthly to provide a forum for members to present, discuss and develop solutions to local and areawide issues and make recommendations regarding implementation strategies. As the area clearinghouse for the region, the Board makes comments and recommendations on applications for state and federal grants, with the purpose of enhancing the region's social, physical, environmental and land use/transportation fabric. NOACA invites you to take part in its planning process. Feel free to participate, to ask questions and to learn more about areawide planning. For more information, call:

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<p>1) Title & Subtitle Connections 2030: SAFETEA-LU Gap Analysis and Closure Document</p>	<p>2) NOACA Report No. TR-07-06</p>
<p>3) Author(s) Bill Davis</p>	<p>4) Report Date May 2007</p>
<p>5) Performing Organization Name & Address Northeast Ohio Areawide Coordinating Agency 1299 Superior Avenue, Cleveland, OH 44114-3204 Phone: (216) 241-2414 FAX: (216) 621-3024 Web site: www.noaca.org</p>	<p>6) Project Task No. (FY 2007) 6105-4</p>
	<p>7) NOACA Contract/Grant No. ODOT/FHWA</p>
<p>8) Sponsoring Agency Name & Address Ohio Department of Transportation 1980 W. Broad St., Box 899 Columbus, OH 43216-0899</p>	<p>9) Type of Report & Period Covered (July 1, 2007 – June 30, 2008)</p>
	<p>10) Sponsoring Agency Code</p>
<p>11) Supplementary Notes Federal funding for this project was provided by the Federal Highway Administration and administered by the Ohio Department of Transportation.</p>	
<p>12) Abstracts This document contains NOACA’s analysis of the impacts of SAFETEA-LU’s new planning requirements on its transportation planning practice and addresses how it has brought that planning practice into consistency with the new regulations.</p>	
<p>13) Key Words & Document Analysis A. Descriptors Long Range Transportation Plan, Connections 2030, SAFETEA-LU, Gap Analysis B. Identifiers/Open Ended Terms</p>	
<p>14) Availability Statement NOACA</p>	<p>15) No. Pages 20</p>
	<p>16) Price</p>

Connections 2030 SAFETEA-LU Gap Analysis and Closure Document

May 2007

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The preparation of this publication was financed through grants received from the Federal Highway Administration and the Ohio Department of Transportation and appropriations from the counties of and municipalities within Cuyahoga, Geauga, Lake, Lorain and Medina. The contents do not necessarily reflect official views or policies of the U.S. Department of Transportation or the Ohio Department of Transportation. This report does not constitute a standard or regulation.

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Connections 2030

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April 2007

Background

The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU, Public Law 109-59; 119 Stat. 1144) was approved on August 10, 2005. It replaced the Transportation Equity Act for the 21st Century (TEA-21) as the current transportation law. SAFETEA-LU made some significant changes in the requirements for developing federally fundable transportation plans, programs and projects.

The United States Department of Transportation (USDOT) has updated the metropolitan planning regulations (23 CFR 450 and 500, and 49 CFR 613) to be consistent with these revised requirements. This is the first significant update to those regulations since October 28, 1993.

One of the significant changes in the regulations is the move from a three year to a four year planning cycle for metropolitan area transportation plans. For the NOACA area, this would extend the life of its current plan, Connections 2030, to June 30, 2009. However, in order to take advantage of this extension, NOACA must make Connections 2030 compliant with the other changes in SAFETEA-LU by July 1, 2007. After a series of consultations between Ohio MPOs and ODOT, the MPOs are committed to making their transportation plans, their transportation improvement programs (TIPs) and the State Transportation Improvement Program (STIP) compliant with SAFETEA-LU by this deadline.

This document reports NOACA's staff analysis of its planning needs related to SAFETEA-LU and how it has met these needs in order to ensure compliance of Connections 2030 and the SFY 2008-2011 TIP with SAFETEA-LU.

GAP Analysis and Closure

NOACA staff reviewed SAFETEA-LU and USDOT's revised metropolitan planning regulations. It identified the new requirements contained in these documents, identified actions that were necessary to make NOACA's planning practice compliant with those requirements, and completed these actions in an effort to achieve compliance with them by July 1, 2007.

The following identifies NOACA's approach to making its current planning practice compliant, where it is not already compliant, with SAFETEA-LU.

1) Planning Cycle for Metropolitan Transportation Plan (23 USC 135/49 USC 5303(i)(1))

SAFETEA-LU changed the metropolitan transportation plan cycle from three to four years for areas in air quality nonattainment. NOACA is part of both ozone and fine particulate

nonattainment areas and must therefore submit a new metropolitan transportation plan every four years.

