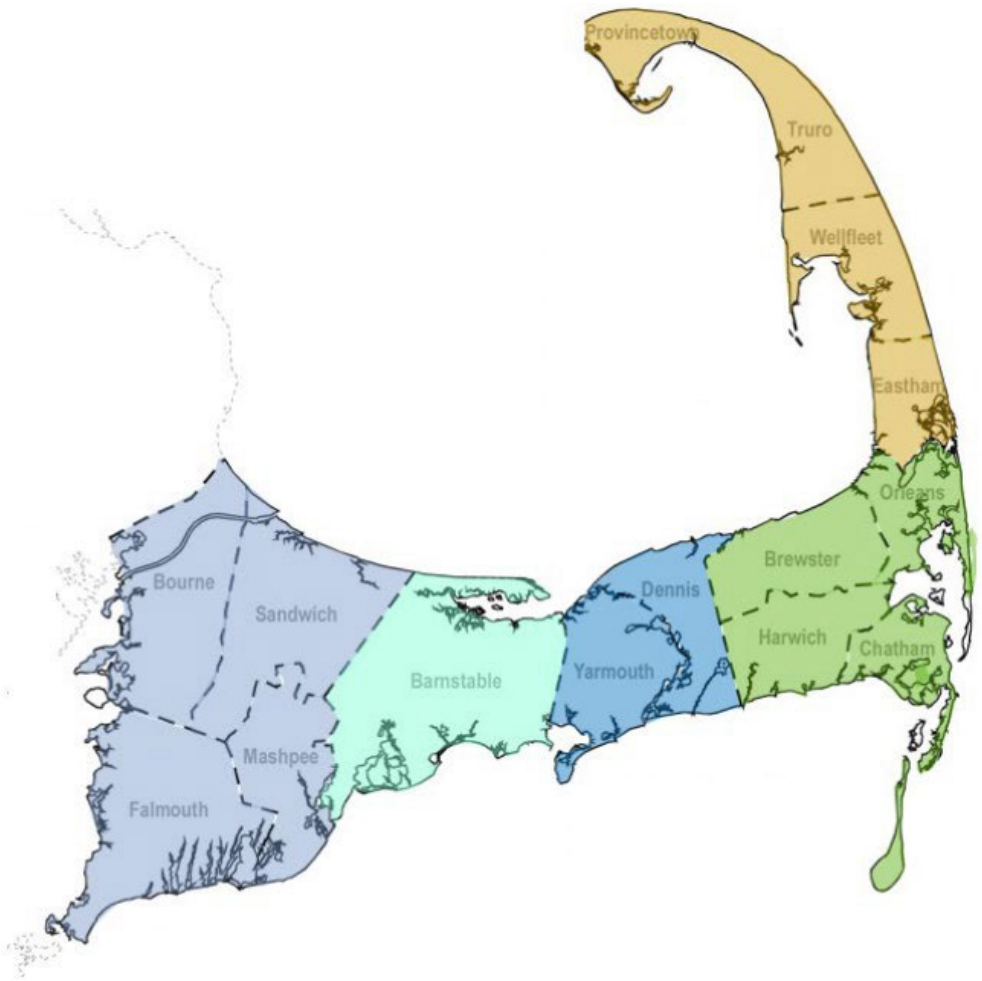
U.S. Department of Transportation

Transportation Management Area Planning Certification Review

Federal Highway Administration

Federal Transit Administration

Cape Cod Metropolitan Planning Organization



March 26, 2026

Final Report

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1.0 EXECUTIVE SUMMARY

On December 3, 2025, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted the certification review of the transportation planning process for the Barnstable Town, MA urbanized area (UZA), as conducted by the Cape Cod Metropolitan Planning Organization (CCMPO), Massachusetts Department of Transportation (MassDOT), and Cape Cod Regional Transit Authority (CCRTA). FHWA and FTA are required to jointly review and evaluate the transportation planning process for each UZA over 200,000 in population at least every four years to determine if the process meets the Federal planning requirements.

1.1 Summary of Current Findings

The current review found that the metropolitan transportation planning process as conducted in the Cape Cod region of the Barnstable Town, MA UZA substantially meets the Federal planning requirements.

As a result of this review, FHWA and FTA are certifying the transportation planning process conducted by CCMPO, MassDOT, and CCRTA. There are also recommendations in this report that warrant close attention and follow-up, as well as areas that the MPO is performing very well in that are to be commended.

MPO Organizational Structure

- **Recommendation:** The MPO should document its internal governance and coordination procedures in a consolidated administrative procedures manual to support institutional continuity and succession planning.
- **Recommendation:** The MPO should continue formal onboarding and training sessions for new Policy Board and Joint Transportation Committee members to ensure consistent understanding of Federal planning requirements.

Civil Rights (Title VI, LEP, ADA)

- **Recommendation:** It is recommended that the MPO continue to explore opportunities to provide summary documents of the MPO's key documents in additional languages in accordance with 70 FR 74087, 67 FR 41455 and its PPP. The MPO should continue to use innovative ideas and tools that will maintain an effective translation method.

Public Participation Plan (PPP)

- **Recommendation:** The MPO should continue refining performance metrics within the PPP to further document engagement effectiveness and equity outcomes.
- **Recommendation:** The MPO should continue coordination with Tribal governments, FHWA, and MassDOT to identify opportunities for strengthening long-term Tribal engagement pathways.

Metropolitan Transportation Plan (MTP)

- **Recommendation:** The MPO should strengthen its transit fiscal constraint documentation in the next MTP update by including system-level transit estimated costs (i.e., operations, capital, preventative maintenance) and revenue forecasts covering the full MTP planning horizon. The MPO should present this information in the financial plan using clear tables that summarize dollar estimates for the following items using year-of-expenditure assumptions: (1) anticipated transit revenues by source (e.g., federal, state, local, private); and (2) estimated costs for a) operations, b) capital, and c) preventative maintenance. This information should align revenues and costs over the full planning horizon to demonstrate how the transit system will be funded over time. CCMPO and CCRTA are expected to develop this information for the MTP in collaboration to ensure consistency with the transit agency's plans, assumptions, and financial data.
- **Recommendation:** As the region prepares for future MTP updates, the MPO should continue to refine documentation of freight conditions and explore opportunities to improve freight-related data collection and analysis.

Transportation Improvement Program (TIP)

- **Recommendation:** The MPO should continue documenting internal TIP procedures and management practices to support continuity planning and institutional knowledge.
- **Recommendation:** The MPO should continue refining fiscal presentations and funding narratives to further enhance clarity for the public and decision-makers.

Performance-Based Planning and Programming (PBPP)

- **Recommendation:** To fully align with 23 CFR 450.324(f)(4), CCMPO's system performance report should clearly display baseline data, performance targets, and current condition data for all FHWA and FTA required measure areas to illustrate progress achieved in meeting performance targets. This should be completed with the next MTP update.
- **Recommendation:** For increased transparency, FHWA and FTA encourages the MPO to complete a performance measure dashboard for its public website that will document its progress towards achieving both regional and federal targets and be updated on a regular basis.

Congestion Management Process (CMP)

- **Commendation:** The MPO is commended for expanding its congestion monitoring program, including year-round traffic counts, non-motorized data collection, and the integration of advanced performance datasets.
- **Recommendation:** The MPO should continue refining its congestion evaluation methodologies to further document historical trend analysis and the effectiveness of implemented strategies.
- **Recommendation:** The MPO should continue advancing coordination with MassDOT, municipalities, and regional partners to support long-term congestion mitigation planning associated with the Canal Bridges Program and other high-impact corridors.

Active & Non-Motorized Transportation and Transit

- **Commendation:** The Federal Team commends the CCMPO for the implementation of the Transit Needs Assessment. This innovative online tool effectively integrates data and resources to comprehensively evaluate the region's transit services. Notably, the study places significant emphasis on gathering public input through targeted surveys, ensuring community voices are central to the decision-making process. Additionally, CCMPO has strengthened key partnerships with stakeholders, further enhancing the region's transit planning and service delivery. This collaborative approach reflects a commitment to fostering efficient, equitable, and responsive transit solutions for the community. The interactive webpage shares maps, ridership data and reports that can be viewed by the public and assist transit providers with improving operations.

Planning and Environment Linkages (PEL)

- **Recommendation:** The MPO should consider formal adoption of FHWA PEL tools and guidance in appropriate corridor and subarea planning efforts.
- **Recommendation:** The MPO should expand structured documentation of planning analyses to improve their usability in future NEPA processes.

2.0 INTRODUCTION

2.1 Background

Pursuant to United States Code (U.S.C.), specifically the laws under 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), FHWA and 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 (UZA), 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 U.S. Census UZAs over 200,000 in population plus four UZAs that received special designation.

In general, the review consists 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 review focuses on compliance with Federal law and regulations, challenges, successes, and experiences of the cooperative relationship among the MPO(s), the State DOT(s), and public transportation operator(s) in the conduct of the metropolitan transportation planning process. Joint FHWA/FTA Certification Review guidelines provide agency field reviewers with latitude and flexibility to tailor the review to reflect regional issues and needs. As a result, 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 the 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 stewardship and oversight activities provide opportunities for this type of review and comment, including Unified Planning Work Program (UPWP) approval, the Metropolitan Transportation Plan (MTP), Statewide and Transportation Improvement Program (S/TIP) findings, Air Quality (AQ) conformity determinations (in nonattainment and maintenance areas), as well as a range of other formal and less formal interactions 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 review effort.

The review process is individually tailored to focus on topics of significance in each Metropolitan Planning Area (MPA). 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.

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 UZAs over 200,000 population to determine if the process meets the Federal planning requirements in the U.S.C. and Code of Federal Regulations (CFR), specifically under 23 U.S.C. 134, 49 U.S.C. 5303, and 23 CFR 450. In 2005, 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. Such frequency has not changed in subsequent Federal transportation legislation, and the latest Federal law, the Bipartisan Infrastructure Law, signed in 2021, continues this requirement for certification reviews.

The CCMPO is the designated MPO for the Barnstable Town, MA UZA. MassDOT is the responsible State agency and CCRTA is the responsible public transportation operator serving as planning partners with CCMPO for this UZA. The Cape Cod Commission (CCC) provides transportation planning staff to the MPO.

Certification of the planning process is a prerequisite to the approval of Federal funding for transportation projects in the area. 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 decisionmakers with the knowledge they need to make well-informed capital and operating investment decisions.

3.0 SCOPE AND METHODOLOGY

3.1 Review Process

The initial certification review was conducted in 2008 following the designation as a TMA per the 2000 U.S. Census. The last review was conducted in 2017-2018. This is the fourth certification review conducted by FHWA and FTA for the region. A summary of the status of findings from the previous certification review is provided in Appendix H: Previous Findings and Disposition. This report covers the 2025 review, which consisted of a desktop documentation review, a formal site visit on December 3, 2025, conducted as a hybrid meeting with participants attending both in person and on Zoom, and a public involvement opportunity, both conducted virtually between December 9 and 15, 2025 at the CCMPO Offices respectively.

Participants in the review included representatives of FHWA, FTA, MassDOT, CCMPO, CCC, and CCRTA. A full list of participants is included in Appendix A: Regulatory Basis.

A review of current documents 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 DOT, and public transportation operator. Background information, current status, and key findings are summarized in the body of the report for subject areas identified by FHWA and FTA staff for the on-site review. Any topic not explicitly addressed in this report has been found to be in compliance by FHWA and FTA.

