



U.S. Department  
of Transportation

Federal Highway  
Administration

Federal Transit  
Administration

# Transportation Management Area Planning Certification Review

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## Huntsville Area Transportation Management Area



**May 2, 2025**

**FINAL Summary Report**





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## 1.0 EXECUTIVE SUMMARY

On Monday, March 17<sup>th</sup> and Tuesday, March 18<sup>th</sup>, 2025, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted the certification review of the transportation planning process for the Huntsville Area MPO urbanized area. FHWA and FTA are required to jointly review and evaluate the transportation planning process for each urbanized area over 200,000 in population at least every four years to determine if the process meets the Federal planning requirements.

### 1.1 Previous Findings and Disposition

The first certification review for the Huntsville Area MPO urbanized area was conducted in 2005. The second, third, and fourth certification reviews were conducted in 2009, 2013, 2017, and 2021, respectively. The previous certification review findings and their disposition are provided in Appendix B and summarized as follows.

Review Area	Finding	Action	Corrective Actions/ Recommendations/ Commendations	Resolution Due Date
Metropolitan Planning Area Boundaries 23 U.S.C. 134(e) 49 U.S.C. 5303(e) 23 CFR 450.312(a)	None	None	None	N/A
MPO Structure and Agreements 23 U.S.C. 134(d) 49 U.S.C. 5303(d) 23 CFR 450.314(a)	COOP does not include health-related emergency events, maintain meeting minutes are not accessible on the web	None	The MPO will update the COOP and UPWP	By December 2022
Unified Planning Work Program 23 CFR 450.308	None	None	None	N/A
Metropolitan Transportation Plan 23 U.S.C. 134(c), (h) and (i) 49 U.S.C. 5303(c), (h), and (i) 23 CFR 450.324	Comprehensive planning activities for 2050 Plan, System Performance Report	Corrective Action Commendation	LRTP does not include a System Performance Report (23 CFR 450.324 (f))	By December 2021
Transit Planning 49 U.S.C. 5303 23 U.S.C. 134 23 CFR 450.314	Transit Asset Management Plan	None	None	N/A



Transportation Improvement Program 23 U.S.C. 134(c),(h) and (j) 49 U.S.C. 5303(c), (h), and (j) 23 CFR 450.326	None	None	None	N/A
Public Participation 23 U.S.C. 134(i)(6) 23 CFR 450.316 & 450.326(b)	Virtual Public Involvement, effectiveness of public involvement activities	Commendation Recommendation	Diversify contact list in PPP; implement strategies for Virtual Public Involvement	By the next PPP update
Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324, Age Discrimination Act, Sec. 504 Rehabilitation Act, Americans with Disabilities Act	Title VI Guidelines and complaint process	Recommendation	Title VI Complaint Process to be made available on MPO website, establish project prioritization schedule	By the next Certification Review
Freight 23 U.S.C. 134(h) 23 CFR 450.306	None	None	None	N/A
Environmental Mitigation/Planning Environment Linkages 23 U.S.C. 134(i)(2)(D) 49 U.S.C. 5303(j)(2)(D) 23 CFR 450.324(f) (10) 23 U.S.C. 168 23 CFR Part 450 (Appendix A)	None	None	None	N/A
Non-motorized Planning/Livability 23 U.S.C. 134(h) 23 U.S.C. 217(g) 23 CFR 450.306 23 CFR 450.3224f) (2)	Greenway Plan, Bicycle Planning coordination	Commendation	Regional Greenway Plan (Singing River Trail) and B.A.S.C Citizen's group contribute to successful non-motorized planning in area	N/A
Congestion Management Process / Management and Operations 23 U.S.C. 134(k)(3) 49 U.S.C. 5303(k)(3) 23 CFR 450.322	CMP reports and local partnerships	Commendation Recommendation	Regional Commuter Study data provides MPO with visual analysis of current trends. MPO to enhance partnerships with the City of Huntsville and law enforcement to improve safety goals	By the next Certification Review



## 1.2 Summary of Current Findings

The current review found that the metropolitan transportation planning process conducted virtually for the Huntsville Area MPO is met with corrective actions on federal planning requirements.

As a result of this review, FHWA and FTA are certifying the transportation planning process conducted by the Alabama Department of Transportation (ALDOT), Huntsville Area Metropolitan Planning Organization (MPO) and City of Huntsville Public Transit and Madison County TRAMS are subject to addressing corrective actions. There are also recommendations in this report that warrant close attention and follow-up, as well as areas in which the MPO is performing very well in that are to be commended.

Review Area	Corrective Actions/ Recommendations/ Commendations	Finding	Resolution Due Date
Metropolitan Planning Area Boundaries 23 U.S.C. 134(e) 49 U.S.C. 5303(e) 23 CFR 450.312(a)	N/A	N/A	
MPO Structure and Agreements 23 U.S.C. 134(d) 49 U.S.C. 5303(d) 23 CFR 450.314(a)	Commendation	The MPO Staff conducted an MPO 101 session for recently for a newly elected member of the MPO Policy Board.	
Unified Planning Work Program  23 CFR 450.308	Corrective Action	The UPWP must contain an Indirect Cost Allocation Plan (ICAP) and/or Certificate of Indirect Costs, if the MPO uses federal funds for reimbursement of indirect costs. If the MPO does not request reimbursement for indirect costs, there must be a statement in the UPWP indicating that there are no Federal funds used for indirect costs.	The next UPWP update (FY 2026)
Unified Planning Work Program 23 CFR 450.308  2 CFR 200.403 and 2 CFR 200.405	Recommendation	According to 2 CFR 200.403 and 2 CFR 200.405, cost sharing approaches can be handled in two common ways: (a.) Direct Cost Allocation 50% of the cost is chargeable to MPO funds and 50% to another funding source (e.g., State/local funds or a separate Federal program) or (b) Indirect Cost Allocation	By FY 2029 Certification Review



		<p>for example, if software is part of an approved indirect cost pool, costs are distributed based on an indirect cost rate rather than being directly charged to MPO funds.</p> <p>Although the UPWP document list detailed transportation planning activities; the Huntsville Area MPO should include the Transit Asset Management Plan (TAM) and State of Good Repair Plan as specific planning activities in developing the UPWP.</p>	
<p>Metropolitan Transportation Plan 23 U.S.C. 134(c),(h), and (i) 49 U.S.C. 5303(c), (h), and (i)  23 CFR 450.324</p>	<p>Commendation</p>	<p>The Huntsville Area MPO is commended for the development of its new updated Transportation Regionally Innovative Projects for 2050 (<i>TRiP 2050</i>) long-range transportation (LRTP) document, which was adopted by the MPO Policy Board on March 19, 2025. Among the noteworthy components of <i>TRiP 2050</i> include: (1) an updated Congestion Management Process/Plan; (2) a robust System Performance Report; and (3) effective use of a variety of public involvement/participation/engagement/outreach techniques.</p>	
<p>Metropolitan Transportation Plan 23 U.S.C. 134(c), (h), and (i) 49 U.S.C. 5303(c), (h), and (i) 23 CFR 450.324</p>	<p>Recommendation</p>	<p>For its next LRTP update, the Huntsville Area MPO is encouraged to: (1) use and analyze additional geographic information system (GIS) layers focusing on other environmental factors (e.g., critical habitats); (2) examine (in collaboration with ALDOT) the approaches and methodologies used for developing outer year project cost estimates (beyond the TIP) to ensure all future fiscally-constrained project phases (e.g., right-of-way and utilities) are adequately addressed in those LRTP “outer year” cost estimates; (3) continue exploring opportunities that further bolster the methods and analyses used in its Congestion Management Process/Plan; and (4) assess the extent to which the streamlined approaches used in developing the updated <i>TRiP 2050</i> LRTP document were effective to ensure that large volumes of data/information are effectively conveyed while still appropriately addressing all applicable Federal requirements.</p>	<p>By FY 2029 Certification Review</p>
<p>Transit Planning 49 U.S.C. 5303 23 U.S.C. 134 23 CFR 450.314</p>	<p>N/A</p>	<p>N/A</p>	
<p>Transportation Improvement Program 23 U.S.C. 134(c), (h), and (j)</p>	<p>Recommendation</p>	<p>In meeting the Performance Measures and Targets outline in the document, Huntsville Area MPO should have PTASP and TAM (transit) progress achieved in linking investment priorities to those performance targets. In keeping with</p>	<p>By FY 2029 Certification Review</p>





49 U.S.C. 5303(c), (h), and (j) 23 CFR 450.326		the Huntsville Area MPO inflation rates discussion, the MPO should look at innovative funding to assist in project cost estimations.	
Public Participation 23 U.S.C. 134(i)(6) 49 U.S.C. 5303(i)(6)  23 CFR 450.316 and 23 CFR 450.326(b)	Commendation	The Federal Review Team commends the MPO for posting MPO meeting dates and times on the website along with “archived” quick links to Committee and Board resources that lead to past meeting minutes, agendas, and presentation materials. This makes it easier for members of the public to find out information that may aid in their ability and desire to participate in the MPO’s activities.	
Public Participation 23 U.S.C. 134(i)(6) 49 U.S.C. 5303(i)(6)  23 CFR 450.316 and 23 CFR 450.326(b)	Recommendation	The Federal Review Team recommends that the MPO consider the future update of the Public Participation Plan (PPP) to help promote continued public involvement beyond the required cyclical plan outreach, including the location-based efforts at public events and gatherings.	By the end of FY 2026 (July 2026)
Civil Rights Title VI Civil Rights Act 23 U.S.C. 324          Age Discrimination Act, Sec. 504 Rehabilitation Act, and Americans with Disabilities Act	Commendation	<ul style="list-style-type: none"><li>• The Huntsville Area MPO exemplified successful outreach efforts resulting in great public participation across most of its zip codes and across diverse demographics during their Long-Range Transportation Plan public involvement phase, all of which was well documented.</li><li>• The Huntsville Area MPO mentioned at least three ADA, elderly, and disability advocacy groups employed on their Vision Zero Task Force, as members of its MPO Policy Board, and as being very active and engaged during its MPO meetings.</li><li>• Trey Riley, City of Huntsville Attorney and supervisor of the MPO ADA Coordinator is a member of the Huntsville Area MPO Policy Board.</li><li>• Huntsville Area MPO staff members recently attended PROWAG training, and they make use of accessible public buildings for its public involvement meetings, all of which was well documented.</li><li>• The Huntsville Area MPO has updated demographic and age 65+ maps on its website that are frequently referenced during planning phases.</li></ul>	
Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324  Age Discrimination Act, Sec. 504	Recommendation	<ul style="list-style-type: none"><li>• The PPP should be updated by the end of FY 2026 (July 2026).</li><li>• The ADA Transition Plan should remove the reference in Appendix D to an inventory of barriers found in Appendix B since there is no inventory of barriers.</li><li>• The Huntsville Area MPO should document its</li></ul>	By FY 2029 Certification Review