Connections 2030 became the region's current plan on July 1, 2005. The completion of the actions identified herein made Connections 2030 SAFETEA-LU compliant. As a result, NOACA's has until July 1, 2009 to adopt its next metropolitan transportation plan.

**2) Planning Cycle for Transportation Improvement Programs
(23 USC 134/49 USC 5303(j)(1)(D) and 23 USC 135/49 USC 5304(g)(1))**

SAFETEA-LU changes the Transportation Improvement Program (TIP) cycle from two to four years and requires a four year span for projects.

Based on coordination with ODOT and the other MPOs in the state, NOACA intends to continue producing a new TIP every two years. This is a result of consultations with the Ohio Department of Transportation (ODOT) that suggest that for fiscal management reasons it is a better timeline for STIP development. NOACA's TIP already includes a four year time span. NOACA has developed the SFY 2008-2011 TIP consistent with SAFETEA-LU's requirements. It intends to continue to do so with future TIPs. Therefore, this change does not represent a gap in NOACA's planning practice.

**3) Transportation Conformity Cycle
(23 USC 134(i)(3))**

SAFETEA-LU extends the conformity cycle to match the revisions in the plan cycle.

NOACA will continue to perform analyses as necessary to maintain transportation conformity. As a result, this change does not represent a gap in its planning practice.

**4) Scope of Annual Listing of Projects
(23 USC 134/49 USC 5303(j)(7)(B) and 23 USC 135/49 USC 5304(g)(4)(B))**

Annual listing of projects must include all bicycle/pedestrian projects in addition to roadway, transit and others for which Federal funds were obligated in the preceding program year.

NOACA's SFY 2008-2011 TIP includes a list of federal funded projects from the area that sold between May 5, 2005 and March 7, 2007. NOACA's lists have historically included bicycle and pedestrian projects that receive federal aid. NOACA's efforts are therefore compliant with the SAFETEA-LU requirement.

**5) Cooperation in Developing Annual Listing of Projects
(23 USC 134/49 USC 5303(j)(7)(B) and 23 USC 135/49 USC 5304(g)(4)(B))**

Annual listing should be developed cooperatively with other entities spending federal dollars in the region.

Ohio's MPOs, ODOT and FHWA/FTA have a well-developed coordination system for ensuring participation by all partners in their planning efforts. NOACA continued this long standing tradition of coordinating with its local elected officials, ODOT offices, transit agencies, FHWA/FTA, and the public in order to ensure the inclusion of all pertinent projects in the annual listing contained in the SFY 2008-2011 TIP.

**6) Scope of Planning Process - Safety
(23 USC 134.49 USC 5303(h)(1)(B) and 23 USC 135/49 USC 5304(d)(1)(B))**

SAFETEA-LU separated safety and security (a single factor in TEA-21) into stand alone factors. NOACA's planning process should consider projects that "increase the safety of the transportation system for motorized and non-motorized users." Guidance suggests that this includes the incorporation of the Strategic Highway Safety Plan (SHSP) into our metropolitan transportation plan.

Safety is already a priority in NOACA's transportation planning efforts. It includes evaluation of accident statistics and conducting safety studies for high risk intersections or corridors in its annual OWP efforts. It also maintains a congestion management process and utilizes it to aid in identifying at-risk corridors. Additionally, on November 29, 2006, NOACA hosted ODOT's Ohio Department of Public Safety's "Roadway Safety Workshop" at which ODOT shared its safety goals and discussed the state's Comprehensive Highway Safety Plan (CMHP).

NOACA incorporated the CMHP into Connections 2030 by reference in Governing Board Resolution 2007-017 which makes NOACA's practice fully consistent with the requirement.

**7) Scope of Planning Process - Security
(23 USC 134.49 USC 5303(h)(1)(C) and 23 USC 135/49 USC 5304(d)(1)(C))**

SAFETEA-LU separated safety and security (a single factor in TEA-21) into stand alone factors. NOACA's planning process should consider projects that "increase the security of the transportation system for motorized and non-motorized users." Guidance suggests that this includes the incorporation of the transit system security program (TSSP) into our metropolitan transportation plan.

The NOACA area contains many critical structures from a transportation security perspective. The region contains several deep valleys (e.g the Cuyahoga River valley) that result in long bridge expanses at high levels. Damage to any of these structures would result in significant transportation delays and costs for repair and/or replacement.

Additionally, the region's mass transit systems, particularly its rail lines, could either be disrupted by security threats and/or may be necessary services in the event of the need to implement an evacuation plan. NOACA is coordinating with the region's transit agencies to ensure that their security needs are accounted for to the fullest extent practicable within its planning process.

The region also is an intermodal hub for truck, rail, shipping, and airborne commerce. The identification of intermodal transfer points and the assessment of how they fit into our transportation system is a renewed priority in NOACA's planning efforts. NOACA will do whatever it can to consider intermodal security concerns in its planning efforts.