The certification review report is organized around key transportation planning topic areas discussed during the on-site review. Each planning topic section presents the legal and regulatory basis for the review topic area, summarizes the observations of the Review Team, and lists the key findings, if applicable. Findings may include corrective actions, recommendations, or commendations. Corrective actions describe items that do not meet the requirements of the transportation statute and regulations, along with the actions that must be taken to attain compliance. Recommendations identify steps that should be implemented to improve processes and planning products that already meet minimum Federal requirements. Commendations describe processes and products that are considered notable and identified as best practices. For planning topics without any findings, including those topics not included in this report, the Federal Review Team determined that the transportation planning process was consistent with the Federal requirements.

4.0 PROGRAM REVIEW

4.1 MPO Organizational Structure

4.1.1 Regulatory Basis

This review was conducted pursuant to the Federal statutory and regulatory framework governing metropolitan transportation planning, including 23 U.S.C. 134, 49 U.S.C. 5303, and implementing regulations at 23 CFR Part 450, as well as other applicable provisions specific to this planning topic area. These authorities require that the metropolitan planning process be continuing, cooperative, and comprehensive (3C), performance-based, fiscally constrained, and inclusive of public participation and nondiscrimination principles. A detailed regulatory crosswalk identifying applicable statutory and regulatory requirements for each review area is provided in Appendix A: Regulatory Basis.

4.1.2 Current Status

The Cape Cod Commission (CCC) is the regional planning agency for the Cape Cod region and serves as staff to the CCMPO. During the review the commission's staff structure was discussed and the collaborative approach to transportation and regional planning task were highlighted. The highlights included UPWP tasks, TIP development, data-driven decision-making, and coordination with MassDOT and local partners to advance multimodal, safety, and resiliency projects.

The Policy Board interacts with the public by dividing it into two categories. First is direct interaction with the board then interaction through staff. Public comment is at the beginning of every agenda. Many of the members are educated in the MPO's process and understand the questions that are asked, while some just have general questions to ask. The board and staff have been quite interactive and responsive in meetings. Members have made specific suggestions that have influenced the way projects are conducted. The best examples are the some UPWP projects, direct suggestions from members of the public were noted. Examples from public comment suggestions were – bicycle safety concerns; UPWP projects, and a specific TIP project which detailed transit stop improvements.

Feedback matrixes are prepared on every draft plan which list every public comment received and the responses. The MPO reviews all provided feedback that they receive. In the Vision Zero Action Committee, the MPO had a sub-regional member (who also serves an Orleans Select Board Member) as a committee member who actively participated along with the, the Town of Orleans DPW Director. These members were noted on a detailed email list and informed of all events and important occurrences.

Challenges are also noted during this time as well. At times, members of the public come with great ideas, but fail to recognize that it could take 5 to 10 years for a project to be developed. The MPO doesn't want the public to think that their idea is not noted or important, so it is imperative they follow up one on one with the individuals to acknowledge their concern and describe the process to help guide them in the way to move a project forward. Example – Route 6A and Sandwich a concern surfaced regarding a section of sidewalk needed on State Road, which had a lot of complicating factors, but the MPO was able to meet with the individuals one on one and define the process, discuss the paths forward and ask that patience is required. The process can be overwhelming.

The Policy Board addresses comments from the public depending upon the nature of the comment and if its relative to a specific agenda item is considered during deliberations. Examples – TIP and UPWP – when members are advocating for a project or an initiative, and it's not in the purview of the MPO, the Chair typically advises the direction on how the comments should be addressed – via MassDOT or MPO concern. The board make sure they are aware of

the proper channels because the MPO does not want to discourage any comment, being realistic about the things that are not in the purview is first and foremost.

The composition of the Policy Board meets requirements for representation from the public transportation providers in a couple of ways. Certainly, the direct seat from the Cape Cod Regional Transit Authority on the MPO has direct representation they bring in interest through other coordination efforts; through the Regional Transit Authority (RTA) and with the RTA there are other meetings that occur with all public service providers, so multimodal coordination meetings will have RTA, Steamship, Air Providers, Inter-city Bus Providers which meet and discuss major issues. During this time, they had a forum to discuss the development of long-range Transportation Plan. There is also a standing item at the JTC for Cape Cod RTA to have representation at every JTC meeting. They provide updates, and answer member questions.

MassDOT plays a few roles on the Policy Board. They have two (2) voting seats, the CEO and Secretary which is usually filled by a representation from opposite transportation planning and the Highway Administrator's typically represented by staff from District 5, who has detailed knowledge of the projects. They serve as Chair of the MPO along with other staff who provide updates at each MPO meeting about active TIP and grant projects.

There are certainly providers that are not officially represented on the board but are included in the metropolitan planning process and play a vital part. Woods Hole, Martha's Vineyard and Nantucket Steamship Authority is a non-voting member that is typically represented through that seat and are planning partners on all the work. The Cape Cod Gateway Municipal Airport is not directly represented. The are under the umbrella of the Town of Barnstable (the Airport is owned by the Town managed by the Barnstable Municipal Airport Commission and airport staff), meaning they are represented through that seat and are planning partners on all the work. The MPO meet with airport staff when developing major plans. If there are any items of direct relation, they attend board meetings.

The Cape Cod staff educates, informs, and supports new members of the Policy Board by having a formal MPO Handbook and onboarding which documents the core transportation planning process that outlines the relationship between long range plan to the UPWP and all procedures of the MPO. They meet one on one with new members to give them background on major projects and discuss any concerns they have been facing for the last couple of years. They made it clear that we keep in mind that they are all volunteers, they also take the time to highlight the PPP in the process.

4.1.3 Findings

Recommendation: The MPO should document its internal governance and coordination procedures in a consolidated administrative procedures manual to support institutional continuity and succession planning.

Recommendation: The MPO should continue formal onboarding and training sessions for new Policy Board and Joint Transportation Committee members to ensure consistent understanding of Federal planning requirements.

4.2 Civil Rights (Title VI, Nondiscrimination and Americans with Disabilities Act)

4.2.1 Regulatory Basis

This review was conducted pursuant to the Federal statutory and regulatory framework governing metropolitan transportation planning, including 23 U.S.C. 134, 49 U.S.C. 5303, and implementing regulations at 23 CFR Part 450, as well as other applicable provisions specific to this planning topic area. These authorities require that the metropolitan planning process be continuing, cooperative, and comprehensive (3C), performance-based, fiscally constrained, and inclusive of public participation and nondiscrimination principles. A detailed regulatory crosswalk identifying applicable statutory and regulatory requirements for each review area is provided in Appendix A: Regulatory Basis.

4.2.2 Current Status

The MPO has developed a nondiscrimination program, in accordance with federal and state requirements, to encourage broad public participation, representation and impartiality in the region's transportation planning.

As discussed, the 2022 Title VI Plan update provides certifications and assurances, Title VI notices, complaint procedure forms, information about beneficiaries'' rights, regional demographics data and profile of the area, mobility needs of marginal populations, demographic maps and charts of funding distribution a Public Participation Plan, a language access plan, data collection reporting, the dissemination of Title VI information, and analyses of MPO transportation system investments in the region, project locations and potential impacts from projects to ensure impartiality in the planning and implementation process for the region.

Title VI: The Federal Review Team has evaluated the MPO's Title VI Complaint Form, Title VI Assurances, and the Title VI Notice to the Public, and have found these documents to be consistent with Federal requirements.

Limited English Proficiency: The MPO's Language Assistance Plan states that its website includes a Google Translate link to translate website materials into different languages, and that PDFs may be translated with this tool. During the review, it was noted that the MPO provides a document that informs the public on the role of the

MPO which is translated with qualified translators in all languages identified in the LEP.

Americans with Disabilities Act (ADA): Under the ADA (28 CFR § 35.105) and Section 504 (49 CFR § 27.11), public entities must ensure that all programs, activities, and services are examined to identify barriers to access for persons with disabilities. Every State and municipality are required by Section 504 and by the ADA, to have completed a self-evaluation and an ADA transition plan. The self-evaluation is an inventory of an entity's facilities (e.g., sidewalks, curb ramps, detectable warnings) that identifies barriers in policies (e.g., public meetings in inaccessible locations), programs (e.g., sidewalks and curb ramps— both considered to be "programs"—that are inaccessible to persons with disabilities, or, missing where they should have been constructed) and other activities and services that prevent access for persons with disabilities.

The Review Team acknowledges the MPO's regional role in ADA planning. The MPO used online maps such as Google and Bing maps, and conducted several ADA assessments of sidewalks, curb ramps and crosswalks throughout their communities.

4.2.3 Findings

The MPO's Title VI Program, LEP Program and ADA planning is consistent with new E.O.'s and Federal requirements.

Recommendation: It is recommended that the MPO continue to explore opportunities to provide summary documents of the MPO's key documents in additional languages in accordance with 70 FR 74087, 67 FR 41455 and its PPP. The MPO should continue to use innovative ideas and tools that will maintain an effective translation method.

4.3 Public Participation Plan

4.3.1 Regulatory Basis

This review was conducted pursuant to the Federal statutory and regulatory framework governing metropolitan transportation planning, including 23 U.S.C. 134, 49 U.S.C. 5303, and implementing regulations at 23 CFR Part 450, as well as other applicable provisions specific to this planning topic area. These authorities require that the metropolitan planning process be continuing, cooperative, and comprehensive (3C), performance-based, fiscally constrained, and inclusive of public participation and nondiscrimination principles. A detailed regulatory crosswalk identifying applicable statutory and regulatory requirements for each review area is provided in Appendix A: Regulatory Basis.

4.3.2 Current Status

Since the 2021 review, the CCMPO has continued to expand and institutionalize its public outreach and involvement program. The MPO's Public Participation Plan has been aligned with MassDOT's updated PPP and is reviewed at least every five years to ensure consistency with federal requirements, open meeting law provisions, and emerging best practices. Adjustments have been made to reflect COVID-era innovations, including expanded virtual engagement tools, hybrid meeting formats, and enhanced accessibility measures.

A defining feature of the current program is the integration of agency-wide communications and engagement resources into transportation planning. Implementation of the PPP extends beyond transportation planning staff and leverages communications specialists, digital engagement staff, and community engagement professionals. These teams support media development, multilingual content creation, meeting accessibility, and the distribution of outreach materials through municipal and community partner networks. This integrated structure has expanded the MPO's capacity to conduct sustained, high-quality public involvement across multiple planning efforts.

Hybrid and virtual engagement practices have become permanent components of the MPO's outreach approach. Public meetings now routinely offer in-person, virtual, and call-in participation options. Meetings are recorded and posted online, translation services are available for live and recorded content, and digital comment opportunities are provided through interactive maps, online surveys, and extended comment portals. These tools have increased participation, expanded geographic reach, and enabled engagement by residents who may be unable to attend scheduled meetings.

The MPO has also strengthened its asynchronous engagement strategies. Interactive mapping platforms, web-based surveys, and targeted digital campaigns allow residents to participate on their own schedules and contribute geographically specific feedback. The MPO's modernized website serves as a central engagement hub, hosting planning documents, dashboards, videos, project pages, and comment tools. Continued investment in digital infrastructure has supported accessibility, transparency, and consistent information sharing.

Evaluation of public involvement effectiveness remains an embedded practice. The MPO continues to conduct post-project assessments examining meeting attendance, survey distribution, geographic response patterns, and media reach. These assessments are used to identify engagement gaps and refine outreach approaches. Data from municipal surveys and community feedback have informed communication strategies, emphasizing the importance of social media, visual materials, and targeted outreach. This ongoing evaluation supports the MPO's goal of equitable representation and continuous improvement.