Rehabilitation Act, and Americans with Disabilities Act		internal controls to ensure nondiscrimination (e.g., document Title VI analyses of proposed plans; communicate findings of Title VI analyses in meetings and show transparency of results with the public).	
Consultation and Coordination 23 U.S.C. 134(g) and (i) 49 U.S.C. 5303(g) and (i) 23 CFR 450.316, 23 CFR 450.324(g)	Recommendation	ALDOT, ADEM, and the MPO should cooperatively formalize, expand, and replicate the environmental consultation process that is available to the Huntsville Area MPO statewide.	By FY 2029 Certification Review
List of Obligated Projects 23 U.S.C. 134(j)(7) 49 U.S.C. 5303(j)(7)  23 CFR 450.334	Recommendation	The annual listing of obligated projects (ALOP) should be a standalone document that is easy for the public to understand consistent with the provisions in 23 CFR 450.334, with ALDOT and MPO projects separated to show the public how the various projects are funded and being advanced toward implementation.	By FY 2029 Certification Review
Freight 23 U.S.C. 134(h) 23 CFR 450.306	N/A	N/A	
Environmental Mitigation/Planning and Environment Linkages 23 U.S.C. 134(i)(2)(D) 49 U.S.C. 5303(j)(2)(D) 23 CFR 450.324(f)(10) 23 U.S.C. 168 23 CFR Part 450 (Appendix A)	Corrective Action	For its next LRTP update, the Huntsville Area MPO must include a more robust discussion of potential environmental mitigation activities and potential areas for carrying-out those activities (focused on policies, programs, strategies, or at the project-level), consistent with 23 CFR 450.324(f)(10) and including: (1) identification of potential environmental mitigation activities; (2) consultation with applicable Federal, State, and Tribal land management, wildlife, and regulatory agencies to evaluate the value of regional versus individual project mitigation; (3) identification of whether/how various types of impacts can be mitigated off-site and/or regionally; and (4) identification and analysis of activities having the greatest potential to restore and maintain the region's environmental functions affected by the LRTP.	By FY 2029 Certification Review
Environmental Mitigation/Planning and Environment Linkages 23 U.S.C. 134(i)(2)(D) 49 U.S.C. 5303(j)(2)(D) 23 CFR 450.324(f)(10)	Recommendation	Identify plan mitigation. Analyze the potential plan impacts to environmental resources. Analyze what is currently being done for some resources. Determine if there are plan impacts to resources that can be mitigated off-site and/or regionally. Identify in plan why or why not types of impacts can be mitigated off site and/or regionally. Work with the resource agency to evaluate value of regional versus individual project mitigation. Identify potential mitigation	By FY 2029 Certification Review



23 U.S.C. 168		in the Huntsville Area MPO region and a plan on implementing the mitigation strategies and techniques.  The Huntsville Area MPO could host an Environmental Roundtable that includes regional staff from member jurisdictions and partner organizations to examine projects through environmental lens; utilizing watershed management authorities, US Fish and Wildlife Services, Riverkeeper organizations, and possibly water/land preservations agencies like the Land Trust of North Alabama.	
23 CFR Part 450 (Appendix A)			
Transportation Safety 23 U.S.C. 134(h)(1)(B) 49 U.S.C. 5303(h)(1)(B) 23 CFR 450.306(a)(2) 23 CFR 450.306(d) 23 CFR 450.324(h)	Recommendation	The MPO should have a review process with local partners to determine if any FHWA Proven Safety Countermeasures would be appropriate to be included for every project.	By FY 2029 Certification Review.
Transportation Security Planning 23 U.S.C. 134(h)(1)(c) 49 U.S.C. 5303(h)(1)(c) 23 CFR 450.306(a)(3) 23 CFR 450.306(d) 23 CFR 450.324(h)	N/A	N/A	
Nonmotorized Planning/Livability 23 U.S.C. 134(h) 23 U.S.C. 217(g) 23 CFR 450.306 23 CFR 450.3224f)(2)	N/A	N/A	
Integration of Land Use and Transportation 23 U.S.C. 134(g)(3) 23 U.S.C. 134 (h)(1)(E) 49 U.S.C. 5303(g)(3) 49 U.S.C. 5303(h)(1)(E) 23 CFR 450.306(a)(5)	Recommendation	To support the continued growth and help ensure projects move forward without unnecessary delays, future LRTP updates should include a right-of-way (ROW) planning framework that: (1) identifies potential ROW needs early in the planning process to reduce downstream impacts; (2) establishes a clear approach to coordinating with local agencies, utility providers, and environmental stakeholders; and (3) offers practical tools—like planning assumptions, map-based guidance, and early decision-making triggers—to help anticipate and manage ROW needs proactively.	By FY 2029 Certification Review



		This framework would enhance collaboration across agencies and reduce the risk of costly delays—especially important for a rapidly growing region like Huntsville.	
Travel Demand Forecasting 23 CFR 450.324(f)(1)	N/A	N/A	
Air Quality Clean Air Act 42 U.S.C. 7401 40 CFR Part 93 23 CFR 450.324(m)	N/A	N/A	
Congestion Management Process / Management and Operations 23 U.S.C. 134(k)(3) 49 U.S.C. 5303(k)(3)  23 CFR 450.322	Commendation	In response to the Recommendation from the previous TMA Certification Review, the Huntsville Area MPO is commended for updating its Congestion Management Process/Plan as part of its new updated Transportation Regionally Innovative Projects for 2050 ( <i>TRiP 2050</i> ) long-range transportation (LRTP) document that was adopted by the MPO Policy Board on March 19, 2025. Notably, the updated CMP discusses how the various highway and transit projects in <i>TRiP 2050</i> align with ALDOT's other associated plans and performance measures/targets, consistent with the MPO's updated LRTP System Performance Report.	
Congestion Management Process / Management and Operations 23 U.S.C. 134(k)(3) 49 U.S.C. 5303(k)(3) 23 CFR 450.322	Recommendation	In the spirit of continuous process improvement, the Huntsville Area MPO is encouraged to continue exploring opportunities that further bolster the methods and analyses used in its Congestion Management Process/Plan when developing its next LRTP update.	Before completion/adoption of the next LRTP update (no later than March 19, 2030)

Details of the certification findings for each of the above items are contained in this report.



## **2.0 INTRODUCTION**

### **2.1 Background**

Pursuant to 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMAs) at least every four years. A TMA is an urbanized area, as defined by the U.S. Census Bureau, with a population of over 200,000. After the 2010 Census, the Secretary of Transportation designated 183 TMAs – 179 urbanized areas with over 200,000 in population plus four urbanized areas that received special designation. In general, the reviews consist of three primary activities: a site visit, a review of planning products (in advance of and during the site visit), and preparation of a Certification Review Report that summarizes the review and offers findings. The reviews focus on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the MPO(s), the State DOT(s), and public transportation operator(s) in the conduct of the metropolitan transportation planning process. Joint FTA/FHWA Certification Review guidelines provide agency field reviewers with latitude and flexibility to tailor the review to reflect regional issues and needs. As a consequence, the scope and depth of the Certification Review reports will vary significantly.

The Certification Review process is only one of several methods used to assess the quality of a regional metropolitan transportation planning process, compliance with applicable statutes and regulations, and the level and type of technical assistance needed to enhance the effectiveness of the planning process. Other activities provide opportunities for this type of review and comment, including Unified Planning Work Program (UPWP) approval, the MTP, metropolitan and statewide Transportation Improvement Program (TIP) findings, air-quality (AQ) conformity determinations (in nonattainment and maintenance areas), as well as a range of other formal and less formal contact provide both FHWA/FTA an opportunity to comment on the planning process. The results of these other processes are considered in the Certification Review process.

While the Certification Review report itself may not fully document those many intermediate and ongoing checkpoints, the “findings” of Certification Review are, in fact, based upon the cumulative findings of the entire review effort.

The review process is individually tailored to focus on topics of significance in each metropolitan planning area. Federal reviewers prepare Certification Reports to document the results of the review process. The reports and final actions are the joint responsibility of the



appropriate FHWA and FTA field offices, and their content will vary to reflect the planning process reviewed whether or not they relate explicitly to the formal “findings” of the review.

To encourage public understanding and input, FHWA/FTA will continue to improve the clarity of the certification review reports.

## **2.2 Purpose and Objective**

Since the enactment of the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, the FHWA and FTA, have been required to jointly review and evaluate the transportation planning process in all urbanized areas over 200,000 population to determine if the process meets the Federal planning requirements in 23 U.S.C. 134, 40 U.S.C. 5303, and 23 CFR 450. The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), extended the minimum allowable frequency of certification reviews to at least every four years.

The Metropolitan Planning Organization of the Huntsville Area MPO is the designated MPO for the Huntsville urbanized area. Alabama Department of Transportation (ALDOT) is the responsible state agency. The Department of Parking and Public Transportation of the City of Huntsville and Madison County’s transit program, which is also known as Transportation for Rural Areas of Madison County (TRAM) are the responsible public transportation operators. Current membership of the Huntsville Area MPO consists of elected officials and citizens from the political jurisdictions in the City of Huntsville, the City of Madison, Madison County, the Town of Owens Cross Roads, and the Town of Triana. The study area includes the geographic area of all the aforementioned cities and towns with the City of Huntsville as the largest population center.

Certification of the planning process is a prerequisite to the approval of Federal funding for transportation projects in such areas. The certification review is also an opportunity to provide assistance on new programs and to enhance the ability of the metropolitan transportation planning process to provide decision makers with the knowledge they need to make well-informed capital and operating investment decisions.

## **3.0 SCOPE AND METHODOLOGY**

### **3.1 Review Process**

The initial certification review was conducted in 2005. Subsequent certification reviews were conducted in 2009, 2013, 2017, and 2021. A summary of the status of findings from the last review is provided in Appendix B. This report details the most recent review, which consisted of

a desk audit, a virtual site visit, and a public involvement opportunity, conducted in March 2025.