Finally, the region contains several major and some minor airports with their associated security concerns. NOACA has been a minor participant in the region's homeland security efforts and will do whatever is within its ability to address airport security concerns where they intersect with its planning efforts.

At this time there is not a transit system security program (TSSP) in place. NOACA will incorporate any such program into its planning efforts as it becomes available. NOACA believes its current project planning and review processes allow it to be consistent with the intents of SAFETEA-LU on the issue of transportation security.

**8) Scope of Planning Process – Environment
(23 USC 134.49 USC 5303(h)(1)(E) and 23 USC 135/49 USC 5304(d)(1)(E))**

SAFETEA-LU expanded this factor description to state that metropolitan planning processes should consider projects that “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. Note that the major change here is the addition of planned growth and development patterns to the mix.

Connections 2030 does not explicitly compare projects in it with local planned growth and economic development patterns. In fact, few if any political subdivisions in Northeast Ohio have adopted growth or development plans that would allow for that comparison. Several of NOACA's goals do address the importance that planned transportation projects promote consistency with these local efforts. Community short and long term goals are considered during the project planning review process and throughout the project selection and identification process. NOACA will continue to promote consistency during project identification and development and believes these efforts are compliant with SAFETEA-LU's intent.

**9) Environmental Mitigation (general)
(23 USC 134/49 USC 5303(i)(2)(B) and 23 USC 135/49 USC 5304(f)(4))**

SAFETEA-LU requires that we “include a textual discussion 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 plan.” Guidance suggests comparing plan with available state conservation plans, maps, and inventories.

NOACA has mapped its SFY 2008-2011 Transportation Improvement Program against the environmental resource layers compiled by the Ohio Department of Transportation.

Attachment A includes a low resolution example of one of these maps. Generally speaking, water and water related resources (e.g. wetlands) are the most likely issues to require attention during project planning for virtually every project in the region. The majority of the NOACA region is part of the glacial till plain which is dominated by water features. NOACA has been involved in efforts to protect its aquatic resources for many years. Most recently, it has formed a Transportation Water/Quality Council to focus specifically how to improve transportation outcomes related to aquatic resources.

The region has many national, state, and local park areas that are similarly involved in efforts to protect and acquire significant resource areas. There are also a number of conservancy efforts in place with the goal of preserving critical land areas. NOACA participates directly with these efforts through some of its committee structures.

Additionally, NOACA's committee structure which includes several committees committed to environmental concerns (Environmental Advisory Committee, Water Quality Subcommittee, Air Quality Subcommittee, and the Transportation/Water Quality Council) provide ample opportunities for discussion and review of these issues during project planning.

Beyond NOACA's efforts, ODOT has well established mitigation efforts as part of its project development process. The following excerpt provided by the ODOT Department of Environmental Services provides its description of these mitigation efforts:

"ODOT strives to avoid, to the fullest extent practicable, any activity that adversely impacts streams or wetlands during the design, construction, or maintenance of the state transportation system. ODOT takes appropriate action throughout the project development process to avoid, minimize, and mitigate impacts as required by federal, state, and local law. In the event that impacts to streams and wetlands are unavoidable, ODOT considers a wide variety of mitigation strategies, which always begins with evaluation of on-site opportunities (e.g natural channel design techniques, bankfull culverts, wetland creation, etc.) within the project work area. Once the on-site (within the project area) resources are exhausted, the search for mitigation opportunities may shift to on-site, within one mile of the project area, followed by a search within a specific 8 Digit Hydrological Unit Code (HUC) watershed. Mitigation opportunities may include mitigation banking, stream and wetland creation, restoration, and/or preservation, and possibly even preservation of upland buffer adjacent to stream and wetland resources.

"Impact analysis and mitigation are integral parts of the project development process. Early review and analysis of project alternatives by regulatory and resource agencies combined with effective inter-office coordination are required to develop successful transportation projects.

"ODOT follows guidelines for the development of mitigation as required by the U.S. Army Corps of Engineers (USACE) and Ohio Environmental Protection Agency (OEPA). The USACE mitigation guidelines are outlined in the latest

USACE Regulatory Guidance Letter (RGL) 02-02, dated December 24, 2002. This guidance can be located in Appendix T. Ohio EPA has specific guidelines for wetland mitigation which is included in the Ohio Administrative Code Sections 3745-1-50 through 3745-1-54, "The Wetland Water Quality Standards." Although mitigation is now being required for unavoidable impacts to streams there are currently no formal rules in Ohio. Stream mitigation for ODOT projects is being accomplished on a case-by-case basis and is negotiated with OEPA and USACE by OES through the pre-application/coordination and waterway permit processes.