Coordination with Tribal governments and underserved communities remains an evolving focus. The MPO engages Tribal members through general public outreach efforts and maintains direct government-to-government communication pathways for relevant initiatives. Tribal staff have participated in select planning efforts, and a statutory Native American representative on the Cape Cod Commission has strengthened ongoing coordination. The MPO continues to respect Tribal sovereignty while exploring opportunities, in coordination with FHWA and MassDOT, to support more consistent and meaningful engagement.

The MPO also continues to emphasize education and transparency as core outreach objectives. Short explanatory videos, StoryMaps, podcasts, and visual summaries are used to clarify complex planning topics and support informed participation. These products complement traditional engagement approaches and have broadened public understanding of the transportation planning process.

Overall, the CCMPO's public outreach and involvement program reflects substantial maturation since the 2021 review. Integrated staffing resources, permanent hybrid engagement practices, expanded digital platforms, and structured evaluation processes have strengthened the MPO's ability to reach diverse audiences and support meaningful public participation.

4.3.3 Findings

Recommendation: The MPO should continue refining performance metrics within the PPP to further document engagement effectiveness and equity outcomes.

Recommendation: The MPO should continue coordination with Tribal governments, FHWA, and MassDOT to identify opportunities for strengthening long-term Tribal engagement pathways.

4.4 Metropolitan Transportation Plan

4.4.1 Regulatory Basis

This review was conducted pursuant to the Federal statutory and regulatory framework governing metropolitan transportation planning, including 23 U.S.C. 134, 49 U.S.C. 5303, and implementing regulations at 23 CFR Part 450, as well as other applicable provisions specific to this planning topic area. These authorities require that the metropolitan planning process be continuing, cooperative, and comprehensive (3C), performance-based, fiscally constrained, and inclusive of public participation and nondiscrimination principles. A detailed regulatory crosswalk identifying applicable statutory and regulatory requirements for each review area is provided in Appendix A: Regulatory Basis.

4.4.2 Current Status

Since the 2021 review, the CCMPO has completed a full update of its long-range transportation plan. The 2024 Cape Cod Regional Transportation Plan was endorsed by the MPO in July 2023, replacing the prior 2020–2040 plan. The updated plan continues to reflect Cape Cod's integrated regional planning approach, aligning transportation investment priorities with resiliency, economic development, housing, and environmental policy objectives. Scenario planning remains a core element, with the plan evaluating alternative futures informed by seasonal population dynamics, sea-level rise projections, and evolving land-use patterns.

A primary area of progress since the prior review is the enhancement of the MTP's financial plan for highway programs. The updated plan includes revised cost estimates and forecasted revenues across the planning horizon, developed in coordination with MassDOT. System-level financial assumptions for roadway and bridge programs are more clearly documented, and the plan reflects improved linkage between anticipated funding sources and long-range investment strategies.

However, fiscal constraint documentation for transit programs is less developed within the MTP. While the plan references the CCRTA's five-year capital program (FY23–FY27) and a ten-year strategic plan, these documents do not align with the full 20-year MTP planning horizon. The five-year capital program referenced in the MTP only provides detailed revenues and cost projections for the first five years, while years six to ten are limited to a high-level discussion of strategic goals. The MTP transit financial discussion provides appropriate detail on transit revenues through 2040, but no information on expenditures for their transit investments. The narrative describes goals and project types (e.g. capital and operations) at a high level to meet the needs of the region, but this should be translated into a simple table that lists estimated costs over the full MTP planning horizon. that aligns with revenue projections and reflects appropriate year-of-expenditure assumptions.

The MPO continues to coordinate closely with MassDOT and CCRTA on fiscal constraint, cost estimation, and large-scale initiative planning, particularly in the context of the Cape Cod Canal Bridges Program. This coordination supports transparency regarding phased implementation, long-range affordability, and potential impacts on regional funding capacity.

The CCMPO has also continued to evolve its freight considerations within the MTP. While freight activity on Cape Cod presents unique conditions—characterized by bridge crossings, ferry-based logistics, limited intermodal facilities, and growing local delivery traffic—the MPO incorporates freight considerations into project evaluation and long-range corridor planning. Ongoing coordination with MassDOT supports geometric design decisions, safety analysis, and corridor investment strategies at key freight-related locations. Data limitations remain a

challenge, particularly for freight-specific performance monitoring; however, crash data, corridor studies, and project-level analysis continue to inform MTP development.

Public and partner engagement remains embedded in the MTP process. The MPO continues outreach efforts with Tribal partners and maintains coordination with CCRTA, municipal agencies, and regional planning initiatives. Discretionary funding programs are acknowledged within the MTP and TIP, with projects formally programmed following award announcements. The MPO's approach balances fiscal responsibility with strategic readiness to incorporate competitive grant opportunities as they advance.

Overall, the current MTP reflects measurable progression from the 2021 review. Financial planning practices have been strengthened, coordination with state partners has expanded, and performance-based planning tools continue to evolve. To support continued improvement financial planning practices (e.g. transit fiscal constraint), CCMPO is encouraged to consult Appendix H: Resources, which includes links to guidance, tools, and reference materials available to assist in strengthening its program. While data development, freight analytics, and performance dashboard integration remain ongoing priorities, the MTP framework demonstrates a mature and adaptive long-range planning process aligned with federal requirements and regional objectives.

4.4.3 Findings

Recommendation: The MPO should strengthen its transit fiscal constraint documentation in the next MTP update by including system-level transit estimated costs (i.e., operations, capital, preventative maintenance) and revenue forecasts covering the full MTP planning horizon. The MPO should present this information in the financial plan using clear tables that summarize dollar estimates for the following items using year-of-expenditure assumptions: (1) anticipated transit revenues by source (e.g., federal, state, local, private); and (2) estimated costs for a) operations, b) capital, and c) preventative maintenance. This information should align revenues and costs over the full planning horizon to demonstrate how the transit system will be funded over time. CCMPO and CCRTA are expected to develop this information for the MTP in collaboration to ensure consistency with the transit agency's plans, assumptions, and financial data.

Recommendation: As the region prepares for future MTP updates, the MPO should continue to refine documentation of freight conditions and explore opportunities to improve freight-related data collection and analysis.

4.5 Transportation Improvement Program and Project Selection

4.5.1 Regulatory Basis

This review was conducted pursuant to the Federal statutory and regulatory framework governing metropolitan transportation planning, including 23 U.S.C. 134, 49 U.S.C. 5303, and implementing regulations at 23 CFR Part 450, as well as other applicable provisions specific to this planning topic area. These authorities require that the metropolitan planning process be continuing, cooperative, and comprehensive (3C), performance-based, fiscally constrained, and inclusive of public participation and nondiscrimination principles. A detailed regulatory crosswalk identifying applicable statutory and regulatory requirements for each review area is provided in Appendix A: Regulatory Basis.

4.5.2 Current Status

Since the 2021 review, the CCMPO has continued to advance the TIP as a management and implementation tool for the region's long-range transportation priorities. Annual TIP development remains closely coordinated with municipalities, MassDOT, and the Cape Cod Regional Transit Authority (CCRTA). MassDOT's e-STIP system is now fully integrated into the process, supporting improved cost estimation, programming consistency, and transparency. The MPO works extensively with project sponsors to confirm readiness, review milestones, and align project development schedules with funding availability.

A major area of progress since the prior review is the enhancement of the TIP's financial planning documentation. Beginning with the FFY 2023 TIP, the MPO added additional fiscal constraint tables and narrative explaining anticipated revenue sources, funding programs, and year-by-year comparisons of revenues and programmed amounts. These refinements clarified how financial constraint determinations are made for both highway and transit programs and strengthened the TIP's role as a fiscally responsible investment plan. Additional refinements are planned and incorporated on an ongoing basis to further improve clarity and transparency.

Project prioritization practices have continued to mature. The MPO and Joint Transportation Committee (JTC) have updated TIP Transportation Evaluation Criteria over the past several years to increase emphasis on safety, Safe System principles, environmental resilience, vulnerable populations, and system preservation. Projects are rescored regularly, and TEC results inform funding decisions alongside readiness considerations. This approach supports data-driven prioritization while maintaining flexibility to respond to emerging regional needs.

The MPO has also formalized aspects of its project management approach. TIP milestone guidelines were developed to clarify expectations for projects programmed in each year of the TIP, including requirements related to design readiness, coordination, and consultant procurement. These guidelines have improved consistency, sponsor understanding, and

delivery tracking. MPO staff monitor scope, schedule, and cost changes through regular coordination with MassDOT and project proponents, using major design milestones as triggers for cost validation and potential TIP amendments.

The TIP continues to function as a near-term implementation vehicle for the MTP. Long-range priorities, including corridor initiatives, multimodal investments, safety emphasis areas, and resilience planning objectives, are reflected in annual programming decisions. While no formal geographic equity policy has been adopted, the MPO routinely reviews historical funding distributions and considers geographic representation during project selection discussions. The MPO also works proactively with municipalities to advance planning studies that may lead to future TIP eligibility, supporting longer-term project development across the region.

Public participation remains a central element of TIP development. TIP outreach is conducted in accordance with the MPO's Public Participation Plan and includes public comment periods, public meetings, and Joint Transportation Committee engagement. Public input is documented, summarized, and addressed in final TIP approvals. In addition, the MPO continues to acknowledge discretionary funding opportunities within the TIP and incorporates awarded projects through amendments, maintaining flexibility while preserving fiscal integrity.

Overall, the CCMPO's TIP program reflects continued progression since the 2021 review. Enhanced fiscal documentation, refined prioritization criteria, improved coordination tools, and milestone-based management practices have strengthened the TIP's role as both a compliance document and a strategic program management instrument.

4.5.3 Findings

Recommendation: The MPO should continue documenting internal TIP procedures and management practices to support continuity planning and institutional knowledge.

Recommendation: The MPO should continue refining fiscal presentations and funding narratives to further enhance clarity for the public and decision-makers.

4.6 Performance Based Planning and Programming

4.6.1 Regulatory Basis

This review was conducted pursuant to the Federal statutory and regulatory framework governing metropolitan transportation planning, including 23 U.S.C. 134, 49 U.S.C. 5303, and implementing regulations at 23 CFR Part 450, as well as other applicable provisions specific to this planning topic area. These authorities require that the metropolitan planning process be continuing, cooperative, and comprehensive (3C), performance-based, fiscally constrained, and

inclusive of public participation and nondiscrimination principles. A detailed regulatory crosswalk identifying applicable statutory and regulatory requirements for each review area is provided in Appendix A: Regulatory Basis.

4.6.2 Current Status

Developing, and carrying out, jointly agreed upon specific written provisions for Performance-Based Planning and Programming (PBPP): MassDOT, in consultation with Massachusetts MPOs and public transportation operators, finalized a statewide PBPP Agreement on May 6, 2019 to satisfy the requirements under 23 CFR 450.314(h) for coordinated development of specific written provisions for PBPP. The agreement covers responsibilities related to collecting and sharing performance management data, selecting performance targets, reporting performance targets, and reporting progress toward achieving performance targets.

Coordinating, establishing, and reporting performance targets: To date, the CCMPO has chosen to support statewide highway performance targets for safety, infrastructure condition, system reliability, and freight, as well as transit asset management and public transportation safety targets adopted by the CCRTA. Performance targets are formally adopted through action by the CCMPO Policy Board.