Participants in the review included representatives of FHWA, FTA, ALDOT, the Department of Parking and Public Transportation of the City of Huntsville, and the Huntsville Area MPO staff. A complete list of participants is included in Appendix A.

A desk audit of current documents and correspondence was completed prior to the virtual site visit. In addition to the formal review, routine oversight mechanisms provide a major source of information upon which to base the certification findings.

The certification review covers the transportation planning process conducted cooperatively by the MPO, State, and public transportation operators. Background information, current status, key findings, and recommendations are summarized in the body of the report for the following subject areas selected by FHWA and FTA staff for virtual review:

- Metropolitan Planning Area Boundaries
- MPO Structure and Agreements
- Unified Planning Work Program (UPWP)
- Long Range Transportation Plan (LRTP)/Metropolitan Transportation Plan (MTP)
- Transit Planning
- Transportation Improvement Program (TIP)
- Public Participation (PPP)
- Civil Rights (Title VI and ADA)
- Consultation and Coordination
- List of Obligated Projects
- Freight Planning
- Environmental Mitigation/Planning Environmental Linkage
- Transportation Safety
- Nonmotorized Planning/Livability
- Integration of Land Use and Transportation
- Travel Demand Forecasting
- Congestion Management Process / Management and Operations

## **3.2 Documents Reviewed**

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



- Huntsville Area MPO Annual Obligated Projects Reports 2023
- Huntsville Area MPO Annual Obligated Projects Report 2022
- Huntsville Area MPO Annual Obligated Projects Report 2021
- Huntsville MPO Bikeway Plan Final
- The Huntsville Development Review Regional Edition 2023 Final
- Huntsville Area Regional Commuter Study October 2020
- FINAL 2018 Public Participation Plan
- The Huntsville-Area MPO ADA Transition Plan Final
- Final Report Huntsville High-Capacity Transit April 2022
- GO Huntsville Transit Final Report January 2023
- FINAL FY 2024 – 2027 Transportation Improvement Program
- Huntsville Area MPO Transportation Regionally Innovative Projects for 2045 (**TRiP 2045**)
- Huntsville Area MPO Transportation Regionally Innovative Projects for 2050 (**TRiP 2050**)
- FY 2025 Huntsville-Area Metropolitan Planning Organization (MPO) DRAFT Unified Planning Work Program (UPWP)
- 2015 Huntsville Area MPO 3-C Agreement Signed
- Huntsville Area MPO CAC Bylaws
- Huntsville Area MPO MPO Policy Board Bylaws
- Huntsville Area MPO TCC Bylaws





## **4.0 PROGRAM REVIEW**

### **4.1 Metropolitan Planning Area Boundaries**

#### **4.1.1 Regulatory Basis**

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

#### **4.1.2 Current Status**

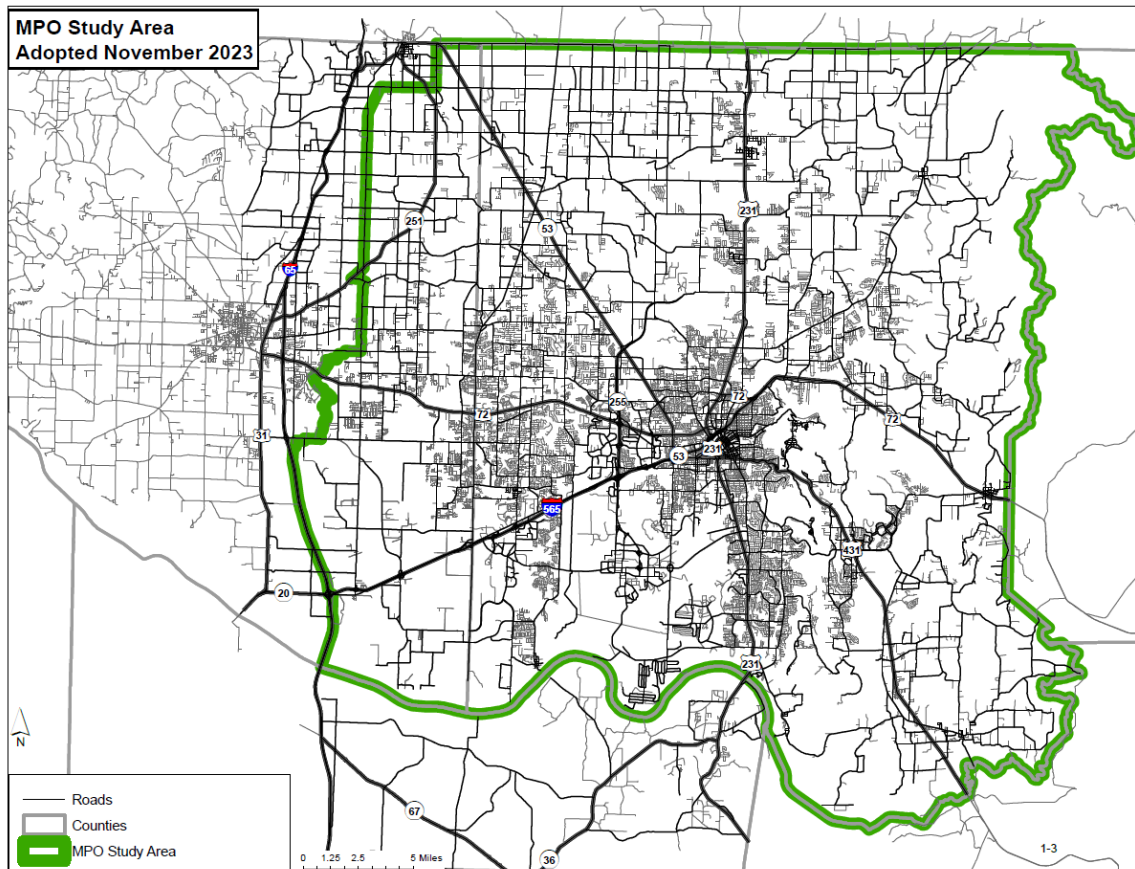
The Metropolitan Planning Organization (MPO) of the Huntsville Area Transportation Study (HATS), also known as the Huntsville Area MPO, was officially designated in 1976. The Huntsville urbanized area was designated by the Secretary of the U.S. Department of Transportation (USDOT) as a Transportation Management Area (TMA) in 2002.

The Urbanized Area (UZA) and Metropolitan Planning Area (MPA) Boundaries have been adjusted for the 2020 Census in November 2023. The UZA was expanded to include additional newly developed areas since the previous certification review in 2021. The MPA, for the most part, is growing rapidly. The City of Huntsville had an estimated population of 235,688 in 2024, making it the second-most populous metropolitan area in Alabama. The most up-to-date Huntsville UZA and MPA boundaries are shown below.



MPO Official Name: Huntsville Area Transportation Study (HATS)

MPO Area Boundaries:



Population Served: 432,479

#### 4.1.3 Findings

**Commendation:** None

**Corrective Action:** None

**Recommendations:** None

**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** N/A

## **4.2 MPO Structure and Agreements**

### **4.2.1 Regulatory Basis**

23 U.S.C. 134(d), 49 U.S.C. 5303(d), and 23 CFR 450.314(a) state the MPO, the State, and the public transportation operator shall cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process. These responsibilities shall be clearly identified in written agreements among the MPO, the State, and the public transportation operator serving the MPA.

### **4.2.2 Current Status**

The Metropolitan Planning Organization (MPO) of the Huntsville Area Transportation Study (HATS), also known as the Huntsville Area MPO, was founded in 1976. The official name of the MPO is Huntsville Area Transportation Study. The MPO is housed within the City of Huntsville and staffed by four (4) employees who are responsible for assisting in the completion of all required planning and programming of the transportation system for the Huntsville MPA.

Huntsville Area MPO is the lead agency responsible for determining overall policy affecting long-range and short-range transportation programs and plans for the TMA. The MPO Policy Board is composed of seven (7) voting members and four (4) non-voting members. Voting membership consists of (each member has one vote):

- City of Huntsville - 2 members
- City of Madison - 1 member
- Madison County - 1 member
- Town of Owens Cross Roads - 1 member
- Town of Triana - 1 member
- ALDOT North Region - 1 member

Non-voting membership consists of:

- TOP of Alabama Regional Council of Governments (TARCOG) - 1 member
- FTA - 1 member
- FHWA - 1 member
- ALDOT Local Transportation Bureau - 1 member

The MPO Policy Board meets at least once a quarter. The two advisory committees associated with the transportation planning process in the Huntsville Area MPO include a Technical



Coordinating Committee (TCC) and a Citizens Advisory Committee (CAC). Prior to making decisions, the MPO Policy Board receives technical guidance from the TCC and structured citizen input from the CAC.

The Department of Parking and Public Transportation of the City of Huntsville is the main transit provider for the City of Huntsville. Madison County's transit program, Transportation for Rural Areas of Madison County (TRAM), is the main transit provider for demand response service in Madison County. The Department of Parking and Public Transportation of the City of Huntsville uses FTA formula funds to provide transit services for its respective areas. The Mayor of Huntsville and the Chairman of the Madison County Commission serve as the transit representatives through the MPO Policy Board.

The MPO has two active agreements, one Memorandum of Understanding (MOU) and three bylaws. The first agreement is between the MPO membership governments and the State of Alabama regarding the "3C Planning Process". The second agreement is between the State of Alabama and the City of Huntsville regarding the administration of USDOT transportation planning funds. The MOU is between the MPO and the Department of Parking and Public Transportation of the City of Huntsville regarding transit planning. The MPO bylaws briefly describe the functions and duties of the Citizen Advisory Committee (CAC), Technical Coordinating Committee (TCC), and MPO Policy Board.

During the virtual site visit, the Federal Team had a discussion with the MPO elected officials about the current transportation planning process of the MPO. The discussion focused on and emphasized the importance of engagement and participation from all MPO members in order for the planning process to be better understood, and therefore more effective.

#### **4.2.3 Findings**

- The MPO Policy Board and sub-committees have pre-scheduled meetings listed on their website.
- Local officials who serve on the MPO Policy Board appoint members of the CAC.

#### **Commendation:**

- The MPO Staff conducted an MPO 101 session for recently for a newly elected member of the MPO Policy Board.