"Development of Mitigation Projects:

"ODOT's general procedure for securing required mitigation for stream and wetland impacts includes:

"A. Determination of mitigation needs. The Ecological Survey Report (ESR) documents these potential project impacts.

"B. Analyze potential mitigation opportunities within the project area and/or close proximity (one mile) or within a specific 8 Digit Hydrological Unit Code (HUC) watershed (See Appendix O for 8 Digit HUC Watershed Map) where the impacts are anticipated to occur. This may require a partnership between ODOT and various organizations or individuals such as a watershed groups, conservation groups, a local park districts, the Ohio Department of Natural Resources, or even a private landowner to secure appropriate mitigation.

"C. Develop preferred plan of action for mitigation

- Select mitigation site(s); [on-site, off-site, or mitigation banks*
- Provide funds to partnering organization for mitigation projects*
- Pursue conservation easements*

"D. Develop conceptual mitigation plan/report.

"E. Coordinate conceptual mitigation plan/report with resource and regulatory agencies.

"F. Submit approved conceptual mitigation plan/report with waterway permit applications.

"G. Develop final mitigation plan, for submission to agencies prior to permit authorization.

- Develop construction plans*
- Procure conservation easements*
- Provide funds to partnering agencies*
- Procure credits at Mitigation Banks*

“H. Construct Mitigation Project.

“I. Monitor Mitigation Project. ODOT performs post construction monitoring on all mitigation sites for a minimum of 5 years to assure successful development and to meet waterway permit conditions.

“ODOT-Office of Environmental Services in cooperation with ODOT Districts, the ODOT- Office of Real Estate, the ODOT- Office of Aerial Engineering, and project consultants coordinate to develop all stream and wetland mitigation projects.”

NOACA staff believes these efforts make its planning practice consistent with SAFETEA-LU’s requirements.

**10) Environmental Mitigation (consultation)
(23 USC 134/49 USC 5303(i)(2)(B) and 23 USC 135/49 USC 5304(f)(4))**

SAFETEA-LU states that the discussion described in (9) above “shall be developed in consultation with Federal, State, and tribal wildlife, land management, and regulatory agencies. Guidance suggests that this list should include environmental protection and historic preservation agencies as well. Guidance also suggests that we could refer to the procedure used to consult with these agencies.

In addition to the existing committee structure identified above, NOACA updated its public interaction policy in December of 2005 to make it consistent with SAFETEA-LU. This included the addition of consultation to the agency’s Intergovernmental Review Process. Formerly known as the IGR process, it is now referred to as the IGRC process to reflect the incorporation of consultation. This effort allows for consultation with the interested parties and incorporation of their plans within our efforts where intersections occur. For example, NOACA has been actively involved in discussions with several groups related to the use of the former canal towpath for a variety of transportation related uses. The Cuyahoga Valley National Recreational Area (CVNRA) and the National Park Service are interested in extending rail service along their existing rail line to Lake Erie. They have presented these plans to NOACA’s Transportation Advisory Committee, and NOACA will continue to coordinate with them as they pursue making these plans a reality.

NOACA is also pursuing further improvements in these consultation efforts through its development of a public participation plan. See (14) below.

NOACA will formally incorporate the revised Public Interaction Policy into Connections 2030 by reference in the Governing Board Resolution adopting the necessary amendments to that document.

11) Operational and Management Strategies for Existing Transportation Facilities 23 USC 134/49 USC 5303(i)(2)(D)

SAFETEA-LU in numerous locations requires “Operational and management strategies to improve the performance of existing transportation facilities to relieve vehicular congestion and maximize the safety and mobility of people and goods.” There appears to be room for both direct inclusions of these strategies in the plan and also their incorporation by reference into it from standalone documents.

NOACA’s transportation planning process is already consistent with this requirement. A review of the Goals and Strategies (Chapter III) from Connections 2030 as well as the more detailed discussion of the various systems (Chapter IV) readily demonstrate that NOACA is focused on the operation and performance of the region’s existing transportation facilities.

Additionally, a review of the expenditure of NOACA attributable funds in the area easily demonstrates that its funding resources are dedicated to these concerns.

Finally, during 2007 NOACA established an Asset Management Council (AMC). Among other tasks, the AMC is to:

- o Proactively work and coordinate with communities and agencies regarding the development and selection of projects that will help to achieve Board-approved pavement management benchmarks.*
- o Every two years (to coincide with the development of the Transportation Improvement Program (TIP); develop a recommended list of projects to be programmed. Multiple scenarios should be developed to account for changing financial and project planning circumstances. The multiple scenarios are to be delivered to the Regional Transportation Investment Subcommittee (RTIS) and the TAC.*

12) Congestion Management Process (23 USC 134/49 USC 5303(k)(3))

SAFETEA-LU takes a broader process based view of the former congestion management system requirements. Most of the changes appear to be in coordination with partners in these efforts.