Performance-based planning remains a central feature of the MPO framework. The MPO tracks safety, pavement condition, congestion, travel time reliability, and transit performance measures, and continues to support statewide target adoption. These performance areas inform TIP evaluation criteria and corridor prioritization, with Route 6, Route 28, and the Canal bridge corridors remaining focal points due to documented safety and congestion challenges.

Since the last review, the MPO has advanced several public-facing data tools, including Data Cape Cod and Vision Zero dashboards, and has identified the development of a comprehensive transportation performance dashboard as a future priority. These tools improve transparency and support public understanding of performance outcomes and investment priorities.

Evaluating past condition and performance, documenting performance measures and targets, and reporting progress achieved toward meeting targets: The CCMPO 2024-2044 RTP includes a system performance report that describes each of the FHWA and FTA performance measure areas. The report includes targets and actual condition data for each FHWA and FTA performance measure. However, the data presentation should clarify whether targets were achieved in previous performance periods. Future system performance reports for all federal measure areas must include baseline data, targets, and latest condition data to assess its progress toward meeting its performance targets. Additionally, for highway safety, it would be helpful to include a summary table for all performance measures consistent with the other FHWA and FTA measures areas included in the report. As noted during the site visit, for added transparency for the public, CCMPO is developing a comprehensive transportation performance

dashboard for its website that will track progress towards achieving regional and federal targets.

Linking investment priorities to targets, integrating performance-based plans and programs, and describing anticipated future target achievement: The CCMPO FY 2025-2029 TIP includes a robust discussion on performance management, and in particular, how investment decisions are guided by RTP goals and performance measures. The TIP includes details on the CCMPO's project evaluation process and resulting scores for highway projects, which factors in project impact on performance targets. As noted in the TIP, CCRTA separately assesses and recommends transit projects for inclusion in the TIP. Future TIPs could include more details on CCRTA's process for considering performance measures in its project selection process.

CCMPO provides documentation of performance measures, adopted targets, existing conditions, baseline data, and progress toward achieving established targets. To support continued improvement of these practices, CCMPO is encouraged to consult Appendix G: Resources, which includes links to guidance, tools, and reference materials available to assist agencies in strengthening performance-based planning and performance reporting.

4.6.3 Findings

Recommendation: To fully align with 23 CFR 450.324(f)(4), CCMPO's system performance report should clearly display baseline data, performance targets, and current condition data for all FHWA and FTA required measure areas to illustrate progress achieved in meeting performance targets. This should be completed with the next MTP update.

Recommendation: For increased transparency, FHWA and FTA encourages the MPO to complete a performance measure dashboard for its public website that will document its progress towards achieving both regional and federal targets and be updated on a regular basis.

The FHWA and the FTA can provide technical assistance to COG staff as needed. Contact the FHWA MA Division and FTA Region 1 liaisons to request support.

4.7 Congestion Management Process

4.7.1 Regulatory Basis

This review was conducted pursuant to the Federal statutory and regulatory framework governing metropolitan transportation planning, including 23 U.S.C. 134, 49 U.S.C. 5303, and implementing regulations at 23 CFR Part 450, as well as other applicable provisions specific to this planning topic area. These authorities require that the metropolitan planning process be continuing, cooperative, and comprehensive (3C), performance-based, fiscally constrained, and

inclusive of public participation and nondiscrimination principles. A detailed regulatory crosswalk identifying applicable statutory and regulatory requirements for each review area is provided in Appendix A: Regulatory Basis.

4.7.2 Current Status

Since the 2022 review, the CCMPO has completed an updated CMP as part of the 2024 Cape Cod Regional Transportation Plan, endorsed by the MPO in July 2023. This update reflects a significant expansion of available datasets and analytical capabilities. The CMP continues to focus on the region's primary congestion corridors, particularly Route 6 and Route 28, while strengthening the documentation of goals, performance measures, and multimodal strategies consistent with the region's long-range planning objectives.

A major advancement since the previous review is the integration of expanded congestion and reliability datasets. The MPO now utilizes tools such as the Regional Integrated Transportation Information System (RITIS) and INRIX to analyze travel time reliability, planning time index, speed data, and bottleneck conditions. These datasets allow the MPO to differentiate between location-specific operational constraints and broader systemic congestion issues, and to track congestion trends over time. The updated CMP incorporates bottleneck identification and ranking, directly responding to prior recommendations to establish a more systematic, data-driven prioritization framework.

The MPO has also substantially strengthened its traffic monitoring program. Since the last review, CCMPO has transitioned from a primarily seasonal count program to a year-round traffic counting approach. Monthly counts are now conducted, supported by expanded deployment of semi-permanent counters, non-motorized count equipment, and radar-based technologies. These improvements enhance the MPO's ability to capture seasonal variability, monitor emerging congestion patterns, and support corridor-specific studies, particularly in Outer Cape communities with unique travel demand conditions.

CMP data now more directly inform the MPO's planning and programming activities. Bottleneck rankings and congestion diagnostics are consulted during the development of the Unified Planning Work Program to help identify priority study corridors and operational needs. Recent applications of this expanded dataset have supported resurfacing analyses, road diet evaluations, safety studies, and congestion mitigation planning. This represents a shift from descriptive monitoring toward a more performance-informed planning process.

Coordination remains central to CMP implementation. The MPO continues to work closely with MassDOT, municipalities, and CCRTA to align congestion management strategies with capital planning, operations, and transit service considerations. This coordination is especially critical in the context of the Cape Cod Canal Bridges Program, which represents the region's most significant long-term congestion challenge. The MPO is actively engaged in corridor planning,

mitigation discussions, and operational strategy development to address anticipated construction impacts and long-term system resilience.

In parallel with infrastructure planning, the MPO is advancing non-infrastructure and demand management strategies. Current UPWP activities include exploration of a formal Transportation Management Association to support carpooling, vanpooling, coordinated employer engagement, and public information initiatives. The MPO is also examining opportunities to expand park-and-ride facilities, enhance multimodal connectivity, and better integrate rail and ferry-related considerations into congestion mitigation strategies.

Overall, the current CMP reflects substantial progression from the 2022 review. Expanded datasets, year-round monitoring, and the establishment of bottleneck prioritization tools have strengthened the MPO's ability to assess congestion conditions and inform planning decisions. While continued refinement of evaluation methodologies and performance reporting remains an ongoing priority, the CMP now provides a more robust, data-driven foundation to support long-range planning, corridor studies, and congestion mitigation efforts.

4.7.3 Findings

Commendation: The MPO is commended for expanding its congestion monitoring program, including year-round traffic counts, non-motorized data collection, and the integration of advanced performance datasets.

Recommendation: The MPO should continue refining its congestion evaluation methodologies to further document historical trend analysis and the effectiveness of implemented strategies.

Recommendation: The MPO should continue advancing coordination with MassDOT, municipalities, and regional partners to support long-term congestion mitigation planning associated with the Canal Bridges Program and other high-impact corridors.

4.8 Active and Non-Motorized Transportation and Transit

4.8.1 Regulatory Basis

This review was conducted pursuant to the Federal statutory and regulatory framework governing metropolitan transportation planning, including 23 U.S.C. 134, 49 U.S.C. 5303, and implementing regulations at 23 CFR Part 450, as well as other applicable provisions specific to this planning topic area. These authorities require that the metropolitan planning process be continuing, cooperative, and comprehensive (3C), performance-based, fiscally constrained, and inclusive of public participation and nondiscrimination principles. A detailed regulatory crosswalk identifying applicable statutory and regulatory requirements for each review area is

provided in Appendix A: Regulatory Basis.

4.8.2 Current Status

CCMPO collaborates with the region's major transit providers like the Cape Cod Regional Transit Authority, the MBTA and Steamship Authority. CCRTA, a voting member of the MPO policy board, coordinates closely with the MPO in updating the 10-year strategic and 5-year capital plans. CCRTA is working closely with consultants to assess long-term fleet needs and anticipates moving forward with the planning and design of a new maintenance facility within the next couple years. In recent years CCRTA has offered free fares on their fixed route service and have also incorporated a successful micro-transit program (SmartDART) in the system.

The CCMPO focuses on multimodal accommodations, including sidewalks, crosswalks, and bus shelters, and prioritizes regional projects like the Route 28 corridor for connectivity. The MPO is also working on Transit-Oriented Development (TOD) initiatives that will be incorporated into the planning process. The regional priorities include smart growth in transit areas such as Hyannis and Buzzards Bay. The commission is also evaluating a Regional Housing Strategy to address issues around housing supply, affordability and availability. Additionally, the Cape Cod Commission has undertaken an ongoing two-year transit needs assessment that highlights the efforts to improve transit services based on public input and data. As part of the assessment the Commission has solicited more than 360 responses that have contributed to aligning transportation needs with the long-range planning goals.

The CCMPO also partners with the MBTA on the Cape Flyer service and fare coordination, ensuring connectivity with MBTA commuter services and other regional transportation providers. During the site visit the Cape Rail study was mentioned and the MPO discussed the logistical and financial challenges for potential rail services. They also mentioned the strong community support and coordination with the Cape Cod Bridges program.

4.8.3 Findings

Commendation: The Federal Team commends the CCMPO for the implementation of the Transit Needs Assessment. This innovative online tool effectively integrates data and resources to comprehensively evaluate the region's transit services. Notably, the study places significant emphasis on gathering public input through targeted surveys, ensuring community voices are central to the decision-making process. Additionally, CCMPO has strengthened key partnerships with stakeholders, further enhancing the region's transit planning and service delivery. This collaborative approach reflects a commitment to fostering efficient, equitable, and responsive transit solutions for the community. The interactive webpage shares maps, ridership data and reports that can be viewed by the public and assist transit providers with improving operations.

4.9 Planning and Environment Linkages

4.9.1 Regulatory Basis

This review was conducted pursuant to the Federal statutory and regulatory framework governing metropolitan transportation planning, including 23 U.S.C. 134, 49 U.S.C. 5303, and implementing regulations at 23 CFR Part 450, as well as other applicable provisions specific to this planning topic area. These authorities require that the metropolitan planning process be continuing, cooperative, and comprehensive (3C), performance-based, fiscally constrained, and inclusive of public participation and nondiscrimination principles. A detailed regulatory crosswalk identifying applicable statutory and regulatory requirements for each review area is provided in Appendix A: Regulatory Basis.

4.9.2 Current Status

Integration of Environmental Considerations in Planning

The CCMPO has progressed toward outcomes consistent with Planning and Environment Linkages (PEL) principles by strengthening the linkage between planning products and project development considerations. Current planning efforts increasingly incorporate multimodal performance data, environmental context inventories, and documented outreach results that establish a foundation for future environmental evaluations.

Documentation and Interagency Coordination Practices

Elements of PEL implementation — including early interagency engagement and documentation of planning decisions — are present in CCMPO practices. The MPO routinely engages MassDOT, CCRTA, resource and regulatory agencies, and the public in the development of planning products such as the Metropolitan Transportation Plan, Congestion Management Process, and corridor studies. These activities generate records of analysis and coordination that could be further structured to support formal PEL documentation.

Public Involvement and Transparency

Public engagement remains central to CCMPO planning. Engagement products support the development of purpose and need statements, corridor priorities, and alternative concepts, which align with FHWA guidance for viable PEL studies. The MPO's public-facing digital platforms further enhance transparency and long-term documentation of planning outcomes.