#### **Corrective Action:** None.

#### **Recommendations:** None.



**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** FHWA and FTA will provide technical assistance as requested.

## **4.3 Unified Planning Work Program**

### **4.3.1 Regulatory Basis**

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

### **4.3.2 Current Status**

The Huntsville Area MPO developed its UPWP to include activities that will help the MPO staff not only meet the requirements of the 3-C transportation planning process in accordance with the IIJA/BIL, but also accomplish the planning priorities established for the region. The Huntsville Area MPO develops the Unified Planning Work Program (UPWP) annually. The Huntsville Area MPO Policy Board adopted the Draft FY2025 UPWP on August 7, 2024.

The established planning priorities focus on local and regional issues in response to the ongoing development throughout the Huntsville Metro Area, including a number of regionally significant transportation projects. The following are some planning activities the MPO programmed in the UPWP for Fiscal Year (FY) 2025:

- Transportation Improvement Program (TIP)
- Long Range Transportation Plan (LRTP)
- Unified Planning Work Program (UPWP)
- Congestion Management Plan (CMP)
- Air Quality Planning (in the event of air quality non-conformity)
- Data Collection and Analysis
- Bicycle and Pedestrian Planning
- Transit Planning
- Regional Plans and Programs



- Public Participation Process
- Title VI and the American Disability Act (ADA)

The MPO programmed approximately a total of \$1,329,769 for the FY 2025 UPWP including the two primary sources of federal planning funds: FHWA's Metropolitan Planning (PL) funds and FTA's Section 5303 Metropolitan Planning Program funds, along with local matching funds.

#### **4.3.3 Findings**

The Federal Review Team finds the Huntsville Area MPO is non-compliant with the requirements of 23 CFR 450.308(f) and 23 CFR 420.113(b). Although the document contains a brief introductory narrative, listing of work tasks with sufficient detail, and full annual budget; it does not include an Indirect Cost Allocation Plan and no Certificate of Indirect Costs, which is required if the MPO seeks reimbursement for indirect costs.

The document includes various budget allocations for transportation planning activities listed with sufficient descriptive data and a summary financial table which is compliant. However, it is **unclear whether indirect costs**, such as administrative overhead, **are consistently allocated** across the board. For instance, after reviewing the sample invoice package, it was unclear how items are procured and what benefits are received. Software was purchased; however, it wasn't clear how the cost was assigned and whether employees at 100% or 50% all used the software.

**Commendation:** None

**Corrective Action:** The UPWP must contain an Indirect Cost Allocation Plan (ICAP) and/or Certificate of Indirect Costs, if the MPO uses Federal funds for reimbursement of indirect costs. If the MPO does not request reimbursement for indirect costs, there must be a statement in the UPWP indicating that there are no federal funds used for indirect costs.

#### **Recommendations:**

- 1) According to 2 CFR 200.403 and 2 CFR 200.405, cost sharing approaches can be handled in two common ways:

##### **A. Direct Cost Allocation**

50% of the cost is charged to MPO funds and 50% to another funding source (e.g., State/local funds or a separate Federal funding program).

##### **B. Indirect Cost Allocation**

As an example, if software is part of an approved indirect cost pool, costs are distributed based on an indirect cost rate rather than being directly charged to MPO funds.

- 2) Although the UPWP document list detailed transportation planning activities; the Huntsville Area MPO should include the Transit Asset Management Plan (TAM) and State of Good Repair Plan as specific planning activities in developing the UPWP.

**Schedule for Process Improvement:** FY 2026 UPWP (September 2025).

**Proposed FHWA/FTA Technical Assistance:** FHWA and FTA can provide technical assistance or an example ICAP and/or Certificate of Indirect Costs to the MPO upon request. The assigned FHWA Planner will assist the Huntsville Area MPO staff upon request in creating an ICAP and/or certificate of indirect costs.

## **4.4 Metropolitan Transportation Plan**

### **4.4.1 Regulatory Basis**

23 U.S.C. 134(c), (h) and (i), 49 U.S.C. 5303(c), (h), and (i), and 23 CFR 450.324 set forth requirements for the development and content of the Metropolitan Transportation Plan (MTP). Among the requirements are that the MTP address at least a 20-year planning horizon and that it includes both long- and short-range strategies that lead to the development of an integrated and multi-modal system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.

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

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

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

- Projected transportation demand
- Existing and proposed transportation facilities
- Operational and management strategies
- Congestion management process



- Capital investment and strategies to preserve transportation infrastructure and provide for multimodal capacity.
- Design concept and design scope descriptions of proposed transportation facilities.
- Potential environmental mitigation activities
- Pedestrian walkway and bicycle transportation facilities
- Transportation and transit enhancements
- A financial plan

#### **4.4.2 Current Status**

The Metropolitan Transportation Plan (*Transportation Regionally Innovative Projects for 2045 (TRiP 2045)*) was initially adopted by the Huntsville MPO Policy Board on April 22, 2020. This document was created to streamline the previous 2040 Long Range Transportation Plan (LRTP) adopted in 2015.

*TRiP 2045* was later amended on September 24, 2021 (to include the Congestion Management Plan changes based on the Regional Commuter Study), August 17, 2022 (to include the System Performance Report), and May 17, 2023 (to include the University-Medical Bus Rapid Transit (BRT) corridor as the locally preferred alternative for the Pilot Bus Rapid Transit (BRT) project conceptually defined when *TRiP 2045* was initially adopted by the MPO).

The Huntsville Area MPO had been working on its next MTP update (*Transportation Regionally Innovative Projects for 2050 (TRiP 2050)*), which streamlined the process to make it even more user-friendly for the public. The Huntsville Area MPO previously made the Draft *TRiP 2050* LRTP document available on its website and created an online survey to obtain feedback/comments from the public until January 3, 2025. Meanwhile, the Draft *TRiP 2050* LRTP document was considered by the Huntsville Area MPO Policy Board at its meeting on December 4, 2024. Before the Final *TRiP 2050* LRTP document was presented to the MPO Policy Board at its March 19, 2025, meeting for approval/adoption, the MPO planned several public involvement meetings in January and February 2025 to provide the public additional opportunities to offer comments above-and-beyond the online survey.

Since the virtual site visit, the Huntsville Area MPO has adopted its MTP update (*Transportation Regionally Innovative Projects for 2050 (TRiP 2050)*) on Wednesday March 19, 2025.

#### **4.4.3 Findings**

The Huntsville Area MPO completed the development of its new updated *Transportation Regionally Innovative Projects for 2050 (TRiP 2050)* long-range transportation (LRTP) document, which was adopted by the MPO Policy Board on March 19, 2025. The LRTP





development process and resulting product satisfactorily address all applicable FHWA/FTA statutory and regulatory requirements of 23 CFR 450.324.

**Commendation:** The Huntsville Area MPO is commended for the development of its new updated *Transportation Regionally Innovative Projects for 2050 (TRiP 2050)* long-range transportation (LRTP) document, which was adopted by the MPO Policy Board on March 19, 2025. Among the noteworthy components of *TRiP 2050* include: (1) an updated Congestion Management Process/Plan; (2) a robust System Performance Report; and (3) effective use of a variety of public involvement/participation/engagement/outreach techniques.

**Corrective Action:** None.

**Recommendations:** For its next LRTP update, the Huntsville Area MPO is encouraged to: (1) use and analyze additional geographic information system (GIS) layers focusing on other environmental factors (e.g., critical habitats); (2) examine (in collaboration with ALDOT) the approaches and methodologies used for developing “outer year” project cost estimates (beyond the TIP) to ensure all future fiscally-constrained project phases (e.g., right-of-way and utilities) are adequately addressed in those LRTP “outer year” cost estimates; (3) continue exploring opportunities that further bolster the methods and analyses used in its Congestion Management Process/Plan; and (4) assess the extent to which the streamlined approaches used in developing the updated *TRiP 2050* LRTP document were effective to ensure that large volumes of data/information are effectively conveyed while still appropriately addressing all applicable Federal requirements.

**Schedule for Process Improvement:** The Huntsville Area MPO should implement the recommendations before the completion/adoption of the next LRTP update (no later than March 19, 2030).

**Proposed FHWA/FTA Technical Assistance:** FHWA and FTA are available to provide technical assistance, as requested.

## **4.5 Transit Planning**

### **4.5.1 Regulatory Basis**

49 U.S.C. 5303 and 23 U.S.C. 134 require the transportation planning process in metropolitan areas to consider all modes of travel in the development of their plans and programs. Federal regulations cited in 23 CFR 450.314 state that the MPO in cooperation with the State and



operators of publicly owned transit services shall be responsible for carrying out the transportation planning process.

#### **4.5.2 Current Status**

The City of Huntsville Transit staff currently operates 11 fixed routes and owns/maintains 25 paratransit vehicles with 19 vehicles utilized during peak hours. The transit staff has shared the ridership has rebounded to 95% of pre-COVID ridership levels- a significant achievement. The Huntsville Area MPO has undertaken several transit-related studies in recent years. Notably, the Regional Transit Study assessed needs and identified two potential corridors: University/Medical BRT and Airport Bus Service. Additionally, the MPO and Transit staff shared plans for the 2027/2028 Huntsville Transit Improvement Plan, which will begin development with the FY 2026 Unified Planning Work Program (UPWP). Recommendations from this improvement plan will be incorporated into the Long-Range Transportation Plan (LRTP) and the Transportation Improvement Program (TIP). Furthermore, Huntsville recently secured an \$850,000 FTA Transit-Oriented Development (TOD) Planning Grant, underlining their commitment to enhancing regional transit infrastructure.

#### **4.5.3 Findings**

The MPO's transit activities satisfy the federal requirements as outlined in 49 CFR 613.100 as well as the transit supportive elements outlined in 23 CFR 450.

The Huntsville Area MPO and Huntsville Transit staff collaborate closely on transit system performance management. For example, the staff of the MPO and Transit agency participate in regular coordination meetings regarding Public Transportation Agency Safety Plans (PTASP), presenting annual updates to the MPO Policy Board. MPO staff also assist Huntsville Transit staff in developing and tracking performance metrics for the Transit Asset Management (TAM) Plan. Moreover, Huntsville Transit and the MPO work together on statistical analyses supporting FTA Triennial Reviews, ensuring compliance and effective performance monitoring.

**Commendation:** The Huntsville Area MPO and City of Huntsville and Transit staff examine opportunities to collaborate and effectively improve the state of public transit in Huntsville. Their efforts have yielded results including increased ridership numbers and a Transit- Oriented Development Grant (TOD) grant from the Federal Transit Administration (FTA).