NOACA’s Congestion Management System (CMS) is already a process. The first CMS Manual of Practice defining this process was adopted in October 1997 via Governing Board Resolution 97-077. In the second edition of this manual which was published in September 2002, the executive summary contains the following sentence which highlights NOACA’s view of this effort as process oriented long before the SAFETEA-LU requirement: “The Congestion Management System (CMS) provides for a systematic process to address traffic congestion on the region’s transportation network.” It further describes the CMS by stating:

“Because a CMS could mean different things to different people, and because the development, establishment and implementation of a CMS is not only intricate but

also large in scope, a manual of practice to help achieve the establishment and implementation of a CMS became necessary. The manual represents the blueprint upon which the construction of a CMS will be based. It contains NOACA's goals and objectives, the criteria for defining the transportation network, specific congestion management and mobility enhancement strategies, and measures of performance for evaluating the transportation system. Future expansion of or modification to the CMS will be necessary as new information and technology become available. Therefore, the CMS manual of practice will be a dynamic document."

NOACA uses the processes described in the manual to evaluate not only its current but future road networks in: CMS Volume-to-Capacity Ratio Evaluation (June 2003); Existing Traffic Congestion in the NOACA Region (September 2004); and Future Traffic Congestion in the NOACA Region (September 2005). The needs identified by these evaluations feed directly into NOACA's efforts with project sponsors to promote projects addressing solutions to the most congested locations. Additionally the process provides input into regional planning efforts through, among other things, NOACA's Project Planning Review process. That is, in selecting projects for the plan, the Governing Board considers congestion performance measures in relationship to NOACA's goals.

NOACA formally renamed the CMS as a congestion management process in Governing Board Resolution 2007-017 which makes NOACA's practice fully consistent with the requirement.

13) State Air Quality Planning Coordination (23 USC 135/49 USC 5304(g)(4)(D)(iii))

SAFETEA-LU requires that our transportation planning efforts seek consultation from state and local air quality planning agencies in nonattainment and maintenance areas. It specifically states that "in metropolitan areas which are in nonattainment for ozone or carbon monoxide under the Clean Air Act, the metropolitan planning organization shall coordinate the development of a transportation plan with the process for development of the transportation control measures of the State implementation plan required by the Clean Air Act.

NOACA does not believe that these requirements represent a gap in its planning effort. NOACA has been a direct participant in the development of the State Implementation Plans (SIPs) for its area for many years. Both the transportation planning effort and the SIP planning efforts have influenced each other during those years. Several memorandums of understanding have been developed between the nonattainment area MPOs, ODOT and Ohio EPA related to these coordination efforts.

14) Participation by Interested Parties

(23 USC 134/49 USC 5303(i)(5), (i)(6), and (j)(4) and 23 USC 135/49 USC 5304(f)(3) and (g)(3))

SAFETEA-LU requires a separate stand-alone plan for collecting public comments on its planning efforts. The section contains a requirement that “a participation plan—
“(i) shall be developed in consultation with all interested parties; and
“(ii) shall provide that all interested parties have reasonable opportunities to comment on the contents of the transportation plan.”

It also requires that “to the maximum extent practicable— “(i) hold any public meetings at convenient and accessible locations and times;
“(ii) employ visualization techniques to describe plans; and
“(iii) make public information available in electronically accessible format and means, such as the World Wide Web, as appropriate to afford reasonable opportunity for consideration of public information.”

NOACA developed a participation plan compliant with these requirements for its transportation planning efforts related to this analysis, the SFY 2008-2011 TIP, and the SFY 2008 Overall Work Program. It will continue to update and amend this plan as necessary in response to feedback from interested parties about its effectiveness in meeting their participation needs. NOACA believes this effort makes it compliant with this requirement.

15) Coordinated Public Transit Human Services Transportation Plans

SAFETEA-LU requires a written plan for agencies that will receive funding for transit programs serving the disadvantaged.

NOACA sought and received Board authorization (Resolution 2006-043) to pursue designation as the recipient of Job Access Reverse Commute (JARC) and New Freedom monies for distribution of funds to eligible transit projects in the Cleveland urbanized area. It also hired staff to develop the required plans for the distribution of those funds. Those plans were adopted in conjunction with other materials pursuant to this SAFETEA-LU update. These efforts make NOACA’s planning practice compliant with this requirement.

16) Visualization Techniques

23 USC 134/49 USC 5303(i)(5)(C)(ii), and 49 USC 5304(f)(3)(B)(ii)

SAFETEA-LU requires visualization techniques to be used in the development of transportation plans and TIPs.

