The following describes the Northwest Louisiana Council Of Governments (NLCOG), the designated Metropolitan Planning Organization (MPO) for Northwest Louisiana, approach for responding to the new and revised SAFETEA-LU planning regulations. It is understood that no Transportation Plan or Transportation Improvement Program (TIP) amendments can receive federal approval until MPO plans comply with the SAFETEA-LU planning regulations.

Please note that the documentation and applicable planning provisions will vary by MPO (e.g. TMA status and non-attainment designation.)

The NLCOG has conducted a "review and reappraisal" or SAFETEA-LU "gap analysis" of both the planning processes and the current Long Range Transportation Plan (LRTP) which consists of the following:

1) Identification of new and/or revised planning regulations, incorporating SAFETEA-LU provisions, and
2) A description of the MPO response for meeting the SAFETEA-LU planning regulations; and
3) A brief summary that identifies further action anticipated by the MPO to continue the refinement and enhancement of the planning process.

This "SAFETEA-LU gap analysis" for the current Transportation Plan is conducted within the FY 2006-2007 Unified Planning Work Program (UPWP) resources. It is expected that additional work to refine the LRTP may continue in the FY 2008-2009 UPWP.
1) Metropolitan Transportation Plan Cycles

Objective: Metropolitan transportation plans shall be updated at least every four years in air quality non-attainment and maintenance areas, and at least every five years in attainment areas.

Response: The MPO (NLCOG) is currently classified as in “attainment” with the National Ambient Air Quality Standard (NAAQS) for the six principal pollutants termed "criteria" pollutants (as referenced by EPA at - http://www.epa.gov/air/criteria.html). Under SAFETEA-LU and designated as being in “attainment” for air quality, our Long Range Transportation Plan (LRTP) falls under a five year update cycle. NLCOG is in the process of updating, in-house, the current LRTP Caddo-Bossier Transportation Plan Update 2001-2025. The current LRTP was adopted by our MPO’s Transportation Policy Committee in June of 2004. Further, the LRTP update (Mapping the Way – Northwest Louisiana’s 2030 Long Range Transportation Plan) will address major SAFETEA-LU’s LRTP development process mandates which were not present, or explicitly stated, in the previous TEA-21 guidelines.

- Demonstrate a process for consultation with resource agencies on transportation projects that involve impacts to agricultural, natural, recreational, and cultural resources,
- Plans shall include “discussion” of potential environmental mitigation activities,
- Utilize a formal process and/or plan that solicits Public Participation,
- Adds representatives of bicycle/pedestrians and disabled persons to those groups that shall be provided opportunity to comment on the plan,
- MPOs must hold convenient / accessible public meetings, use visualization techniques, make information / plans readily available electronically,
- Consider safety and security of the transportation system as separate planning factors,
- Include “year of expense” dollar considerations for future transportation projects

During January of 2007, NLCOG initiated its LRTP update public participation effort. In order to solicit public comment concerning the region’s current condition/mobility options and future transportation needs, NLCOG has implemented a multifaceted participation approach. First, NLCOG developed a community opinion/feedback survey which has been distributed through the staff at high pedestrian traffic locations, and the survey is accessible online at: http://www.nwlainfo.com/Transport/LRTP2030/LRPUpdate_SurveyForm.asp
Another participation approach that will be implemented in the fall of 2008, is a request for public comment advertised through the primary regional print media outlets. It is anticipated that a draft LRTP document will be produced by November of 2007.
2) TIP Cycles and Scope

Objective: The TIP must be updated at least every four years and must contain at least four years of projects and strategies.

Response: On August 1st, 2007, NLCOG adopted, through the MPO’s Transportation Policy Committee, its SAFETEA-LU compliant Transportation Improvement Program (TIP) titled *Northwest Louisiana Metropolitan Planning Area - TIP 2007*. The adopted TIP identifies and defines all transportation improvement projects, within the MPO, that utilize federal source funding for fiscal years 2007 through 2010. Further, this particular TIP was produced utilizing the guidelines set out in the CFR Title 23; Chapter I; Sec. 450.324 *Development and content of the transportation improvement program (TIP)*. Northwest Louisiana’s (MPO) adopted TIP is accessible online at: [http://www.nwlainfo.com/](http://www.nwlainfo.com/)

3) Environmental Mitigation

Objective: Metropolitan and statewide transportation plans must include a discussion on types of potential environmental mitigation activities, to be developed in consultation with Federal, State and Tribal wildlife, land management, and regulatory agencies.