Formal PEL Implementation Opportunities

Although the CCMPO has not yet completed a formal PEL study, current and emerging initiatives — including Canal Bridges coordination, Route 6 and Route 28 corridor evaluations, and regional resilience planning — present opportunities to adopt structured PEL

methodologies. Application of FHWA's PEL tools, such as standardized questionnaires and planning-to- National Environmental Policy Act (NEPA) documentation templates, would strengthen the MPO's ability to carry planning decisions forward into environmental review processes.

Overall, CCMPO's planning practices generally align with PEL principles and support improved coordination between transportation planning and project development. FHWA's Every Day Counts (EDC) PEL initiative encourages the use of planning products to inform the NEPA process, helping reduce duplication of effort and improve project delivery efficiency. FHWA Environmental Initiatives resources provide guidance, effective practices, and implementation tools to support these efforts; CCMPO is encouraged to consult Appendix H: Resources for direct access to these materials. Further strengthening documentation practices and more formally applying PEL methodologies would enhance connections between long-range planning, corridor studies, and environmental review activities.

4.9.3 Findings

Recommendation: The MPO should consider formal adoption of FHWA PEL tools and guidance in appropriate corridor and subarea planning efforts.

Recommendation: The MPO should expand structured documentation of planning analyses to improve their usability in future NEPA processes.

Appendix A: Regulatory Basis

Appendix A: Regulatory Basis contains a comprehensive regulatory crosswalk table identifying the Federal statutory and regulatory provisions applicable to the metropolitan transportation planning process reviewed as part of this certification. The table is holistic and includes requirements evaluated during both the on-site review and the pre-review desk audit. It reflects the full scope of authorities under 23 U.S.C. 134, 49 U.S.C. 5303, 23 CFR Part 450, and related provisions, and serves as a reference for compliance tracking and future review cycles.

Topic Area(s)	Required Criterion	Applicable Statutory Regulation(s)	Meets Statutory Regulation(s) (Yes/No/Partial[1])
MPO Planning Agreements and Transit Planning	Defines cooperative responsibilities among MPO, State, and transit agency; documents mutual roles for planning and performance management.	23 CFR 450.314; 49 U.S.C. 5303; 23 U.S.C. 134	**Yes**
Metropolitan Planning Area Boundaries	Covers entire urbanized area and contiguous forecasted area with appropriate stakeholder involvement and documentation.	23 CFR 450.312;	**Yes**
MPO Designation and Redesignation	Ensures MPO designation complies with state and federal procedures with coordination among local officials and Governor.	23 CFR 450.310	**Yes**
Self-Certification Statement	Submitted at least once every four years, typically with the TIP	23 CFR 450.336	**Yes**

[1] "Partial" denotes that the planning process generally satisfies applicable statutory and regulatory requirements; however, opportunities for improvement have been identified. The development of recommendations are advisory and not indicative of systemic noncompliance, but rather reflect areas where alignment with federal expectations and best practices can be strengthened.

Topic Area(s)	Required Criterion	Applicable Statutory Regulation(s)	Meets Statutory Regulation(s) (Yes/No/Partial[1])
	Jointly signed by State DOT and MPO	23 CFR 450.336	**Yes**
	Confirms compliance with all applicable federal laws and planning regulations	23 CFR 450.336	**Yes**
	Includes reference to civil rights, Clean Air Act, DBE, ADA, and Title VI	23 CFR 450.336	**Yes**
Public Participation Plan	Provides for reasonable opportunity to comment	23 CFR 450.316; Title VI	**Yes**
	Minimum 45-day public comment period before adoption or amendment	23 CFR 450.316; 23 CFR 450.324(j); Title VI	**Yes**
	Includes outreach strategies for LEP and EJ communities	23 CFR 450.316; 23 CFR 450.324(j); Title VI	**Yes**
	Uses visualization and electronic engagement tools	23 CFR 450.316; 23 CFR 450.324(j); Title VI	**Yes**
	Documents public input and MPO responses	23 CFR 450.316; 23 CFR 450.324(j); Title VI	**Yes**
	Evaluates effectiveness of public participation	23 CFR 450.316; 23 CFR 450.324(j); Title VI	**Yes**
Civil Rights (Title VI, Nondiscrimination and Americans with Disabilities Act) and Limited English Plan Compliance Documentation	Maintains signed Title VI Assurances and nondiscrimination policies	42 USC 2000d; 49 CFR Part 21; 23 CFR Part 200; 28 CFR Part 42; 70 FR 74087	**Yes**
	Performs Four-Factor LEP Analysis to guide language services	42 USC 2000d; 49 CFR Part 21; 23 CFR Part 200; 28 CFR Part 42; 70 FR 74087	**Yes**

Topic Area(s)	Required Criterion	Applicable Statutory Regulation(s)	Meets Statutory Regulation(s) (Yes/No/Partial[1])
	Documents outreach to disabled and underserved communities	42 USC 2000d; 49 CFR Part 21; 23 CFR Part 200; 28 CFR Part 42; 70 FR 74087	**Yes**
	Demonstrates ADA Transition Plan or programmatic access planning	42 USC 2000d; 49 CFR Part 21; 23 CFR Part 200; 28 CFR Part 42; 70 FR 74087	**Yes**
	Ensures compliance with Section 504 and 49 CFR Parts 27, 37, 38	42 USC 2000d; 49 CFR Part 21; 23 CFR Part 200; 28 CFR Part 42; 70 FR 74087	**Yes**
Unified Planning Work Program	Developed in cooperation with the State and public transit agencies	23 CFR 450.308; 23 CFR 420.111; IIJA §11206; 49 U.S.C. 5305(f)(2)	**Yes**
	Includes planning priorities, activity descriptions, schedule, responsible parties, and deliverables	23 CFR 450.308; 23 CFR 420.111; IIJA §11206; 49 U.S.C. 5305(f)(2)	**Yes**
	Reflects all funding sources, including Title 23 and Title 49	23 CFR 450.308; 23 CFR 420.111; IIJA §11206; 49 U.S.C. 5305(f)(2)	**Yes**
	Minimum 2.5% PL funds for Complete Streets unless justification for opt-out is provided	23 CFR 450.308; 23 CFR 420.111; IIJA §11206; 49 U.S.C. 5305(f)(2)	**Yes**
	Includes fiscal summaries and cost estimates per task	23 CFR 450.308; 23 CFR 420.111; IIJA §11206; 49 U.S.C. 5305(f)(2)	**Yes**
	Demonstrates Title VI and LEP outreach activities	23 CFR 450.308; 23 CFR 420.111; IIJA §11206; 49 U.S.C. 5305(f)(2)	**Yes**

Topic Area(s)	Required Criterion	Applicable Statutory Regulation(s)	Meets Statutory Regulation(s) (Yes/No/Partial[1])
	Conducts studies and plans in collaboration with partners, considers scenario planning and environmental linkages under 23 CFR 450.318.	23 CFR 450.318; 23 U.S.C. 134	**Yes**
Metropolitan Transportation Plan	Addresses the 3C process and planning factors including performance-based planning, coordination with state and transit, ITS architecture compliance.	23 CFR 450.306,23 U.S.C. 134, 49 U.S.C. 5303	**Yes**
	Updated every 4 or 5 years depending on air quality status	23 CFR 450.324; 23 CFR 450.306; IIJA §11202; Clean Air Act; 49 U.S.C. 5303	**Yes**
	Includes multimodal strategies and system-level investments	23 CFR 450.324; 23 CFR 450.306; IIJA §11202; Clean Air Act; 49 U.S.C. 5303	**Yes**
	Integrates performance measures and targets	23 CFR 450.324; 23 CFR 450.306; IIJA §11202; Clean Air Act; 49 U.S.C. 5303	**Yes**
	Includes system performance report tracking target progress	23 CFR 450.324; 23 CFR 450.306; IIJA §11202; Clean Air Act; 49 U.S.C. 5303	**Yes**
	Provides opportunity for public and stakeholder input	23 CFR 450.324; 23 CFR 450.306; IIJA §11202; Clean Air Act; 49 U.S.C. 5303	**Yes**
	Reflects fiscal constraint and environmental mitigation strategies	23 CFR 450.324; 23 CFR 450.306; IIJA §11202;	**Yes**

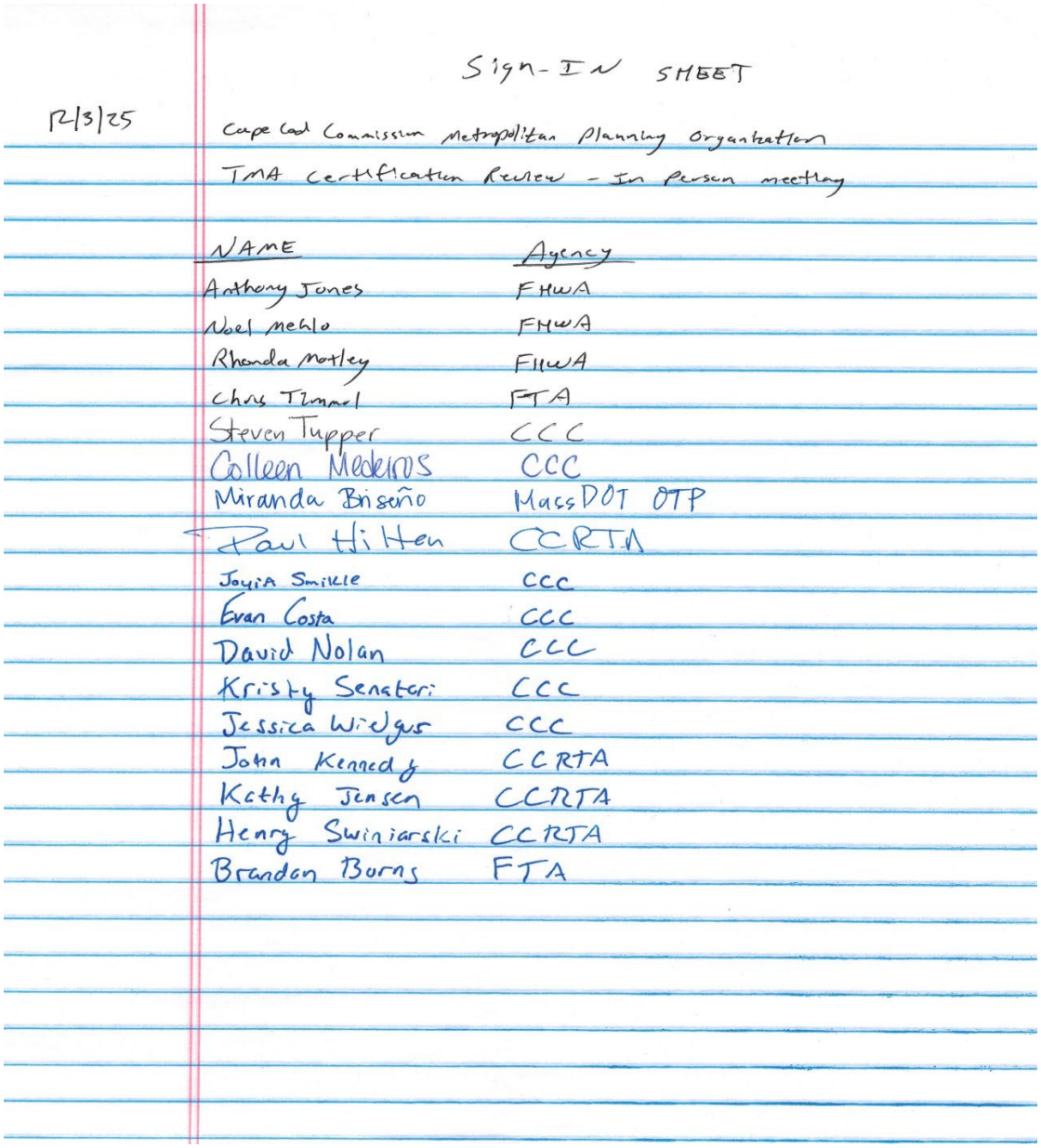
Topic Area(s)	Required Criterion	Applicable Statutory Regulation(s)	Meets Statutory Regulation(s) (Yes/No/Partial[1])
		Clean Air Act; 49 U.S.C. 5303	
	Identify revenues reasonably expected to be available for MTP and TIP	23 CFR 450.324(f); 23 CFR 450.326(j)	**Yes**
	Include system-level cost estimates for operations and maintenance	23 CFR 450.324(f); 23 CFR 450.326(j)	**Partial**
	Demonstrate fiscal constraint in financial summaries	23 CFR 450.324(f); 23 CFR 450.326(j)	**Partial**
	Coordinate financial assumptions with state and transit operators	23 CFR 450.324(f); 23 CFR 450.326(j)	**Yes**
	Considers freight movement needs and integrates them in planning and investment priorities.	23 CFR 450.306(b)	**Yes**
	Incorporates TPM into planning and programming including PM1 (safety), PM2 (pavement/bridge condition), PM3 (system performance), CMAQ emissions, freight, congestion measures, transit asset management, and transit safety.	23 CFR 450.306, 490.207, 490.307, 490.407, 490.507, 490.607, 490.707, 490.807,490.707, 490.807, 49 CFR 673, 625.	**Yes**
	Nonmotorized Planning / Livability	23 CFR 450.306, 450.324(f)	**Yes**
	Conducts studies and plans in collaboration with partners, considers scenario planning and environmental linkages under 23 CFR 450.318.	23 CFR 450.318; 23 U.S.C. 134	**Yes**