NOACA has always sought to use visualizations in an effort to provide better opportunities for communication with its committees and the public. Among these are:

- 1) *NOACA mapped its entire TIP in ARCMAP utilizing ODOT's LRS system and project data related to that system.*
- 2) *It pursued and is beginning to implement a web based pavement management system tool that will not only allow internal staff but external transportation planners to visualize pavement conditions in their jurisdictions and used as tool to prioritize work based on that data.*
- 3) *It uses mapping to highlight congested areas and to aid in planning fixes for those areas.*
- 4) *It has used GIS based mapping for over a decade to aid in the identification of environmental justice and other special populations.*
- 5) *Uses PowerPoint presentations containing charts, diagrams, and maps to explain planning efforts, requirements and other information to committees and the public.*
- 6) *Sub area mapping is often used (particularly related to environmental efforts) to aid and inform discussions at committees and task forces.*
- 7) *Completes user friendly versions of complex documents so that they are more attractive and accessible to the general public.*
- 8) *Operates an air quality website that allows for near real-time views of the ambient air conditions in the region.*

NOACA will continue to aggressively pursue GIS-based options for providing increased opportunities for public input and feedback. ARCIMS options initially explored for the pavement management system may allow for a much stronger presence for many of NOACA's mapping materials on its website. Because of these efforts and many more like them, NOACA believes its current efforts are compliant with this requirement.

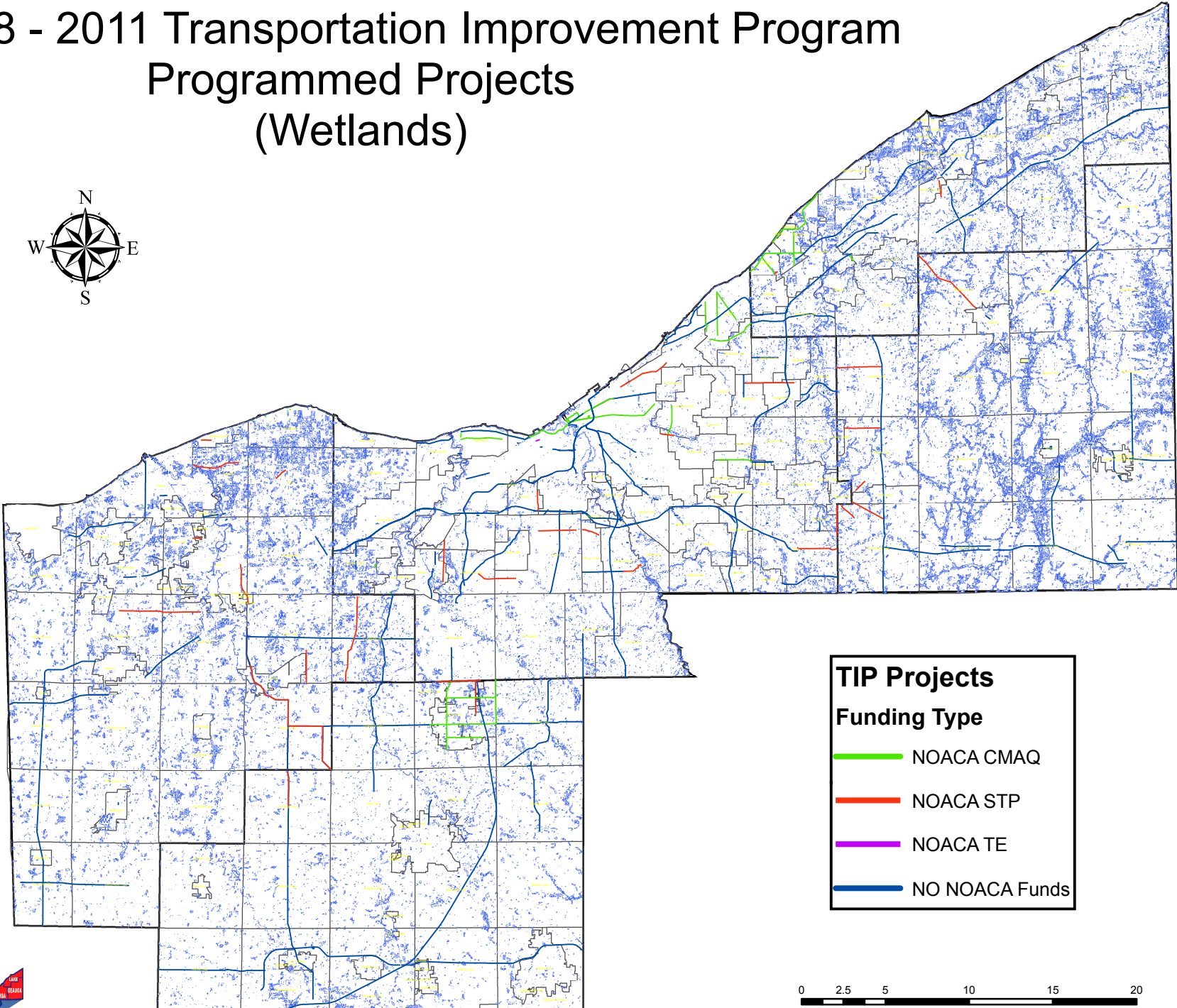
The table on the following pages summarizes this discussion.