**Corrective Action:** None.

**Recommendations:** None.

### **Schedule for Process Improvement:**

**Proposed FHWA/FTA Technical Assistance:** FHWA and FTA will provide technical assistance as requested.

## **4.6 Transportation Improvement Program**

### **4.6.1 Regulatory Basis**

23 U.S.C. 134(c), (h), and (j) and 49 U.S.C. 5303(c), (h), and (i) set forth requirements for the MPO to cooperatively develop a Transportation Improvement Program (TIP). Under 23 CFR 450.326, the TIP must meet the following requirements:

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

### **4.6.2 Current Status**

The Huntsville Area MPO Policy Board adopted the current FY 2024-2027 TIP on August 16, 2023. The TIP is a prioritized list of funded transportation projects for a four-year period. Regionally significant projects that will be fully or partially funded with FHWA, FTA, state, local, and other federal funds are included in the TIP. The System Performance Report found in the MPO TIP outlines the State of Alabama's adopted targets and maintains data on required performance measures and targets, progress achieved in meeting the targets for Safety Performance Measures (PM1), Bridge/Pavement Performance Measures (PM2), and System Performance Measures (PM3), in which the Huntsville Area MPO adopts as its own.



### **4.6.3 Findings**

During desk review, it was found that projects in the TIP are financially constrained each fiscal year and can be implemented using current and proposed revenue sources that are reasonably expected to be in place when needed (with existing and anticipated revenues being the basis for the ALDOT Work Program and local Capital Improvement Plans). However, neither that section nor any of the project listings/tables clearly articulate whether and/or how revenue and cost estimates for the TIP are based upon an inflation rate(s) to reflect “year of expenditure (YOE) dollars” based on reasonable financial principles and information, developed cooperatively by the MPO, States, and public transportation operators (pursuant to 23 CFR 450.326(j)).

During the virtual site visit, it was found that ALDOT provides the cost estimates, and uses a one percent inflation rate, which is conservative when looking at the project cost projections. The Huntsville Area MPO also made known that it releases TIP project information which is readily available on its website archives. The Huntsville Area MPO also has a Project Status listing, that carries approximately 60 projects and includes their percentage of completeness, a location map for each project, and is updated once a month. Local officials respond well to this listing.

The Federal Review Team finds the Huntsville Area MPO in compliance with 23 CFR 450.326.

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** In meeting the Performance Measures and Targets outline in the document, Huntsville Area MPO should have PTASP and TAM (transit) progress achieved in linking investment priorities to those performance targets. In keeping with the Huntsville Area MPO inflation rates discussion, the MPO should look at innovative funding to assist in project cost estimations.

**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** FHWA and FTA will provide technical assistance as requested.



## **4.7 Public Participation**

### **4.7.1 Regulatory Basis**

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

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

### **4.7.2 Current Status**

The Huntsville Area MPO currently operates from the 2018 Public Participation Plan (PPP). The PPP defines the regional process to provide citizens, stakeholder groups, and other interested parties with reasonable opportunities to be involved in the transportation planning process.

In response to the COVID-19 pandemic, the Huntsville Area MPO was able to transition smoothly to an online meeting format that offered an additional avenue for participation at regular meetings. Similar to other MPOs, the Huntsville Area MPO discovered that the online meeting option often led to increased responses and questions from attendees.

### **4.7.3 Findings**

The Huntsville Area MPO substantially meets the requirements listed under 23 CFR 450.316. While the Huntsville Area MPO's current Public Participation Plan lists several public outreach and education strategies as well as evaluation strategies, several of those strategies are now outdated. The Huntsville Area MPO mentioned updating the PPP as a specific task/deliverable within its FY2026 UPWP task.

The MPO's website is directly managed by MPO staff. The MPO continues to regularly review and update website activity and track public input, and traditional outreach with interactive

kiosks are common at local community events. The MPO maintains an extensive database of multicultural, charity, and faith-based organizations to reach underserved populations.

The Public Hearing component of this TMA Certification Review was conducted virtually via MS-TEAMS. Members of the public and the CAC, which is made up of citizens, connected and provided feedback/comments to the Federal Review Team. Those comments were recorded and can be found in the Appendix C of this document.

**Commendation:** The Federal Review Team commends the MPO for posting MPO meeting dates and times on the website along with ‘archived’ quick links to MPO Committee and Board resources that lead to past meeting minutes, agendas, and presentation materials. This makes it easier for members of the public to find out information that may aid in their ability and desire to participate in the MPO’s activities.

**Corrective Action:** None.

**Recommendations:** As mentioned in the 2021 Certification recommendations, the Federal Review Team recommends that the MPO consider the future update of the Public Participation Plan (PPP) to help promote continued public involvement beyond the required cyclical plan outreach, including the location-based efforts at public events and gatherings.

**Schedule for Process Improvement:** By the end of FY 2026 (July 2026)

**Proposed FHWA/FTA Technical Assistance:** FHWA and FTA can provide examples of effective public involvement practices and plans upon request.

## **4.8 Civil Rights (Title VI and ADA)**

### **4.8.1 Regulatory Basis**

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

programs and activities funded with Federal dollars are prohibited from discrimination based on disability.

#### **4.8.2 Current Status**

The Huntsville Area MPO currently relies upon the City of Huntsville's legal department for its official Title VI and ADA Coordinator. The Huntsville Area MPO has not received any Title VI complaints or ADA complaints since the last (2021) TMA Certification. The Huntsville Area MPO coordinates with the Public Transit Department on triennial reviews with FTA concerning Title VI and ADA coordination.

#### **4.8.3 Findings**

The Huntsville Area MPO is carrying out the metropolitan transportation planning process in accordance with all applicable requirements of Title VI of the Civil Rights Act of 1964 and 49 CFR 21 and is complying with the ADA's Title II requirements (28 CFR Part 35) and Section 504 of the Rehabilitation Act.

#### **Commendation:**

- The Huntsville Area MPO exemplified successful outreach efforts resulting in great public participation across most of its ZIP codes and across diverse demographics during their Long-Range Transportation Plan public involvement phase, all of which was well documented.
- The Huntsville Area MPO mentioned at least three ADA, elderly, and disability advocacy groups employed on their Vision Zero Task Force, as members of its MPO Policy Board, and as being very active and engaged during its MPO meetings.
- Trey Riley, City of Huntsville Attorney and supervisor of the TMA's ADA Coordinator is a member of the Huntsville Area MPO Policy Board.
- Huntsville Area MPO staff members recently attended PROWAG training, and they make use of accessible public buildings for its public involvement meetings, all of which was well documented.
- The MPO has updated demographic and age 65+ maps on its website that are frequently referenced during planning phases.

**Corrective Action:** None

#### **Recommendations:**

- The PPP should be updated by the end of FY 2026 (July 2026).



- The ADA Transition Plan should remove the reference in Appendix D to an inventory of barriers found in Appendix B since there is no inventory of barriers.
- The Huntsville Area MPO should document its internal controls to ensure nondiscrimination (e.g., document Title VI analyses of proposed plans; communicate findings of Title VI analyses in meetings and show transparency of results with the public).

**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** FHWA and FTA will provide technical assistance as requested.

## **4.9 Consultation and Coordination**

### **4.9.1 Regulatory Basis**

23 U.S.C. 134(g) and (i)(5)-(6), 49 U.S.C. 5303(g) and (i)(5)-(6), and 23 CFR 450.316(b-e) set forth requirements for consultation in developing the MTP and TIP. Consultation is also addressed specifically in connection with the MTP in 23 CFR 450.324(g)(1-2) and in 23 CFR 450.324(f)(10) related to environmental mitigation.

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

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



#### **4.9.2 Current Status**

The Federal Review Team could not locate any consultation procedures, contacts, or received feedback from Federal, State, or local resource agencies. ALDOT provided documentation and organized the process for environmental consultation with Federal, State, and local resource agencies as required by 23 CFR 450.324(g) for the MPOs regarding development of the MTP.

#### **4.9.3 Findings**

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** ALDOT, ADEM, and the MPO should cooperatively formalize, expand, and replicate the environmental consultation process that is available to the Huntsville Area MPO statewide.

**Schedule for Process Improvement:** By FY 2029 Certification Review.

**Proposed FHWA/FTA Technical Assistance:** FHWA and FTA can assist with enhancing the consultation process by providing contacts at other federal agencies or showing examples from other states, upon request.

### **4.10 List of Obligated Projects**

#### **4.10.1 Regulatory Basis**

23 U.S.C. 134(j)(7)(B), 49 U.S.C. 5303(j)(7)(B), and 23 CFR 450.334 requires that the State, the MPO, and public transportation operators cooperatively develop a listing of projects for which Federal funds under 23 U.S.C. or 49 U.S. C. Chapter 53 have been obligated in the previous year. The listing must include all federally funded projects authorized or revised to increase obligations in the preceding program year and, at a minimum, the following for each project:

- The amount of funds requested in the TIP.
- Federal funding obligated during the preceding year.
- Federal funding remaining and available for subsequent years.
- Sufficient description to identify the project.

- Identification of the agencies responsible for carrying out the project

#### **4.10.2 Current Status**

The current Annual Listing of Obligated Projects (ALOP) is compliant with the requirements of 23 CFR 450.334. The Huntsville Area MPO includes the document as part of the Transportation Improvement Program, which is a four-year document. The current version is a project list containing the required project data but no additional context. There is no explanation of the purpose of the document.

#### **4.10.3 Findings**

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** The ALOP should be a standalone document that is easy for the public to understand consistent with the provisions in 23 CFR 450.334, with ALDOT and MPO projects separated to show the public how the various projects are funded and being advanced toward implementation.

**Schedule for Process Improvement:** By FY 2029 Certification Review.

**Proposed FHWA/FTA Technical Assistance:** FHWA and FTA can provide an annual listing of obligated projects report examples from other organizations or training upon request.

### **4.11 Freight Planning**

#### **4.11.1 Regulatory Basis**

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

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



#### **4.11.2 Current Status**

The Huntsville Area MPO is compliant with the requirements of 23 CFR 450.306. The committee structure has freight representation, and the current *TRiP 2050* LRTP document evaluates freight system performance to include highways, ports, airports, etc. There is also a prioritized recommended project list.

#### **4.11.3 Findings**

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** None.

**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** N/A

## 4.12 Environmental Mitigation/Planning and Environment Linkages

### 4.12.1 Regulatory Basis

23 U.S.C. 134(i)(2)(D), 49 U.S.C. 5303(i)(2)(D), and 23 CFR 450.324(f)(10) requires environmental mitigation be set forth in connection with the MTP. The MTP is required to include a discussion of types of potential environmental mitigation activities for the transportation improvements and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the MTP.

