



U.S. Department  
of Transportation

**Federal Highway  
Administration**

**Federal Transit Administration**

November 27th, 2019

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St. Paul, MN 55101-4802

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Chicago, IL 60606-5253

Margaret Anderson Kelliher  
Commissioner of Transportation  
Minnesota Department of Transportation  
MS 100, Transportation Building  
St. Paul, Minnesota 55155

Subject: Approval of Minnesota's FY 2020 – 2023 STIP and FHWA/FTA Statewide Planning Finding

Dear Commissioner Kelliher:

The following letter is in response to the Minnesota Department of Transportation's (MnDOT) transmittal of the Fiscal Year (FY) 2020 – 2023 Statewide Transportation Improvement Program (STIP) requesting approval.

To approve the subject STIP document, including the Transportation Improvement Programs (TIPs) contained therein, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must determine the STIP is based on a continuing, cooperative and comprehensive planning process. This is achieved by examining the STIP and associated TIP documents, statewide and metropolitan planning self-certification statements (23 CFR 450.220; 23 CFR 450.336), related supported documentation, and regular ongoing involvement with MnDOT and the Metropolitan Planning Organizations (MPOs).

In addition, under 23 CFR 450.220(b), the FHWA and FTA are required to document and issue a Federal Planning Finding in conjunction with the STIP approval. The Federal Planning Finding verifies, at a minimum, that the development of the STIP is consistent with the provisions of both the statewide and metropolitan transportation planning requirements of 23 U.S.C. 234, 135; 49 U.S.C. 5303-5305; 23 CFR parts 450 and 500, and 49 CFR part 613.

The complete FY 2020 – 2023 Federal Planning Finding is attached to this document. The following is a summary of the Findings contained therein:

#### **Commendations**

- Planning and Environmental Linkages (PEL) Studies – TH 47/65 and TH 120
- MnDOT Public Engagement Website Enhancement
- Metropolitan Council 2020 – 2021 UPWP
- MnDOT District Freight Plans

#### **Recommendations**

- MnDOT Project Coordination with MPOs
- Projects and Corridor Visioning (Managing Access to Maintain Mobility)
- Congestion Management Process (CMP) Integration into the Regional Solicitation

### **Corrective Actions**

There are no Corrective Actions included with the 2020-2023 STIP Federal Planning Finding.

Accordingly, we find that the FY 2020 – 2023 STIP is based on a transportation planning process that substantially meets the requirements of 23 U.S.C. Sections 134 and 135, U.S.C. Sections 5303-5304, 23 CFR 450 (Subparts B and C), and 49 CFR Part 613 (Subparts B and C).

This approval includes the corresponding individual MPO TIPs that comprise the STIP, as well as approval of a joint FHWA/FTA air quality conformity determination for the Metropolitan Council's TIP pursuant to 40 CFR 93 (transportation conformity regulations).

Approval of the FY 2020 – 2023 STIP is not to be construed as a federal-aid eligibility determination. Each project must satisfy the specific requirements of the program from which federal funds are requested, as well as other federal requirements as appropriate before funds are authorized.

FHWA and FTA value MnDOT's sustained efforts to ensure a cooperative, continuous, and comprehensive planning process. We recognize the complexity of assembling a STIP and the effort expended by MnDOT staff. FHWA also appreciates the patience exercised by MnDOT as the transition to the new Federal Planning Finding requirements occurred.

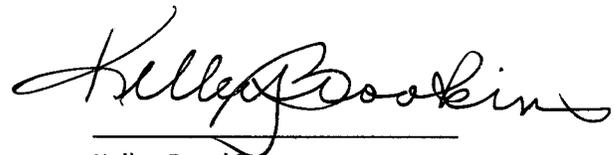
We look forward to working with MnDOT to advance the projects and programs in the STIP, and continuing to provide the traveling public with an efficient, high-quality transportation system.

Should you have any questions regarding this STIP approval and Federal Planning Finding, please contact Andrew Emanuele, FHWA Community Planner at (651) 291-6124, or Bill Wheeler, FTA Community Planner at (312) 353-2639.