SAFETEA-LU Revisions to Metropolitan Planning Requirements that Produce Potential Gaps in Planning Practice

SAFETEA-LU Requirement	GAP?	Closed?	Explanation / Closure Steps
1. Metropolitan transportation plan cycle changed to four years in nonattainment areas.	Yes	Yes	NOACA has completed the necessary plan revisions to eliminate this gap.
2. Metropolitan transportation improvement program cycle changed from two years to four years.	No		NOACA will continue to produce TIPs every two years. Every other TIP will be in conjunction with a transportation plan update.
3. Transportation conformity cycle extended to match plan and program cycles.	No		NOACA will continue to conduct conformity analyses as necessary to accommodate plans, and plan amendments within the eight county ozone nonattainment area and the fine particulate matter nonattainment area.
4. Scope of annual listing of projects changed to explicitly include all bicycle/pedestrian projects in addition to roadway, transit, and others for which federal funds were obligated in the previous year.	No		NOACA has published a biennial list in conjunction with its TIP that covers all of the mentioned projects. It will publish this list annually in order to comply with this requirement.
5. Annual listing of projects should be developed cooperatively with other entities spending federal dollars in the region.	No		NOACA already develops these lists through extensive coordination with other recipients of federal funds in the region.
6. SAFETEA-LU separates safety and security into stand alone factors. Planning process should consider projects that “increase the safety of the transportation system for motorized and non-motorized users.” The state’s Strategic Highway Safety Plan (SHSP) should be incorporated into the metropolitan transportation plan.	Yes	Yes	The Governing Board resolution for the gap closure document(s) will incorporate the State Highway Safety Plan into Connections 2030.
7. Planning process should consider projects that “increase the security of the transportation system for motorized and non-motorized users.” The state’s Transit System Security Program (TSSP) should be incorporated into the metropolitan transportation plan.	Yes	Yes	General discussion of critical transportation structures in the area drafted. Coordinating with transit agencies regarding how to incorporate their security concerns into our planning efforts.
8. Planning process should consider projects that “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.”	No		NOACA principles and goals already address these issues. They are considered during our PPR and IGRC efforts. NOACA will continue to consider these issues during project identification and development and believes these efforts are compliant with SAFETEA-LU’s intent.
9. Plan should “include a textual discussion 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 environmental functions affected by the plan.	Yes	Yes	Mapped SFY 2008-2011 TIP against environmental resource layers. Drafted generalized discussion of likely mitigation needs and the institutions with which project sponsors can work to achieve mitigation.
10. Environmental mitigation discussion should be “developed in consultation with federal, state, and tribal wildlife, land management, and regulatory agencies.” Environmental protection and historic preservation agencies should be included as well.	Yes	Yes	Discussed the IGRC process and an example of how it promotes our coordination with these organizations. Incorporated revised Public Interaction Policy into Connections 2030.
11. Plan should give priority to “operational and management strategies to improve the performance of existing transportation facilities to relieve vehicular congestion and maximize the safety and mobility of people and goods.”	No		NOACA has made these issues a priority for many years.

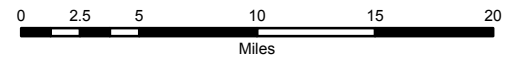
SAFETEA-LU Requirement	GAP?	Closed?	Explanation / Closure Steps
12. Congestion Management Systems are to descend out of broader based congestion management processes.	No		NOACA's RTS and CMS efforts already constitute a process. Rename CMS in conjunction with the gap update.
13. Transportation planning efforts must be coordinated with state air quality planning efforts.	No		NOACA is a key participant in the state's air quality planning efforts and participates directly in the selection of transportation control measures for the SIP.
14. A stand-alone public participation plan is required that is developed in consultation with all interested parties, provides for all interested parties to have sufficient opportunities for comment on the transportation plan, employs visualization techniques, and makes information electronically accessible as appropriate to afford reasonable opportunity for public consideration.	Yes	Yes	NOACA has developed this plan.
15. SAFETEA-LU requires a written "Coordinated Public Transit Human Services Transportation Plan" for agencies that will receive funding for transit programs serving the disadvantaged.	Yes	Yes	NOACA sought and received the designation to be the Job Access and Reverse Commute (JARC) and New Freedom monies recipient and distributor to eligible transit projects in the Cleveland urbanized area. It hired staff to develop the plans necessary to ensure appropriate distribution of these funds and will be incorporating those plans into Connections 2030.
16. Visualization Techniques SAFETEA-LU requires the use of visualization techniques in the development of plans and TIPS.	No		NOACA already uses visualization techniques as much as possible and is always pursuing new methods to improve communication.