### 4.12.2 Current Status

The MPO *TRiP 2045* MTP provided an overview of environmental/land use factors that must be considered to determine viability. The Huntsville Area MPO *TRiP 2050* MTP Chapter 4 discussed environmental mitigation but only in generic terms. Also, identified in *TRiP 2050* Chapter 4 were the potential impacts for individual projects. The Huntsville Area MPO *TRiP 2050* Chapter 4 mentioned possible types of mitigation for wetlands and historic properties. A table of environmental and land use factors considered for all fiscally constrained and visionary projects in the Huntsville Area MPO *TRiP 2050* LRTP can be found in Appendix B.

### 4.12.3 Findings

The Federal Review Team found it unclear why wetlands and historic properties mitigation resources were the only features addressed in *TRiP 2050*. Additionally, the Federal Review Team found no substantive discussion of either environmental impacts or possible mitigation regionally or within the entirety of *TRiP 2050*.

**Commendation:** None.

**Corrective Action:** For its next LRTP update, the Huntsville Area MPO must include a more robust discussion of potential environmental mitigation activities and potential areas for carrying-out those activities (focused on policies, programs, strategies, or at the project-level), consistent with 23 CFR 450.324(f)(10) and including: (1) identification of potential environmental mitigation activities; (2) consultation with applicable Federal, State, and Tribal land management, wildlife, and regulatory agencies to evaluate the value of **regional versus individual project mitigation**; (3) identification of whether/how various types of impacts can be mitigated off-site and/or regionally; and (4) identification and analysis of activities having the greatest potential to restore and maintain the region's environmental functions affected by the LRTP.



**Recommendations:** The Huntsville Area MPO should host an Environmental Roundtable that includes regional staff from member jurisdictions and partner organizations to examine projects through environmental lens; utilizing watershed management authorities, US Fish and Wildlife Services, Riverkeeper organizations, and possibly water/land preservations agencies like the Land Trust of North Alabama.

**Schedule for Process Improvement:** By FY 2029 Certification Review.

**Proposed FHWA/FTA Technical Assistance:** FHWA and FTA will provide technical assistance as requested.

## **4.13 Transportation Safety**

### **4.13.1 Regulatory Basis**

23 U.S.C. 134(h)(1)(B) and 49 U.S.C. 5303(h)(1)(B) requires MPOs to consider safety as one of 10 metropolitan transportation planning factors. As stated in 23 CFR 450.306(a)(2), the planning process needs to consider and implement projects, strategies, and services that will increase the safety of the transportation system for motorized and non-motorized users.

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

### **4.13.2 Current Status**

Huntsville Area MPO staff is the lead for the City of Huntsville Vision Zero Task Force. The task force meets bi-monthly and in person. A safety action plan is in place for the City of Huntsville, which in turn makes the City of Huntsville eligible for the Safe Streets for All (SS4A) grant program. With the task force and the plan in place, high injury networks have been easily identifiable and assist when prioritizing projects for those critical areas. The plan was not available online due to the sensitive crash data inside it.

The Huntsville Area MPO is substantially compliant with the requirements of 23 CFR 405.306. The planning process is consistent with the SHSP and other statewide documents, to include transit safety. The MPO supports all state safety targets and implements appropriate projects.



The MPO does not have a formal process to review all transportation projects for inclusion of appropriate safety countermeasures.

#### **4.13.3 Findings**

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** The MPO should have a review process with local partners to determine if any FHWA Proven Safety Countermeasures would be appropriate to be included for every project.

**Schedule for Process Improvement:** By FY 2029 Certification Review.

**Proposed FHWA/FTA Technical Assistance:** FHWA and FTA can provide training on project scoping and safety improvement identification, upon request.

### **4.14 Transportation Security Planning**

#### **4.14.1 Regulatory Basis**

23 U.S.C. 134(h)(1)(C) and 49 U.S.C. 5303(h)(1)(C) requires MPOs to consider security as one of ten planning factors. As further reflected in 23 CFR 450.306(a)(3), the metropolitan transportation planning process provides for consideration of security of the transportation system.

The regulations state that the degree and consideration of security should be based on the scale and complexity of many different local issues. For example, under 23 CFR 450.324(h), the MTP should include emergency relief and disaster preparedness plans and strategies and policies that support homeland security, as appropriate.

#### **4.14.2 Current Status**

The Huntsville Area MPO is compliant with the requirements of 23 CFR 450.306 in the metropolitan transportation plan. The Federal Review Team did not identify this item as a risk, and it was not covered at the virtual site review. The MPO coordinates with law enforcement and other security agencies, as appropriate.



#### **4.14.3 Findings**

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** None.

**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** N/A

### **4.15 Nonmotorized Planning/Livability**

#### **4.15.1 Regulatory Basis**

23 U.S.C. 217(g) states that bicyclists and pedestrians shall be given due consideration in the comprehensive transportation plans developed by each MPO under 23 U.S.C. 134 and 49 U.S.C. 5303. Bicycle transportation facilities and pedestrian walkways shall be considered, where appropriate, in conjunction with all new construction and reconstruction of transportation facilities.

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

#### **4.15.2 Current Status**

The Huntsville Area MPO created and published a bicycle and pedestrian plan named Huntsville MPO Bikeway Plan in 2022.

The Huntsville Area MPO has continued to increase involvement in nonmotorized transportation planning. The Huntsville MPO staff is the lead for the City of Huntsville Vision Zero Task Force. The task force meets bi-monthly and in person. A safety action plan is in place for the City of Huntsville, which in turn makes the City of Huntsville eligible for the Safe Streets for All (SS4A) grant program. With the task force and the plan in place, high injury networks



have been easily identifiable and assist when prioritizing projects for those critical areas. The plan was not available online due to the sensitive crash data inside it.

#### **4.15.3 Findings**

The Huntsville Area MPO meets all the nonmotorized requirements listed under 23 U.S.C. 217(g), 23 U.S.C. 134, and 49 U.S.C. 5303.

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** None.

**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** N/A

## **4.16 Integration of Land Use and Transportation**

### **4.16.1 Regulatory Basis**

23 U.S.C. 134(g)(3) and 49 U.S.C. 5303(g)(3) encourages MPOs to consult with officials responsible for other types of planning activities that are affected by transportation in the area (including State and local planned growth, economic development, environmental protection, airport operations, and freight movements) or to coordinate its planning process, to the maximum extent practicable, with such planning activities.

23 U.S.C. 134 (h)(1)(E), 49 U.S.C. 5303(h)(1)(E), and 23 CFR 450.306(a)(5) set forth requirements for the MPO Plan to protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns.

### **4.16.2 Current Status**

The Huntsville Area MPO is compliant with the requirements of 23 CFR 405.306. As a regional planning organization, the Huntsville Area MPO is uniquely suited to conduct land use analyses and impacts to the transportation network. The metropolitan transportation plan contains a





discussion of land use and transportation in Chapter 4. The Federal Review Team also reviewed a standalone document entitled *The Huntsville Development Review 2023*.

As this region continues to grow, it's more important than ever to plan proactively for future infrastructure needs. With more people moving in, business activity increasing, and land use evolving, our transportation system will face greater demands. Therefore, identifying right-of-way (ROW) needs early in the planning process is essential.

Incorporating a ROW planning framework into the MTP can:

- Stay ahead of potential bottlenecks,
- Align our transportation investments with changing community needs,
- Improve coordination with land use and utility partners, and
- Enhance our chances of securing state and federal funding by demonstrating strategic foresight.

#### **4.16.3 Findings**

The current *TRIP2050* LRTP does not include a dedicated section on long-range right-of-way (ROW) planning, which is a significant oversight.

Without early identification of potential ROW needs, the region misses critical opportunities to coordinate with local governments, utility providers, and environmental stakeholders. This lack of coordination could lead to project delays, increased costs, and a weakened position when competing for Federal or State funding.

Federal statutes and regulations 23 U.S.C. 134, 49 U.S.C. 5303, and 23 CFR Part 450, emphasize the importance of integrating land use and transportation planning—including ROW considerations—into the long-range planning process to ensure smoother, more efficient project development.

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** To support the continued growth and help ensure projects move forward without unnecessary delays, we recommend future LRTP updates include a right-of-way (ROW) planning framework that:

- Identifies potential ROW needs early in the planning process to reduce downstream impacts,
- Establishes a clear approach to coordinating with local agencies, utility providers, and environmental stakeholders, and

- Offers practical tools—like planning assumptions, map-based guidance, and early decision-making triggers—to help anticipate and manage ROW needs proactively.

This framework would enhance collaboration across agencies and reduce the risk of costly delays—especially important for a rapidly growing region like Huntsville.

**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** FHWA and FTA will provide technical assistance as requested.

## 4.17 Travel Demand Forecasting

### 4.17.1 Regulatory Basis

23 CFR 450.324(f)(1) requires that the Metropolitan Transportation Plan include the projected transportation demand of persons and goods in the Metropolitan Planning Area over the period of the transportation plan. Travel demand forecasting models are used in the planning process to identify deficiencies in future year transportation systems and evaluate the impacts of alternative transportation investments. In air quality non-attainment and maintenance areas, they are also used to estimate regional vehicle activity for use in mobile source emission models that support air quality conformity determinations.

### 4.17.2 Current Status

The metropolitan transportation plan is compliant with the requirements of 23 CFR 450.324. The plan contains a robust analysis of both current and future network demand, and this process informs the project selection process. There is substantial visualization of the travel demand modelling along with a discussion of how the model is developed and used.

### 4.17.3 Findings

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** None.



**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** N/A

## **4.18 Air Quality**

### **4.18.1 Regulatory Basis**

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

### **4.18.2 Current Status**

The MPO is compliant with the requirements of 23 CFR 450.324 and 23 CFR 450.326.

### **4.18.3 Findings**

**Commendation:** None.

**Corrective Action:** None.

**Recommendations:** None.

**Schedule for Process Improvement:** N/A

**Proposed FHWA/FTA Technical Assistance:** N/A



## 4.19 Congestion Management Process / Management and Operations

### 4.19.1 Regulatory Basis

23 U.S.C. 134(k)(3), 49 U.S.C. 5303(k)(3), and 23 CFR 450.322 set forth requirements for the congestion management process (CMP) in TMAs. The CMP is a systematic approach for managing congestion through a process that provides for a safe and effective integrated management and operation of the multimodal transportation system. TMAs designated as non-attainment for ozone must also provide an analysis of the need for additional capacity for a proposed improvement over travel demand reduction, and operational management strategies.