Topic Area(s)	Required Criterion	Applicable Statutory Regulation(s)	Meets Statutory Regulation(s) (Yes/No/Partial[1])
	Integrates safety and security planning into MTP, TIP, and project selection using performance measures and coordination with safety stakeholders.	23 CFR 450.306(b), 450.306(d), 450.324(h)	**Partial**
Transportation Improvement Plan	Includes all federally funded and regionally significant projects	23 CFR 450.326; 23 CFR 450.330; 40 CFR Part 93; 49 U.S.C. Chapter 53	**Yes**
	Demonstrates fiscal constraint with year-by-year balanced funding	23 CFR 450.326; 23 CFR 450.330; 40 CFR Part 93; 49 U.S.C. Chapter 53	**Yes**
	Contains project descriptions, phases, costs, and funding sources	23 CFR 450.326; 23 CFR 450.330; 40 CFR Part 93; 49 U.S.C. Chapter 53	**Yes**
	Includes conformity documentation where applicable	23 CFR 450.326; 23 CFR 450.330; 40 CFR Part 93; 49 U.S.C. Chapter 53	**Yes**
	Links TIP implementation to MTP goals	23 CFR 450.326; 23 CFR 450.330; 40 CFR Part 93; 49 U.S.C. Chapter 53	**Yes**
	Lists major delayed or completed projects	23 CFR 450.326; 23 CFR 450.330; 40 CFR Part 93; 49 U.S.C. Chapter 53	**Yes**
	Identify revenues reasonably expected to be available for MTP and TIP	23 CFR 450.324(f); 23 CFR 450.326(j)	**Yes**
	Include system-level cost estimates for operations and maintenance	23 CFR 450.324(f); 23 CFR 450.326(j)	**Yes**
	Demonstrate fiscal constraint in financial summaries	23 CFR 450.324(f); 23 CFR 450.326(j)	**Yes**

Topic Area(s)	Required Criterion	Applicable Statutory Regulation(s)	Meets Statutory Regulation(s) (Yes/No/Partial[1])
	Coordinate financial assumptions with state and transit operators	23 CFR 450.324(f); 23 CFR 450.326(j)	**Yes**
	Considers freight movement needs and integrates them in planning and investment priorities.	23 CFR 450.306(b)	**Yes**
	Incorporates TPM into planning and programming including PM1 (safety), PM2 (pavement/bridge condition), PM3 (system performance), CMAQ emissions, freight, congestion measures, transit asset management, and transit safety.	23 CFR 450.306, 490.207, 490.307, 490.407, 490.507, 490.607, 490.707, 490.807,490.707, 490.807, 49 CFR 673, 625.	**Yes**
	Nonmotorized Planning / Livability	23 CFR 450.306, 450.324(f)	**Yes**
	Planning Studies and Project Development	23 CFR 450.318; 23 U.S.C. 134	**Yes**
	Integrates safety and security planning into MTP, TIP, and project selection using performance measures and coordination with safety stakeholders.	23 CFR 450.306(b), 450.306(d), 450.324(h)	**Yes**
	Produce and publish an annual listing of projects for which Federal funds were obligated	23 CFR 450.334	**Yes**
	Include sufficient detail to identify project name, sponsor, description, and funding amounts	23 CFR 450.334	**Yes**
	Ensure public availability of the listing through MPO website or annual reporting	23 CFR 450.334	**Yes**

Topic Area(s)	Required Criterion	Applicable Statutory Regulation(s)	Meets Statutory Regulation(s) (Yes/No/Partial[1])
Congestion Management Process	Maintain a systematic CMP process and update regularly	23 CFR 450.322 (TMAs only)	**Yes**
	Use performance measures to identify congestion and causes	23 CFR 450.322 (TMAs only)	**Yes**
	Include strategies for congestion mitigation including demand management and operational improvements	23 CFR 450.322 (TMAs only)	**Yes**
	Integrate findings into MTP and TIP project selection	23 CFR 450.322 (TMAs only)	**Yes**
	Document system performance and effectiveness of strategies implemented	23 CFR 450.322 (TMAs only)	**Yes**
	Integrates safety and security planning into MTP, TIP, and project selection using performance measures and coordination with safety stakeholders.	23 CFR 450.306(b), 450.306(d), 450.324(h)	**Yes**
Air Quality and Transportation Conformity	Document interagency consultation processes	40 CFR Part 93; Clean Air Act Sections 174, 176(c) & (d)	**Yes**
	Maintain current conformity determinations for MTP and TIP in nonattainment/maintenance areas	40 CFR Part 93; Clean Air Act Sections 174, 176(c) & (d)	**Yes**
	Use latest emissions models and planning assumptions	40 CFR Part 93; Clean Air Act Sections 174, 176(c) & (d)	**Yes**
	Demonstrate consistency with the State Implementation Plan (SIP)	40 CFR Part 93; Clean Air Act Sections 174, 176(c) & (d)	**Yes**

Appendix B: On-Site Meeting Attendance



Sign-In Sheet

12/3/25

Cape Cod Commission Metropolitan Planning Organization
TMA Certification Review - In Person meeting

NAME	Agency
Anthony Jones	FHWA
Noel Mello	FHWA
Rhonda Motley	FHWA
Chris Timmel	FTA
Steven Tupper	CCC
Colleen Medeiros	CCC
Miranda Briseño	MassDOT OTP
Paul Hilton	CCRTA
Joyia Smiklie	CCC
Evan Costa	CCC
David Nolan	CCC
Kristy Senateri	CCC
Jessica Wielgus	CCC
John Kennedy	CCRTA
Kathy Jensen	CCRTA
Henry Swiniarski	CCRTA
Brandon Burns	FTA

Appendix C: On-Site Meeting Agenda

Cape Cod Commission Metropolitan Planning Organization
Transportation Planning Certification Review
3225 Main Street (Route 6A) Barnstable, Massachusetts 02630
December 3, 2025
9:00 am to 5:00 pm
Agenda

Microsoft Teams
Join the meeting now
Meeting ID: 231 481 617 193 1
Passcode: kQ6Qi7bz

Dial in by phone
+1 509-931-1572 United States
Phone conference ID: 137 796 802#

Time	Topic	Lead
9:00am-9:05am	Welcome and Introductions • Federal Review Team Introductions & Certification Overview	Federal Team

9:05am-10:00am	MPO Showcase
	• MPO Introductions:
	  ○ Key Staff
	  ○ MVMPO Board
	• Activities/Accomplishments
	• Previous Certification Review Findings & Actions
		MPO

10:00am-10:30am	MPO Organization and Governance • MVMPO Agreement • TMA/MPA Boundaries & Regional Coordination	Federal Team
10:30am-11:00am	Title VI, Nondiscrimination, and ADA Public Participation Plan and LEP	Federal Team
11:00am-11:15pm	***Break One – Fifteen Minutes***	
11:15pm-12:00pm	Metropolitan Transportation Plan • Development/Engagement Process • Travel Demand Model/Forecasting • Financial Planning (MTP) • Freight	Federal Team
12:00pm -1:15pm	***Lunch***	
1:15pm-2:00pm	Transit Planning • Coordination • Transit-Oriented Development	Federal Team
2:00pm – 2:45pm	Transportation Improvement Program • Financial Planning • Project Selection	Federal Team
2:45pm-3:15pm	Performance Based Planning	Federal Team
3:15pm-3:30pm	***Break Two – Fifteen Minutes***	
3:30pm – 4:00pm	Congestion Management Plan and Process	Federal Team

4:00pm-4:30pm	Special Interest Topics • Active and Non-Motorized Transportation • Safety • Planning and Environmental Linkages	**Federal Team**
4:30pm-5:00pm	Debrief Discussion: • Ideas for Growth/Improvement	**Federal Team/MPO**

Appendix D: Public Meeting Notice

U.S. Department of Transportation

Federal Highway Administration
MA Division
220 North Binney St, 9th Floor
Cambridge, MA 02142-1093
617-494-3657
617-494-3355 (fax)

Federal Transit Administration
Region I
220 North Binney St, 9th Floor
Cambridge, MA 02142-1093
617-494-2055
617-494-2865 (fax)

PUBLIC INPUT OPPORTUNITY

Come share your views about and experience with the transportation planning process in the Cape Cod Metropolitan Planning Organization region!

Every four years, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) are required to review the metropolitan transportation planning process conducted by the Cape Cod Metropolitan Planning Organization (MPO), Massachusetts Department of Transportation, and the Cape Cod Regional Transit Authority (CCRTA) public transportation, and local municipal partners in order to certify that they are carrying out the planning process in accordance with all applicable Federal requirements.

As part of this review, the Federal agencies would like to hear from members of the public about their views of how the transportation planning process is conducted in the region during these sessions:

Session 1: Virtual Session

Time: 2:00 PM – 3:00 PM
Date: Thursday, December 11, 2025
Location: This meeting will be held virtually on Zoom.
Join via **Zoom** at this meeting link or using Meeting ID: 160 387 2856, Passcode: 839426.
To join the meeting by phone, dial +1 (646) 828-7666.

Session 2: Hybrid Session

Time: 1:00 PM – 2:00 PM
Date: Monday, December 15, 2025
Location: This meeting will be held virtually and in-person at:
3225 Main Street (Route 6A) Barnstable, Massachusetts 02630
Join via **Zoom** at this meeting link or using Meeting ID: 161 613 0800, Passcode: 366468.
To join the meeting by phone, dial +1 (646) 828-7666.