Sincerely,

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Wendall L. Meyer  
Division Administrator  
Federal Highway Administration



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Kelley Brookins  
Regional Administrator  
Federal Transit Administration

**Attachment**

cc:

Trang Chu (MnDOT)  
Brian Gage (MnDOT)  
Ed Idzorek (MnDOT)  
Roberta Retzlaff (MnDOT)  
Kris Riesenber (FHWA)

## ATTACHMENT 1

# **2019 Federal Highway Administration and Federal Transit Administration Minnesota Statewide and Metropolitan Planning Finding for the FY 2020 – 2023 Statewide Transportation Improvement Program**

## **Overview**

The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) are required under 23 CFR 450.220(b) to document and issue a Federal Planning Finding (FPF) in conjunction with approval of the Statewide Transportation Improvement Program (STIP).

The FPF verifies, at a minimum, that the development of the STIP is consistent with the provisions of both the Statewide and Metropolitan transportation planning requirements of 23 U.S.C. 134, 135; 49 U.S.C. 5303-5305; 23 CFR parts 450 and 500, and 49 CFR part 613.

This report substantiates the issuance of the FHWA/FTA Federal Planning Finding to support FHWA/FTA approval of the STIP based on the review of STIP and TIP documents, statewide and metropolitan planning self-certification statements (23 CFR 450.220; 23 CFR 450.336), and related supporting documentation.

The FPF is the key oversight mechanism through which FHWA and FTA ensure that the transportation planning processes in Minnesota meets federal requirements. The FPF was conducted in a risk-based capacity; the highest priority was placed in matters with the greatest potential to impede compliance with federal planning requirements. The Findings were determined through an in-depth desk review, risk tracking, an assessment of previous Findings, day-to-day interaction with MnDOT and the MPOs, and MnDOT feedback.

## **Background**

The Findings contained herein fall into one of three categories: Commendation, Recommendation, or Corrective Action. The categories are defined as follows:

**Commendations:** Planning activities that demonstrate innovative, highly effective, well-thought-out procedures for implementing the planning requirements or represent a national model for implementation and can be cited as an example for others.

**Recommendations:** Items that meet the statutory and regulatory requirements, but may contain opportunities to improve the transportation planning process.

**Corrective Actions:** Items that do not meet statutory and regulatory requirements. Corrective Actions require a work plan detailing how the issue will be resolved and by when.

## **Findings**

## **Commendations**

### **Commendation #1: Planning and Environmental Linkages Studies – TH 47/65 and TH 120**

Observation: FHWA encourages the use of Planning and Environmental Linkages (PEL) to streamline the planning process into NEPA, implementing corridor needs with more efficiency and cost-effectiveness. Following the success of the Trunk Highway (TH) 65 PEL pilot project, MnDOT Metro District has introduced two new PEL studies: TH 47/65 and TH 120. Incorporating lessons from TH 65, these studies will utilize PEL techniques with a context-specific approach to their corridors.

Finding: MnDOT Metro is commended for maturing and expanding PEL with the TH 47/65 and TH 120 studies. This not only advances the PEL process in Minnesota, but addresses the joint MnDOT/FHWA risk on PEL implementation.

### **Commendation #2: MnDOT Public Engagement Website Enhancements**

Observation: Public Engagement is integral for the development of transportation plans and projects; it builds essential support and “buy-in” for activities undertaken, reducing potential controversy and steering public funds in an agreed-upon direction. As part of a risk response strategy, MnDOT enhanced their website devoted to public engagement, with district staff serving as the key audience. The website serves as a vehicle for information exchange and a one-stop-shop for engagement templates, tools and training opportunities. The website also features an awards program component designed to recognize agency-wide public engagement efforts.

Finding: MnDOT Central Office is commended for enhancements to the Public Engagement website. The repository of information available will serve to enhance consistency and quality for Public Engagement statewide. The information available is a significant improvement on previous tools.

### **Commendation #3: Metropolitan Council’s 2020 – 2021 UPWP**

Observation: A Unified Planning Work Program (UPWP) is a core function of an MPO. UPWPs propose MPO planning activities and are considered grant applications for federal planning dollars. For several years, the Metropolitan Council has been working to improve the quality and format of their UPWP. The 2020 – 2021 UPWP succeeded in this effort. A new appendix provides greater detail on consultant-led projects and gives context for interested readers. The budget is now broken apart with greater precision. UPWP public engagement has also improved, and now includes a new UPWP webpage with an activity summary, the document itself, and several vehicles by which to comment. The Met Council’s new format also served as the model for MnDOT when redesigning their SP&R program documents.