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

### 4.19.2 Current Status

The MPO and metropolitan transportation plan are compliant with 23 CFR 450.322 and 23 CFR 450.324.

- A. “2045” Edition of the CMP:** At the time of the Federal Review Team’s desk review, the then-current metropolitan transportation plan (*Transportation Regionally Innovative Projects for 2045 (TRiP 2045)*) contained a “Congestion Management Plan” component within Section 7 (Congestion Management, Safety, and Security), which was later amended on September 24, 2021, to include Congestion Management Plan changes based on the Regional Commuter Study). The “2045” edition of the CMP was a step-by-step process that included data collection, establishment of performance measures and system monitoring. Data collected for the CMP included traffic counts from the MPO’s transportation model, work zone data, and public transit service statistics. Performance measures established for the CMP included congestion-based measures, system efficiency-based measures, system accessibility-based measures, system mobility-based measures, and non-recurring measures. System monitoring for the CMP included the following steps: (1) Network Monitoring and Evaluation; (2) Corridor Ranking; (3) Corridor and Segment Strategy Screening; (4) Strategy Development; (5) Programming; (6) Strategy Implementation; and (7) Strategy Effectiveness Evaluations. Additionally, the Huntsville Area MPO used its CMP to identify the “Top 10” congested corridors and strategies for reducing congestion in those corridors.



**B. “2050” Edition of the CMP:** In the meantime, the Huntsville Area MPO was working on its next MTP update (*Transportation Regionally Innovative Projects for 2050 (TRiP 2050)*), and MPO staff indicated that the MPO Policy Board is expected to adopt the final product at its meeting on March 19, 2025. Over the past few years, MPO staff noted that the CMP effort has further evolved to focus on Redstone Arsenal (which now houses approximately 50,000 Federal Government employees, representing about 24 percent of the entire region’s workforce). MPO staff also commented that the region now encompasses a 24-County commuter shed spanning north Alabama and south Tennessee. In response to a Recommendation from the 2021 Huntsville TMA Certification Review, MPO staff noted that the CMP now includes more short-term interventions (e.g., various operational improvements), along with long-term interventions.

- The next iteration of the CMP is contained in the new *TRiP 2050* LRTP document, as reflected within Section 7 (Congestion Management, Safety, and Security) and supported by Appendix D (Congestion Management Process Procedures and Responsibilities Report), Appendix E (Congestion Management), and Appendix K (System Performance Report). The updated CMP actualizes operations objectives through a systematic approach for developing performance measures, identifying and analyzing problems, collecting data, developing strategies, implementing strategies, and further evaluating how the implemented strategies impact the transportation network. Additionally, Transportation System Management and Operations (TSMO) strategies are integrated into the LRTP through the CMP. As in the recent past, the Huntsville Area MPO’s CMP consists of ongoing data collection and analysis used to establish trends and to monitor the overall mobility of the transportation system through benchmarking techniques established in the Congestion Management Process Procedures and Responsibilities Report (Appendix D).
- The updated CMP is divided into following four sections: (1) State of the System; (2) CMP Technical Ranking; (3) Strategy Recommendations; and (4) Strategy Effectiveness Evaluations. Specific performance criteria and the parameters of study are reflected in the Congestion Management Process Procedures and Responsibilities Report (see Appendix D). The key system considerations are: (1) CMP Transportation Network (consisting of all major arterials, minor arterials, major collectors, and major rural collectors that were modeled in developing *TRiP 2050*) and (2) Local Public Transit Systems (including both fixed route and demand response public transit services). Development of the updated CMP was tied to a variety of objectives with correlating performance measures that included: (1) Congestion-Based Measures (V/C Ratio and Fixed Route Rate of Occupancy); (2)



System Efficiency-Based Measures (Daily VMT, VMT Per Person, and Roadways Operating at Congested Conditions); (3) System Mobility-Based Measures; (4) System Accessibility Measures; and (5) Non-Recurring Congestion Measures (Work Zone Data By Location).

- The updated CMP Procedures and Responsibilities Report (Appendix D) comprehensively lists each strategy to be considered within screening matrices to assist jurisdictions in selecting appropriate and feasible strategies to correct problematic corridors, with those strategy recommendations including (in order of consideration): (1) strategies that eliminate or reduce trips; (2) strategies that involve traffic operational improvements; (3) strategies that shift trips from single-occupancy vehicles to other multi-modal options; (4) strategies that involve intelligent transportation systems (ITS); and (5) strategies that add capacity for all vehicles. Each corridor selected for strategy recommendations underwent a comprehensive screening process, acknowledging that some non-traditional solutions may be effective in combating traffic congestion but recognizing that some of those recommendations will more than likely require additional study. Additionally, the CMP Procedures and Responsibilities Report establishes methods for prioritizing current and anticipated congested corridors, in which corridors within the defined CMP transportation network were prioritized based upon the following criteria: (1) Extent of Current Congestion; (2) Extent of Anticipated Congestion; (3) Functional Classification; (4) Current Traffic Volumes; (5) Safety; (6) Multi-Modal Network; and (7) Prior Funding Commitment.
- Additionally, the updated CMP discusses how the various highway and transit projects in *TRiP 2050* align with ALDOT's other associated plans and performance measures/targets (i.e., Strategic Highway Safety Plan (SHSP) and Highway Safety Improvement Program (HSIP) [PM1], Transportation Asset Management Plan (TAMP) [PM2], Alabama Long-Range Plan and Statewide Freight Plan [PM3], and Transit Asset Management (TAM)), consistent with the MPO's updated LRTP System Performance Report (Appendix K).

#### **4.19.3 Findings**

The Huntsville Area MPO completed the development of its updated Congestion Management Process/Plan as part of its updated *Transportation Regionally Innovative Projects for 2050 (TRiP 2050)* long-range transportation (LRTP) document that was adopted by the MPO Policy Board on March 19, 2025. The updated CMP satisfactorily addresses all applicable FHWA/FTA



statutory and regulatory requirements and reflects several enhancements in response to Recommendation from the previous TMA Certification Review conducted in 2021.

**Commendation:** In response to the Recommendation from the previous TMA Certification Review, the Huntsville Area MPO is commended for updating its Congestion Management Process/Plan as part of its new updated *Transportation Regionally Innovative Projects for 2050 (TRiP 2050)* long-range transportation (LRTP) document that was adopted by the MPO Policy Board on March 19, 2025. Notably, the updated CMP discusses how the various highway and transit projects in *TRiP 2050* align with ALDOT's other associated plans and performance measures/targets, consistent with the MPO's updated LRTP System Performance Report.

**Corrective Action:** None.

**Recommendations:** In the spirit of continuous process improvement, the Huntsville Area MPO is encouraged to continue exploring opportunities that further bolster the methods and analyses used in its Congestion Management Process/Plan when developing its next LRTP update.

**Schedule for Process Improvement:** The Huntsville Area MPO should implement the Recommendation before completion/adoption of the next LRTP update (no later than March 19, 2030).

**Proposed FHWA/FTA Technical Assistance:** FHWA and FTA are available to provide technical assistance, as requested.

## 5.0 CONCLUSION AND RECOMMENDATIONS

The FHWA and FTA review found that the metropolitan transportation planning process conducted in the Huntsville Area MPO meets with two (2) Corrective Actions of the federal planning requirements as follows.

### 5.1 Commendations

The following are noteworthy practices that the Huntsville Area MPO is doing well in the transportation planning process:

- The MPO Staff conducted an MPO 101 session for recently for a newly elected member of the MPO Policy Board.
- The Huntsville Area MPO is commended for the development of its new updated *Transportation Regionally Innovative Projects for 2050 (TRiP 2050)* long-range transportation (LRTP) document, which was adopted by the MPO Policy Board on March 19, 2025. Among the noteworthy components of *TRiP 2050* include: (1) an updated Congestion Management Process/Plan; (2) a robust System Performance Report; and (3) effective use of a variety of public involvement/participation/engagement/outreach techniques.
- The Review Team commends the MPO for posting MPO meeting dates and times on the website along with ‘archived’ quick links to Committee and Board resources that lead to past meeting minutes, agendas, and presentation materials. This makes it easier for members of the public to find out information that may aid in their ability and desire to participate in the MPO’s activities.
- The Huntsville TMA exemplified successful outreach efforts resulting in great public participation across most of its zip codes and across diverse demographics during their Long-Range Transportation Plan public involvement phase, all of which was well documented.
- The Huntsville TMA mentioned at least three ADA, elderly, and disability advocacy groups employed on their Vision Zero Task Force, as members of its MPO Policy Board, and as being very active and engaged during its MPO meetings.
- Trey Riley, City of Huntsville Attorney and supervisor of the TMA’s ADA Coordinator is a member of the Huntsville Area MPO Policy Board.
- Members of the Huntsville TMA recently attended PROWAG training, and they make use of accessible public buildings for its public involvement meetings, all of which was well documented.
- The Huntsville Area MPO has updated demographic and age 65+ maps on its website that are frequently referenced during planning phases.
- In response to the Recommendation from the previous TMA Certification Review, the Huntsville Area MPO is commended for updating its Congestion Management Process/Plan as part of its new updated *Transportation Regionally Innovative Projects for 2050 (TRiP 2050)* LRTP document that was adopted by the MPO Policy Board on March 19, 2025. Notably, the updated CMP



discusses how the various highway and transit projects in *TRiP 2050* align with ALDOT's other associated plans and performance measures/targets, consistent with the MPO's updated LRTP System Performance Report.

## 5.2 Corrective Actions

The following are corrective actions that the Huntsville Area MPO must take to comply with Federal Regulations:

- The UPWP must contain an Indirect Cost Allocation Plan (ICAP) and/or Certificate of Indirect Costs, if the MPO uses Federal funds for reimbursement of indirect costs. If the MPO does not request reimbursement for indirect costs, there must be a statement in the UPWP indicating that there are no Federal funds used for indirect costs.
- For its next LRTP update, the Huntsville Area MPO must include a more robust discussion of potential environmental mitigation activities and potential areas for carrying-out those activities (focused on policies, programs, strategies, or at the project-level), consistent with 23 CFR 450 324(f)(10) and including: (1) identification of potential environmental mitigation activities; (2) consultation with applicable Federal, State, and Tribal land management, wildlife, and regulatory agencies to evaluate the value of **regional versus individual project mitigation**; (3) identification of whether/how various types of impacts can be mitigated off-site and/or regionally; and (4) identification and analysis of activities having the greatest potential to restore and maintain the region's environmental functions affected by the LRTP

## 5.3 Recommendations

The Federal Review Team noted several recommendations from the 2025 review that are included in this report and strongly recommend high priority attention from the Huntsville Area MPO.