SFY 2008 - 2011 Transportation Improvement Program Programmed Projects (Wetlands)



TIP Projects
Funding Type

- NOACA CMAQ
- NOACA STP
- NOACA TE
- NO NOACA Funds



Appendix

Resolution No. 2007-017 SAFETEA-LU Gap Analysis and Closure Document

**RESOLUTION NO. 2007-017
(SAFETEA-LU GAP ANALYSIS
AND CLOSURE DOCUMENT)**

**RESOLUTION OF THE GOVERNING BOARD
OF THE
NORTHEAST OHIO AREAWIDE COORDINATING AGENCY**

WHEREAS, the Northeast Ohio Areawide Coordinating Agency (NOACA) is the Metropolitan Planning Organization (MPO) for the counties of Cuyahoga, Geauga, Lake, Lorain, and Medina; and

WHEREAS, NOACA is responsible for conducting federally mandated metropolitan transportation planning activities in its region; and

WHEREAS, on August 10, 2005 the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) replaced the Transportation Equity Act for the 21st Century (TEA-21) as the current transportation law; and

WHEREAS, SAFETEA-LU includes revisions to the metropolitan transportation planning process (23 USC 134 and 49 USC 5303); and

WHEREAS, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) promulgated revisions to the Metropolitan Transportation Planning regulations (23 CFR Parts 450 and 500, and 49 CFR Part 613) which parallel the revisions in SAFETEA-LU and which became effective March 16, 2007; and

WHEREAS, NOACA can align its long range transportation plan and transportation improvement program planning cycles by making its current plan, Connections 2030, and its SFY 2008-2011 Transportation Improvement Program consistent with these revised requirements by July 1, 2007; and

WHEREAS, NOACA's transportation planning efforts must be compliant with these revisions after July 1, 2007; and

WHEREAS, NOACA staff compared its existing planning practice with the required revisions and identified any potential areas for gaps between its practice and those revisions; and

WHEREAS, NOACA staff identified the actions necessary to make its planning practice compliant with SAFETEA-LU and accomplished those actions; and

WHEREAS, NOACA developed its SFY 2008-2011 Transportation Improvement Program consistent with Connections 2030 and the revised regulations; and

WHEREAS, the Connections 2030: SAFETEA-LU Gap Analysis and Closure Document details these efforts; and

WHEREAS, NOACA has developed and adopted the participation plan required by SAFETEA-LU; and

**RESOLUTION NO. 2007-017
(SAFETEA-LU GAP ANALYSIS
AND CLOSURE DOCUMENT)**

- 2 -

WHEREAS, NOACA is developing the “Coordinated Public Transit Human Services Transportation Plan” required by SAFETEA-LU; and

WHEREAS, the Transportation Advisory Committee has recommended Governing Board approval of the Connections 2030: SAFETEA-LU Gap Analysis and Closure Document.

NOW, THEREFORE, BE IT RESOLVED by the Governing Board of the Northeast Ohio Areawide Coordinating Agency, consisting of thirty-eight principal elected and other officials of general purpose local government throughout and within the Counties of Cuyahoga, Geauga, Lake, Lorain, and Medina, that:

Section 1: Connections 2030: SAFETEA-LU GAP Analysis and Closure Document (the document) is adopted as an amendment to Connections 2030: A Framework for the 2030 Transportation System (June 2005).

Section 2: Staff is authorized to make any additional revisions to the document necessitated by comments from FHWA and/or FTA to ensure compliance with SAFETEA-LU’s requirements and will report on any such comments and changes to the Governing Board.

Section 3: Ohio’s State Highway Safety Plan is amended by reference to Connections 2030 and NOACA will continue its efforts to support Ohio’s transportation safety goals.

Section 4: Existing transit agency security plans are amended by reference to Connections 2030 and NOACA will continue its efforts to support transit security initiatives in its region.

Section 5: The Executive Director is hereby authorized to transmit a certified copy of this resolution and supporting documentation to appropriate Federal, State, and local agencies.

Certified to be a true copy of a Resolution of the Governing Board of Northeast Ohio Areawide Coordinating Agency adopted this 11th day of May, 2007.

Secretary:  _____

Date Signed: 5-10-07 _____