Response: In order to meet the objective of this revised provision, NLCOG follows a systematic program development and project delivery process for proposed transportation improvement projects developed through the Louisiana Department of Transportation and Development (LADOTD). The first two stages, termed Stage 0 (feasibility study) and Stage 1 (Planning/NEPA process), requires Federal, State and Tribal wildlife, land management, and regulatory agency participation prior to any environmental mitigation activities.

During a Stage 0 Study, the MPO, in coordination with the LADOTD, perform an initial feasibility/scoping study on newly proposed transportation improvement projects that utilize STP >200k, ITS, or Federal/State Earmarked source funding. The Stage 0 Study essentially provides a base of technically gathered data that defines the geometric, operational, safety, and environmental characteristics of the proposed project. Further, the study, through its Environmental Checklist Form, identifies possible significant environmental issues and/or components located within the project’s area of impact. LADOTD officials review the findings of the Stage 0 Study and request additional information from the MPO, or, deem the project not feasible based upon the analysis provided, or, progress the project to the next level in the LADOTD Program Development process (Stage 1 – Planning / Environmental).
If a proposed project is advanced to Stage 1, LADOTD initiates the appropriate environmental action that meets the requirements of NEPA. However, concerning projects that utilize Federal/State Earmark and STP >200k source funding, NLCOG (MPO) has been approved to, and is currently, letting contracts for services to perform the required environmental impact analysis (EAs and EISs). It is through the NEPA required impact analysis that Federal, State and Tribal wildlife, land management, and regulatory agencies are consulted to determine the appropriate environmental mitigation activities.

4) New Consultations
New or revised provision: 23 U.S.C. 134(i)/49 U.S.C. 5303(g),(i). and (j); 23 CFR 450.322

Objective: The MPO must consult "as appropriate" with "State and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation" in developing long-range transportation plans.

Response: “Coordinated Public Transit-Human Service Transportation Plans” required by SAFETEA-LU for the following programs: Elderly Individuals and Individuals with Disabilities (5310), Job Access and Reverse Commute (JARC), New Freedom and Rural Transit Programs (5311).

A Coordinated Public Transit-Human Services Transportation Plan identifies the transportation needs of individuals with disabilities, older adults, and individuals with limited incomes, lays out strategies for meeting these needs, and prioritizes services for funding and implementation. The focus of this plan has been to evaluate our existing coordination activities and to identify possible areas in which these coordination activities could be expanded. The existing coordination activities include our coordination plan for JARC service through the existing urban transit system.

During February of 2007, as many stakeholders as could be identified were invited to participate in the planning process with an intended outcome that they would agree to continue the process over the next year as we work together to build the foundation that will allow for the implementation of more coordination activities in the future.
5) Consistency of the Transportation Plan with Planned Growth and Development Plans


Objective: Revises the previous planning factor related to environment to add "promoting consistency between transportation improvements and State and local planned growth and economic development patterns."

Response: Through our Technical Advisory Committee (TAC: http://www.nwlainfo.com/office_info/nlcog/TAC_Comm.htm) process, various local government entities participate in the development of the MPO’s LRTP and TIP. In particular, Bossier City and the Bossier Parish Police Jury have updated and adopted the following land use and development plans: Bossier City’s Comprehensive Plan (2003) and Bossier Parish Transportation Plan (2004). Concerning transportation project development for Bossier Parish, the aforementioned implemented plans are critical to the formulation and proposal of improvement projects during the LRTP and TIP development processes.

6a) Transportation System Safety Component


Objective: SAFETEA-LU recognizes the consideration of the safety of the transportation system to be a stand-alone planning factor, signaling an increase in importance from prior legislation, in which security was coupled with safety in the same planning factor.

Response: The MPO currently facilitates a Traffic Incident Management Committee (TIMS). In 1999, the TIMS was formed to develop a multi-jurisdiction traffic management program that will provide for the organized and safe movement of traffic during major accidents/incidents. The committee itself consists of representatives from Police, Fire, EMS, E-911, Office of Emergency Preparedness/Homeland Security, LADOTD, local Departments of Traffic Engineering, private towing services, and Regional Transportation Planning located within Caddo, Bossier, Desoto, and Webster Parishes.