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

- UPWP
  - 1) According to 2 CFR 200.403 and 2 CFR 200.405, cost sharing approaches can be handled in two common ways:
    - a. **Direct Cost Allocation**  
50% of the cost is charged to MPO funds and 50% to another funding source (e.g., State/local funds or a separate Federal funding program).
    - b. **Indirect Cost Allocation**



If the software is part of an approved indirect cost pool, costs are distributed based on an indirect cost rate rather than being directly charged to MPO funds.

- 2) Although the UPWP document lists detailed transportation planning activities, the Huntsville Area MPO should include the Transit Asset Management Plan (TAM) and State of Good Repair Plan as specific planning activities in developing the UPWP.
- For its next LRTP update, the Huntsville Area MPO is encouraged to: (1) use and analyze additional geographic information system (GIS) layers focusing on other environmental factors (e.g., critical habitats); (2) examine (in collaboration with ALDOT) the approaches and methodologies used for developing “outer year” project cost estimates (beyond the TIP) to ensure all future fiscally-constrained project phases (e.g., right-of-way and utilities) are adequately addressed in those LRTP “outer year” cost estimates; (3) continue exploring opportunities that further bolster the methods and analyses used in its Congestion Management Process/Plan; and (4) assess the extent to which the streamlined approaches used in developing the updated **TRiP 2050** LRTP document were effective to ensure that large volumes of data/information are effectively conveyed while still appropriately addressing all applicable Federal requirements.
  - In meeting the Performance Measures and Targets outline in the TIP document, Huntsville Area MPO should have PTASP and TAM (transit) progress achieved in linking investment priorities to those performance targets. In keeping with the Huntsville Area MPO inflation rates discussion, the MPO should look at innovative funding to assist in project cost estimations.
  - The Federal Review Team recommends that the MPO consider the future update of the Public Participation Plan (PPP) to help promote continued public involvement beyond the required cyclical plan outreach, including the location-based efforts at public events and gatherings.
  - The PPP should be updated by the end of FY 2026 (July 2026).
  - The ADA Transition Plan should remove the reference in Appendix D to an inventory of barriers found in Appendix B since there is no inventory of barriers.
  - The Huntsville Area MPO should document its internal controls to ensure nondiscrimination (e.g., document Title VI analyses of proposed plans; communicate findings of Title VI analyses in meetings and show transparency of results with the public).
  - ALDOT, ADEM, and the MPO should cooperatively formalize, expand, and replicate the environmental consultation process that is available to the Huntsville Area MPO statewide.
  - The annual listing of Obligated projects (ALOP) should be a standalone document that is easy for the public to understand, consistent with the provisions in 23 CFR 450.334, with ALDOT and MPO projects separated to show the public how the various projects are funded and being advanced toward implementation.
  - The Huntsville Area MPO should host an Environmental Roundtable that includes regional staff from member jurisdictions and partner organizations to examine projects through environmental lens; utilizing watershed management authorities, US Fish and Wildlife Services,



Riverkeeper organizations, and possibly water/land preservations agencies like the Land Trust of North Alabama.

- The MPO should have a review process with local partners to determine if any FHWA Proven Safety Countermeasures would be appropriate to be included for every project.
- To support the continued growth and help ensure projects move forward without unnecessary delays, future LRTP updates should include a right-of-way (ROW) planning framework that:
  - Identifies potential ROW needs early in the planning process to reduce downstream impacts,
  - Establishes a clear approach to coordinating with local agencies, utility providers, and environmental stakeholders, and
  - Offers practical tools—like planning assumptions, map-based guidance, and early decision-making triggers—to help anticipate and manage ROW needs proactively.

This framework would enhance collaboration across agencies and reduce the risk of costly delays—especially important for a rapidly growing region like Huntsville.

- In the spirit of continuous process improvement, the Huntsville Area MPO is encouraged to continue exploring opportunities that further bolster the methods and analyses used in its Congestion Management Process/Plan when developing its next LRTP update.

## **5.4 Training/Technical Assistance**

FHWA and FTA will provide technical assistance as requested by the MPO.



## **APPENDIX A - PARTICIPANTS**

The following individuals were involved in the Huntsville urbanized area virtual review:

### **USDOT Review Team**

Shontrill M. Lowe, FHWA Alabama Division  
Larry Anderson, FHWA Headquarters Office of Planning  
Kadian Hollenquest, FHWA Alabama Division  
Christine Medina, FHWA Alabama Division  
Tim Heisler, FHWA Alabama Division  
Tammy Keely-Wright, FHWA Alabama Division  
Lynne Urquhart, FHWA Alabama Division  
Joseph Bass, FHWA Alabama Division  
Doug Hoffman, FHWA Alabama Division  
Brandon Oliver, FTA Region IV  
Nancy Pruitt, FTA Region IV

### **Huntsville MPO**

Dennis Madsen  
Kevin Bernard  
James Vandiver  
Jo Beth Gleason  
James Moore  
Ken Newberry

### **Department of Parking and Public Transportation, City of Huntsville**

John Autry

### **Alabama Department of Transportation (ALDOT)**

Bradley Lindsey  
Bryan Fair  
James Giles  
Robert Dees



### **MPO Board Members**

Tommy Battle, City of Huntsville Mayor

Mac McCutcheon, Madison County Commission (MPO Chairman)

### **Others**

John Ofenlock, City of Huntsville

Todd Slyman, City of Huntsville

Gary Whitley, CAC Member

Nia Lewis, General Public

Eddie Hoff, Town of Gurley

Rus McDonald, CAC Member

Larry Mason, CAC Member

Terry Jones, CAC Member

Houston Matthews, CROY Engineering

Marcus Reed, City of Huntsville

Aliyah Riley, City of Huntsville

## APPENDIX B - STATUS OF FINDINGS FROM LAST REVIEW

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

**Corrective Action 1:** The COOP and UPWP does not include health-related emergency events and maintain meeting minutes are not accessible on the website.

*Disposition: The Huntsville MPO will update the COOP and UPWP by December 2022, per 23 U.S.C. 134(d) and 23 CFR 450.314(a).*

**Corrective Action 2:** Per 23 U.S.C. 134(c), (h), and (i), and 23 CFR 45.324, the Long-Range Transportation Plan (LRTP) does not include a System Performance Report (23 CFR 450.324 (f)).

*Disposition: The Huntsville MPO LRTP will include a System Performance Report by December 2021, in accordance with Comprehensive Planning Activities for 2050 Plan.*

**Recommendation 1:** The Huntsville MPO could, to increase effectiveness of public involvement activities, diversity the contact list of the Public Participation Plan (PPP). Additionally, the MPO could implement new strategies for Virtual Public Involvement. This Recommendation could be implemented into the next update of the PPP.

*Disposition: Although the timeline is not specifically listed in the Federal guidelines, 23 CFR 450.316 states “the MPO shall develop and use a documented participation plan that defines a process for providing individuals ... and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process.”*

**Recommendation 2:** The Title VI Complaint Process should be made available on the Huntsville MPO website, as well as the establishment of a project prioritization schedule, by the next Transportation Management Area (TMA) Certification Review.

**Recommendation 3:** To enhance partnerships with the City of Huntsville and local law enforcement, with the goal to improve safety goals, the Huntsville MPO could utilize Regional Computer Study data with visual analysis of current trends. This Recommendation could be implemented by the next Transportation Management Area (TMA) Certification Review.

**Commendation 1:** The Regional Greenway Plan (Singing River Trail) and B.A.S.C. Citizen’s Group contribute to successful non-motorized planning in the area.



## **APPENDIX C – PUBLIC COMMENTS**

### **Policy Board Members –**

Our area uses the resources they have available to checkmark off priorities for the communities in which we serve.

The transit planners and MPO staff live it and do it on a regular basis and you can really see it in the details.

Teamwork is about getting the information out there because it is the center of it all.

There's always an ALDOT representative at the Policy Board meetings which is very beneficial to us Board members.

Permitting process or federal bureaucracy is where help is needed.

### **General Public –**

Very pleased with the MPO staff

Wish the MPO would do some futuristic type planning like MAGLift, finish the Birmingham to Memphis to Atlanta, add in future rails.

In planning, we wish the MPO would consider roundabouts more often, especially one direction in the morning and the other in the afternoon.

Hopeful for a HWY 431 tie in to the arsenal maybe through a I-566 type route.



## APPENDIX D - LIST OF ACRONYMS

**ADA:** Americans with Disabilities Act  
**AMPO:** Association of Metropolitan Planning Organizations  
**BIL/IIJA:** Bipartisan Infrastructure Law (BIL) / Infrastructure Investment and Jobs Act (IIJA)  
**CAA:** Clean Air Act  
**CFR:** Code of Federal Regulations  
**CMP:** Congestion Management Process  
**CO:** Carbon Monoxide  
**DOT:** Department of Transportation  
**FAST:** Fixing America's Surface Transportation Act  
**FHWA:** Federal Highway Administration  
**FTA:** Federal Transit Administration  
**FY:** Fiscal Year  
**HSIP:** Highway Safety Improvement Program  
**ITS:** Intelligent Transportation Systems  
**M&O:** Management and Operations  
**MAP-21:** Moving Ahead for Progress in the 21<sup>st</sup> Century  
**MPA:** Metropolitan Planning Area  
**MPO:** Metropolitan Planning Organization  
**MTP:** Metropolitan Transportation Plan  
**NAAQS:** National Ambient Air Quality Standards  
**NO<sub>2</sub>:** Nitrogen Dioxide  
**O<sub>3</sub>:** Ozone  
**PM<sub>10</sub> and PM<sub>2.5</sub>:** Particulate Matter  
**SHSP:** Strategic Highway Safety Plan  
**STIP:** State Transportation Improvement Program  
**TDM:** Travel Demand Management  
**TIP:** Transportation Improvement Program  
**TMA:** Transportation Management Area  
**U.S.C.:** United States Code  
**UPWP:** Unified Planning Work Program  
**USDOT:** United States Department of Transportation







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