Finding: The Metropolitan Council is commended for enhancement of the 2020 – 2021 UPWP over previous versions. The adjustments substantially improve the format, clarity and transparency of the document and set a higher UPWP standard moving forward.

### **Commendation #4: MnDOT District Freight Plans**

**Observation:** MnDOT has three district-specific Freight Plans under development in Districts 1, 2 and 8. Additional District Freight Plans are scheduled for 2020. Using current data, the plans will outline priorities for MnDOT and freight stakeholders to advance freight planning, investment and operations within each district. Localizing the Freight Plan to the district level will provide context and specificity that cannot be detailed in a state-level plan.

**Finding:** The effort MnDOT placed on completion of District Freight Plans is worthy of commendation. Advancement of District Freight Plans is a quality practice for identifying and prioritizing freight performance needs statewide.

## **Recommendations**

### **Recommendation #1: MnDOT Project Coordination with MPOs**

**Observation:** During the past few years, project coordination between MnDOT and the MPOs has undergone noticeable strain. This includes TIP communication and programming issues with Highway Safety Improvement Program (HISP) projects, Rail Grade Safety Program projects, and public transit capital purchases. Additionally, MnDOT STIP development does not correlate well with the respective MPO TIP update cycles, leading to further coordination and programming issues. Finally, there is MPO concern over their ability to influence TIP project programming within their jurisdiction, a primary responsibility for an MPO.

**Finding:** MnDOT is already considering efforts to improve the issues cited above, and should continue to do so. In concert with these efforts, FHWA will be initiating a Process Review of MnDOT's MPO coordination, with a focus on TIP project programming. Working closely with MnDOT, this review will focus on staff interviews (MnDOT, MPO, and ATPs), TIP programming data collection and analysis, and relevant document evaluation. Detailed recommendations for MnDOT/MPO TIP coordination improvements will be offered in the final report. The review is scheduled for completion in the summer of 2020.

### **Recommendation #2: Projects and Corridor Visioning (Managing Access to Maintain Mobility)**

**Observation:** Balancing access and maintaining mobility is challenging. MnDOT and the MPOs play an important role identifying the appropriate balance for access spacing on the transportation system and its corridors. Roadway access changes are allowed and projects are sometimes funded not in alignment with the purpose and character of the corridor. Congestion or the over-building of corridors can result from decisions inconsistent with the corridor itself. Local agencies receive funding to improve the state highway system, and the improvement may not correspond with an overall vision for the corridor. Other examples would be construction of a single interchange to solve a spot problem without understanding what the corridor's ultimate configuration might be – freeway, surface arterial, superstreet, or another vision.

Real-world examples can be seen in funding insertions such as Corridors of Commerce, or one-time bond funding for an interchange program (17New). Because recent years have shifted MnDOT's focus away from corridor planning, the reliance on one-time funding injections have lead to a more disjointed approach to corridor and interchange development.

Finding: MnDOT and the MPOs have an opportunity to better plan how a corridor will ultimately function. Planners can better link mobility and congestion data and tie corridor vision/function to programming and project decision-making.

### **Recommendation #3: CMP Integration into the Regional Solicitation**

Observation: The Metropolitan Council recently completed the Congestion Management Process (CMP) Plan. The CMP is a systematic and data-driven approach for managing congestion that provides accurate, up-to-date information on transportation system performance. It assesses the alternative strategies for congestion management, meeting state and local needs. A component of the CMP is to identify the implementation schedule, responsibilities and funding sources for each strategy. FHWA's CMP guidebook highlights the use of the CMP in criteria for prioritizing projects in the Metropolitan Transportation Plan (MTP) and/or TIP and explicitly setting aside funding for congestion management projects.

Finding: The Metropolitan Council has an opportunity to enhance the CMP through better integration of investment decisions in the Regional Solicitation. Data use and evaluation criteria are options to consider.

### ***Corrective Actions***

There are no Corrective Actions included in the 2020-2023 STIP Federal Planning Finding.

### **Finalization and Transmittal**

Following submittal to MnDOT, this FPF will be uploaded into FHWA's INPUT Response Tracker. This will officially document its completion and archive the results. It also serves as the tracking system when following up with the State DOT and MPOs on their progress toward resolving identified risk. As this FPF issued no Corrective Actions, it will be uploaded without a Work Plan or assigned task completion dates. We look forward to working with MnDOT to address the recommendations addressed in this document.