If you are unable to attend, you may also submit your comments or observations in writing by **December 22, 2025**, to:

FHWA: Anthony Jones, Program Development Team Leader
Email: anthony.jones1@dot.gov

FTA: Brandon Burns, Transportation Program Specialist
Email: michael.burns1@dot.gov

This meeting is accessible to people with disabilities and those with limited English proficiency. Accessibility accommodations and language services will be provided free of charge, upon request, as available. Please contact Anthony Jones at Anthony.Jones1@dot.gov for more information.

Appendix E: Public Comments

FHWA and FTA jointly led two public involvement session one conducted virtual on December 11, and the second on 15, 2025 at the CCMPO Offices. As part of the CCMPO's regularly monthly policy board meeting the federal team heard from the public on how they feel the metropolitan planning process is working in the Cape Cod region. After providing an overview of the TMA certification review process, FHWA and FTA opened it up to the public to share their comments.

Commenter	Format	Comment	Received
Mandi Speakman, MS Deputy Director/senior Project Manager Human Services Barnstable County, Regional Government of Cape Cod	Email: Cape Cod Metropolitan Planning Organization Federal Certification Review	To Whom It May Concern, Please accept these written comments regarding the Cape Cod Metropolitan Planning Organization Federal Certification Review. Healthy Aging Cape Cod (HACC), through the Barnstable County Department of Human Services, is pleased to confirm our partnership and collaboration with the Cape Cod Commission (CCC). The transportation needs of the aging population rise as a priority in the initiatives being worked on by HACC. Understanding and addressing these needs requires a cross-sector and collaborative approach. The relationships that have been built by CCC through HACC have been mutually beneficial and valuable to the older adults in our region and those who serve them. The following initiatives illustrate these efforts: • The Barnstable Center for Active Living, an active member of HACC, hosted a focus group as part of the Cape Cod Commission Transit Needs Assessment. This focus group helped gather vital information on the specific transportation needs of older adults, which informed future planning and resource allocation. • Reframe Aging trainings held by HACC and attended by the CCC staff focus on ageism and stigma reduction. These trainings aim to increase awareness about the challenges faced by older adults and promote the use of resources for improved transportation and reduced isolation. The sessions include practical strategies for combating stereotypes and fostering a more inclusive community. • The digital resource mapping project underway by the HACC Digital Equity Work Group, which includes CCC staff, involves documenting and mapping resources, including transportation resources. This project aims to lower barriers and improve access for older adults by providing a clear and comprehensive guide to available services.	December 11, 2025

		These initiatives, and the Cape Cod Commission's contributions to them, help improve transportation access for older adults, reducing isolation and enhancing their quality of life. Thank you for your time. Mandi Speakman	
Lisa Estrela-Pedro, Transportation Planning Manager Southeastern Regional Planning & Economic Development District	Email: Cape Cod Commission Federal Certification Coordination Comments	Dear Mr. Jones: Considering the Cape Cod's Commission Federal Certification process, we would like to recognize their valuable work and highlight our collaboration efforts. Over the past several years, we have collaborated with Cape Cod Commission staff on numerous efforts and topics. These collaborations have occurred both within the Transportation Managers Group meetings and on additional, separate initiatives. We have coordinated on Regional Transportation Plan efforts, regionally significant cross border bike connections, SS4A grants, work on the Canal bridges, proposed changes to Urbanized Areas, and cross border developments. During the development of our Regional Evacuation Route study, SMMPO staff coordinated with the Cape Cod commission by looking at routing of vehicles off Cape Cod in the event of an evacuation. Transit and ferry services were also discussed. SMMPO staff has also sought guidance on their data collection efforts and equipment including EcoCounters and their StarTrak Data Collector. Cape Cod Commission staff was extremely helpful throughout the procurement and deployment of our EcoCounters used in our Regional Bicycle and Pedestrian Count Program. Prior to procurement, their staff provided valuable insights that helped us navigate initial questions about technology and equipment. After the acquisition, they continued to support us with practical tips. Cape Cod Commission staff has always been very responsive with all inquiries and has provided us with valuable information. SMMPO staff is grateful for their assistance and looks forward to continued collaboration to improve our work and Southeastern Massachusetts. Lisa Estrela-Pedro, Transportation Planning Manager	December 15, 2025
Stephen Buckley	Email: MPO Recertification;	Hello Mr. Jones,	December 12, 2025

	Guidance documents for	Following up on our conversation yesterday on Zoom, I am requesting that you and Mr. Burns share with me those FHWA, FTA and/or USDOT documents that will be used to guide the Cape Cod MPO Recertification process. If the public can gain a good understanding of what exactly the FHWA/FTA is looking for, then the public can understand what sort of input would be the most valuable to contribute ..instead of unfocused feedback. As a reminder, I am also interested in the FHWA guidance (from HQ) that the Mass. division used in reviewing and approving the adequacy of the MassDOT's recent update of its Public Participation Plan (October 2025). I realize that the next public meeting for Recertification is this Monday, so if you can provide one or more links today, then I can look at them over the weekend. Thank you for your attention. sincerely, Stephen Buckley	
Anthony Jones	Email response to Mr. Buckley Re: MPO Recertification; Guidance documents for	Mr. Buckley, Thank you for following up. Below are FHWA/FTA/USDOT resources that describe (1) what a TMA MPO Certification (Recertification) Review covers and (2) the statutes/regulations those expectations are based on, all of which are also publicly available. These are the same core references the Federal Review Team uses to frame the desk review, site visit discussions, and the final certification report. **1) TMA Certification Review Guidance and Handbook materials** Primary "what to expect" primers / handbooks • Transportation Management Area (TMA) Planning Certification Review Primer(Volpe/ROSA – USDOT repository) • TMA Certification Process Field Handbook (Volpe Oversight site) Public involvement (to help focus public input on the right topics) • FHWA - Public Involvement/Public Participation • Statute, Regulation and Executive Orders • Publications	December 16, 2025

		• FTA - Public Involvement & Outreach in Transportation Planning" • USDOT "Promising Practices for Meaningful Public Involvement in Transportation Decision-making" (PDF) **2) Federal laws and regulations the Certification Review requirements are derived from** Statutes (U.S. Code) • 23 U.S.C. § 134 – Metropolitan transportation planning • 49 U.S.C. § 5303 – Metropolitan transportation planning (includes the 4-year certification • requirement for TMAs and public involvement in certification determinations) • 23 U.S.C. § 135 – Statewide and nonmetropolitan transportation planning • 49 U.S.C. § 5304 – Statewide and nonmetropolitan transportation planning Regulations • 23 CFR Part 450 – Planning Assistance and Standards (joint FHWA/FTA planning • regulations; includes certification review and public participation requirements) **3) Your question on HQ guidance used for MassDOT's October 2025 Public Participation Plan (PPP) adequacy review** I have inquired about and searched for specific Public Participation Plan review criteria and guidance however, as I mentioned during our Public meeting discussion on Thursday December 11, 2025, there is not a standalone "HQ memo" or "review guidance" that supplements the governing requirements. In practice, Division review/acceptance of a statewide PPP update is anchored in the statutes and 23 CFR Part 450.10 requirements for statewide planning and public involvement, and is informed by FHWA/FTA public involvement resources (including the items linked above). I do hope that the information that I provided is helpful, you can treat the TMA Certification Review Primer and TMA Certification Process Field Handbook as the best resources driving guiding FHWA/FTA assessment and review of the Cape Cod MPO planning process and know that the expectations are derived from established federal statute/regulation. If you may have further questions or concerns, please do not hesitate to follow up by reaching out to myself or Brandon.	

Stephen Buckley	Email response Anthony Jones Re: MPO Recertification; Guidance documents for	Hello Mr. Jones and Mr. Burns, Please include this entire, unredacted email-thread as my feedback on recertification of the Cape Cod MPO. I appreciate your sending me (below) the criteria that is used to evaluate the compliance of an MPO (Metropolitan Planning Organization) with FHWA & FTA requirements to receive federal funding for transportation projects. Because my special interest in the legal requirements for Public Involvement/Participation in government decision-making, I have attended almost all the meetings of the Cape Cod MPO for over 10 years. After receiving your email, I used the artificial intelligence feature of Google's Gemini to do further research .. that I would like to share with you: In the 2025 MassDOT Public Participation Plan (PPP) and the current Cape Cod Bridges Program, MassDOT defines "consideration" through a formal Comment Disposition process. To address your point about the "missing" website listings: the FHWA's recent pressure forced MassDOT to admit that if a notice isn't findable, the "consideration" period is technically flawed. To fix this, they now use the PIMA (Public Involvement Management Application) as a centralized, auditable database that tracks not just what you say, but where you saw the notice. 1. The "Theme and Response" Matrix When MassDOT says they "considered" input, they are referring to a Summary of Comments Matrix (typically found in Appendix B of major project filings). Instead of replying to every person individually, they aggregate comments into themes. For the Cape Cod Bridges Project (2024–2025), the matrix looks like this: | Comment Theme | Public Input Received | MassDOT "Consideration" / Action ||---|---|---| | Notice & Outreach | "The notice wasn't on the Public Notices page; I didn't know the meeting was happening." | Response: Acknowledged. Action: MassDOT moved to "Redundant Notification," cross-posting to the State Environmental	December 22, 2025

		Monitor, PIMA, and social media to ensure multiple points of access. | | Multimodal Access | "The bridge needs better bike/pedestrian connections to local trails." | Response: Accepted. Action: The Draft EIR (Sept 2025) was updated to extend the Sandwich Road shared-use path to the Gallo Ice Arena. | | Climate/Pollution | "Projections of 31% more traffic violate state climate laws." | Response: Noted. Action: MassDOT maintained the traffic model based on "population growth" but added a section analyzing potential Greenhouse Gas (GHG) mitigation. | 2. Proof of "Legally Adequate" Notice Because of the FHWA Corrective Action, MassDOT can no longer simply claim they "posted it." They now maintain an Outreach Log that they must submit to federal auditors. This log contains: * Timestamped Proof: When the notice went live on the MassDOT calendar. * PIMA Analytics: Data showing how many people clicked the "Notice" link from different sources (Email vs. Website vs. Facebook). * Geographic Verification: Using the "Equity Dashboard" to prove they sent notices specifically to ZIP codes in Environmental Justice areas (like parts of Bourne and Wareham). 3. The "Unpredictability" Check (The 15-Day Rule) The most critical way MassDOT proves "consideration" is by timing. Under the new 2025 rules: * Public Comment Period: Ends (e.g., Oct 24, 2025). * Summary Published: MassDOT must publish the Summary of Comments and their responses. * The "Cooling Off" Period: At least 15 days must pass between the publication of that summary and the final vote to adopt the plan. > Why? This prevents the agency from receiving 1,000 comments on a Monday and "approving" the plan on a Tuesday, which FHWA defines as a failure of "meaningful consideration." > ***Summary***: Did they obey the law? If you found that a notice was missing from the "Public Notices" website during the draft period, you have a valid basis for a Title VI or Planning Complaint to the FHWA. The 2025 PPP explicitly states that "reasonable access" requires the process to be predictable. If the "official" location for notices was empty, MassDOT failed its own performance standard for "Reach and Transparency."	

		Would you like me to provide the direct contact information for the FHWA Massachusetts Division Office so you can file a formal inquiry regarding the missing website listing? --- This chat can be found at: https://g.co/gemini/share/1c6f14561710 --- Please consider the above in considering the adequacy of performance of MassDOT and the Cape Cod MPO in its efforts in Public Involvement) Participation. best regards, Stephen Buckley	

Appendix F: Previous Findings and Disposition

The last certification review for the CCMPO planning area of the Barnstable Town, MA UZA was conducted in November 2021. The joint FHWA/FTA certification letter was issued on February 1, 2022, subject to the resolution of one corrective action. As of October 2022, both corrective actions were resolved. FHWA and FTA jointly issued a letter on October 21, 2022 acknowledging resolution and officially recertifying the transportation planning process. The 2021 Certification Review findings and their dispositions are summarized below. Please note that dispositions below are reported by CCC staff; they do not serve as an assessment by the Federal Review Team.

Transportation Planning Certification Review of the Cape Cod Metropolitan Planning Organization (CCMPO) Final Report – February 1, 2022

FHWA & FTA Findings	Planning Partners Response & Proposed Action	Responsibility	Target Date(s)	Status Update as of 7/31/2022
Corrective Action				
MPO Organizational Structure				
1. The MPO shall revise its MOU to ensure compliance under 23 CFR 450.314(a) and (b) addressing responsibilities for the development of financial plans that support the MTP and TIP, and the development of the annual listing of obligated projects. With this revision, the MPO shall ensure all signatures required for execution of the MOU are included, in accordance with any relevant provisions within the MOU. This corrective action shall be resolved by September 30, 2022.	MPO staff will draft a revised MOU for FHWA and FTA review and potential adoption by the MPO in the Spring of 2022.	MPO	Spring 2022	In progress. The MPO adopted a revised MOU at their meeting on April 25, 2022. Staff distributed the MOU for signature. Staff are awaiting the signature from the Mashpee Wampanoag Tribe and the MassDOT Secretary (who indicated a preference to proceed after the other signatures were gathered).
Recommendations				
MPO Organizational Structure				
1. The MPO should continue to reach out to the Mashpee Wampanoag Tribe to ensure they are better represented at MPO Policy Board Meetings. As a voting member of the MPO Policy Board, CCMPO would benefit from the Mashpee Wampanoag Tribe's participation and insight.	MPO staff will reach out to the Mashpee Wampanoag Tribe in the Spring of 2022 and make all reasonable efforts to expand on relationships with the Tribe. MPO staff will expand outreach efforts with the Tribe.	MPO	Spring 2022	Ongoing. Staff has frequently reached out to the new Trial Chairman, new DPW director, and other trial contacts. Additional efforts are planned to build this relationship.

FHWA & FTA Findings	Planning Partners Response & Proposed Action	Responsibility	Target Date(s)	Status Update as of 7/31/2022
Metropolitan Transportation Plan				
2. The MTP's financial plan should include sufficient detail to convey the system-level estimates of costs and revenue sources to adequately operate and maintain the Federal-Aid highways and public transportation as well as identify how any forecasted revenues will be used to support implementation of the plan, for transit as well as for highways and bicycle and pedestrian needs.	The 2024 Cape Cod Regional Transportation Plan (RTP) is scheduled to be updated during FFY 2023. MPO staff will work with our partners at MassDOT and the CCRTA to identify and include system-level estimates of costs, revenue sources, and forecasted revenues in the financial plan of the 2024 RTP.	MPO, MassDOT, CCRTA	Winter/Spring 2023	Underway. Staff have begun the process for the 2024 RTP and anticipated completing the objective by the target date.
Transportation Improvement Program				
3. The financial plan portion of the TIP should be enhanced to more clearly demonstrate how a determination of fiscal constraint was made. This should include accounting for how transit revenues are forecast, what portion of available funds are anticipated to be in various federal programs or state funds, and a clear comparison should be provided showing, by year, that neither highway nor transit projects programmed in the TIP exceed the amount of revenues anticipated to be available.	The 2023-27 Transportation Improvement Plan (TIP) is scheduled to be updated in the Spring of 2022. MPO staff will work with our partners at MassDOT and the CCRTA to add additional detail to the fiscal constraint discussion and presentation of revenues and available funds in the 2023 TIP. These additions will be carried through on subsequent TIP documents.	MPO, MassDOT, CCRTA	Spring 2022	Complete. Staff added additional language to the FFY2023 TIP, specifically Table 18, Table 20, and the accompanying text. Additional refinements are planned for the next TIP cycle.

FHWA & FTA Findings	Planning Partners Response & Proposed Action	Responsibility	Target Date(s)	Status Update as of 7/31/2022
Non-Motorized Planning				
4. The MPO has done a good job at incorporating bicycle and pedestrian needs into their transportation planning processes, however, the MPO does not yet have a Regional Bicycle Plan. The MPO should continue to focus efforts towards finalizing a Regional Bicycle Plan, as this would be beneficial for the region.	MPO staff will present a draft and final Regional Bicycle Plan to the CCMPO for the benefit of the region.	MPO	Fall/Winter 2022	Underway. Staff have continued to work on the Regional Bicycle Plan and anticipate completing the objective by the target date.
Congestion Management Process / Management and Operations				
5. As CCMPO pursues studies to assess the effectiveness of completed TIP projects on safety, as well as analytical tools to monitor congestion across the region, the MPO should consult with other regional and statewide partners to explore options for developing an evaluation methodology that goes beyond the limited number of regionally prioritized projects in the TIP.	MPO staff will work with regional and statewide partners, including other MPOs and MassDOT, to identify strategies to incorporate analytic tools to monitor congestion in the region and inform the transportation planning process. MPO staff will apply these strategies to the development on the next CMP (as part of the 2024 RTP) and the development of TIP following the 2024 RTP.	MPO	Winter/ Spring 2023	Underway. Staff have explored the new data sets (including INRIX data through the RTIS platform) and have begun drafting an approach to incorporating the work into the TIP.
Congestion Management Process / Management and Operations				
6. The CMP should include a listing of congested areas that are prioritized based on severity. The CMP includes several data sources used to identify areas of concern, but the MPO should develop a methodology that systematically considers all the available data and generates a ranked list of	MPO staff will work with regional and statewide partners, including other MPOs and MassDOT, to identify strategies to incorporate analytic tools to monitor congestion in the region and inform the transportation planning process.	MPO	Winter/ Spring 2023	Underway. Staff have explored the new data sets (including INRIX data through the RTIS platform) and have begun drafting an approach to incorporating the work

FHWA & FTA Findings	Planning Partners Response & Proposed Action	Responsibility	Target Date(s)	Status Update as of 7/31/2022
congested locations across the region. This list could then be a decisionmaking tool for future UPWP studies and project level investments.	MPO staff will apply these strategies to the development on the next CMP (as part of the 2024 RTP) and the development of UPWP following the 2024 RTP.			into the 2024 RTP.
Environmental Mitigation				
7. The CCMPO should document their process for consultation with outside agencies, including developing a list of contacts and outlining roles and responsibilities of staff. The MPO clearly has developed strong relationships with stakeholders from various groups, and should memorialize the processes used to develop, retain, and enhance those relationships and how they relate to project consultation. This documentation should also demonstrate how the MPO gives explicit consideration and responsiveness to input received, both from consulting agencies and from the public.	MPO staff will work to improve documentation of the MPO consultation process to detail the contacts, staff roles, relationship building, and comment process. This information will be compiled, and a summary of environmental mitigation efforts will be documented in the appropriate federal certification documents beginning with the 2024 RTP, 2024 UPWP, and 2024-28 TIP.	MPO	Winter/ Spring 2023	Underway. Staff have begun working on work on revising consultation protocols and anticipate completing the objective by the target date.
Performance Based Planning and Programming				
8. The MPO has expanded their data collection activities greatly in recent years and the MPO should consider using this data to its full potential. The MPO should consider preparing the data in a more comprehensive way that helps to report on the progress and performance towards achieving both regional and federal targets on a recurring basis.	MPO staff will develop a performance measure dashboard to report on progress towards achieving regional and federal targets. MPO staff will launch the dashboard as part of the development of the 2024 RTP. The dashboard will be updated at a regular interval and will vary based on data availability, but no less than once every four years.	MPO	Winter/ Spring 2023	Underway. Staff have conducted a state of the practice of other MPO dashboards and have begun discussing approaches to roll out with the 2024 RTP process. Staff anticipate. completing the objective by the target date.

Appendix G: Federal Review Team

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Appendix H: Resources

Programmatic Area	Resource	Description
Metropolitan Transportation Plan	Greater Portland Council of Governments (GPCOG) Connect 2050 Long Range Transportation Plan	This planning document provides an exemplary demonstration of transit fiscal constrain, illustrated by appropriate financial strategies and investment tables; see Page 116-117 and 126-127 of the Connect 2050: Funding The Plan Section.
Performance Based Planning and Programming	Wasatch Front Regional Council's System Performance Report from their 2023-2050 Regional Transportation Plan	This report includes an evaluation of system performance with respect to the Federal performance targets and how the 2023-2050 RTP preferred scenario improves the performance of the transportation system. The progress descriptions include the performance data and associated performance target information that is available at the time of plan adoption.
	PBPP Implementation Roadmap	Outlines all the PBPP requirements and implementation guidelines and answer frequently asked questions.
	Model Long Range Transportation Plans – A Guide for Incorporating Performance Based Planning	Contains checklists and examples for integrating different PBPP requirements into the MTPs, including system performance reports.
	FTA PBPP Resources	Repository of variety of training resources to help states, MPOs and transit providers implement the requirements for national performance measures to comply with the Final Rule on Metropolitan and Statewide and Non-Metropolitan Planning.
	FHWA PBPP Resources	This website helps to define the characteristics of performance-based planning and programming and present the information that FHWA, FTA and their partners have developed to date.
Planning and Environment Linkages (PEL)	Environmental Review Toolkit: Planning and Environment Linkages	Repository of variety of training resources to help states, MPOs and transit providers implement PEL.

Appendix I: List of Acronyms

3C: Continuing, Cooperative, and Comprehensive
AADT: Average Annual Daily Traffic
ADA: Americans with Disabilities Act
AQ: Air Quality
BAT: Brockton Area Transit Authority
BIL: Bipartisan Infrastructure Law
CFR: Code of Federal Regulations
CMP: Congestion Management Process
DOT: Department of Transportation
EDC: Every Day Counts
EJ: Environmental Justice
FAST: Fixing America's Surface Transportation Act
FFY: Federal Fiscal Year
FHWA: Federal Highway Administration
FTA: Federal Transit Administration
HSIP: Highway Safety Improvement Program
ISTEA: Intermodal Surface Transportation Efficiency Act
LEP: Limited English Proficiency
LRTA: Lowell Regional Transit Authority
LRTP: Long Range Transportation Plan (also known as the "Metropolitan Transportation Plan")
MassDOT: Massachusetts Department of Transportation
MOU: Memorandum of Understanding
MPA: Metropolitan Planning Area
MPO: Metropolitan Planning Organization
MTP: Metropolitan Transportation Plan (also known as the "Long Range Transportation Plan")
NHS: National Highway System
NMCOG: Northern Middlesex Council of Governments
NMMPO: Northern Middlesex Metropolitan Planning Organization
OTP: Office of Transportation Planning (MassDOT)
PBPP: Performance Based Planning and Programming
PPP: Public Participation Plan
PTASP: Public Transportation Agency Safety Plan
SAFETEA-LU: Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
STIP: Statewide Transportation Improvement Program
TAM: Transit Asset Management
TAZ: Traffic Analysis Zones
TEC: Transportation Evaluation Criteria
TIP: Transportation Improvement Program
TMA: Transportation Management Area
TTTR: Truck Travel Time Reliability
UPWP: Unified Planning Work Program
U.S.C.: United States Code
USDOT: United States Department of Transportation
UZA: Urbanized Area
VPI: Virtual Public Involvement



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