Regional safety issues are further addressed through the 2002 Northwest Louisiana Regional ITS Strategic Deployment Plan and NLCOG’s subsequent update in late 2007. One of the primary Objectives of the proposed ITS deployment is to improve the safety on the regional transportation system. The proposed deployment is generally consistent with the area’s current and proposed future Congestion Management System (CMS) corridors and is intended to address transportation system deficiencies within the region. The deployment is grouped into timeframes (Immediate, Near, Mid, and Long-Term) and phases to reflect the stakeholders’ implementation priorities with consideration of potential funding constraints (i.e. the deployment is fiscally constrained).
6b) Transportation System Security - Security Only Component


Objective: SAFETEA-LU recognizes the consideration of the security of the transportation system to be a stand-alone planning factor, signaling an increase in importance from prior legislation, in which security was coupled with safety in the same planning factor.

Response: NLCOG consults and coordinates transportation security issues through the aforementioned TIMS Committee. Specifically, local/parish/state law enforcement agencies, as well as, the Caddo/Bossier Office of Emergency Preparedness and Homeland Security actively participate in the TIMS Committee and affect the outcomes of NLCOG’s planning processes.

7) Operational and Management Strategies


Objective: Metropolitan transportation plans shall include operational and management strategies to improve the performance of the existing transportation facilities to relieve vehicular congestion and maximize the safety and mobility of people and goods.

Response: Regional operational and management issues are further addressed through the 2002 Northwest Louisiana Regional ITS Strategic Deployment Plan. In the fall of 2007, NLCOG will update the 2002 Plan to reflect the deployment of ITS instrumentation and other technologies since 2002, as well as, renew the systems architecture report.

From the 2002 Plan, the ITS strategies to be deployed include:

- Advanced Surface Street Control with regional traffic control (including upgrade of all traffic signal systems within the City of Shreveport and integration of the Bossier City system).
- Advanced Freeway and Incident Management Systems including network surveillance.
- Advanced Traveler Information Dissemination Systems.
- Advanced Public Transportation Systems.

The Immediate/Near/Mid-Term fiscally-constrained deployment program includes the upgrade and integration of all traffic signals within the Cities of Shreveport and Bossier City and includes deployment along the critical segments of I-20, I-220 and I-49 within the region.
8) Participation Plan

Objective: SAFETEA-LU requires all MPOs to develop a Public Participation Plan in consultation with all interested parties. The MPO must develop and utilize a "Participation Plan" that provides reasonable opportunities for interested parties to comment on the content of the MTP and TIP. Further, this "Participation Plan" must be developed "in consultation with all interested parties." This consultation requirement is intended to afford parties who participate in the metropolitan planning process a specific opportunity to comment on the plan prior to its approval.

Response: NLCOG will formally adopt their Public Involvement Plan (PIP) early 2008. NLCOG’s PIP is intended to ensure that public participation is an integral and effective part of the activities and decisions that are made with the benefit and consideration of important public perspectives. Early public involvement enables NLCOG to make more informed recommendations, improve quality through collaborative efforts, and build mutual understanding and trust. NLCOG is committed to a comprehensive and inclusive approach by involving the public in developing plans and programs that fit harmoniously within the community without sacrificing quality of life. The Draft PIP will be available for public review through NLCOG’s online presence at http://www.nwlainfo.com or in hardcopy form through the Parish library systems.

9) Visualization Techniques in Plans and Metropolitan TIP Development

Objective: As part of the MTP and TIP development, the MPO shall employ visualization techniques. Visualization techniques facilitate increased public participation and understanding through their clear and easily accessible formats such as maps, pictures, and/or displays.

Response: Maps and aerial photography for the LRTP and TIP development process were provided through NLCOG’s Regional Geographic Information System (REGIS – more information can be found at: http://www.nwlainfo.com/regis/gis_default.htm).

10) Publication of Plans and TIP

Objective: The MPO shall publish or otherwise make available for public review transportation plans and TIP "including (to the maximum extent practicable) in electronically-accessible formats and means, such as the World Wide Web."
Responses: Our primary means of hardcopy publication for public review/comment is to distribute hardcopies of our UPWP, LRTP, and TIP documents to the public library system in both Caddo and Bossier Parishes. Online access to these publications is made available through NLCOG’s web presence at [http://www.nwlainfo.com](http://www.nwlainfo.com).

### 11) Annual Listing of Obligated Projects

**Objective:** SAFETEA-LU specifies that the development of the annual listing "shall be a cooperative effort of the State, transit operator, and MPO" and also shall include two new project types, "investments in pedestrian walkways and bicycle transportation facilities" for which Federal funds have been obligated in the preceding year.

**Response:** The MPO is in consultation with LADOTD’s bicycle/pedestrian walkways coordinator. Currently, the MPO does not have an adopted region-wide bicycle/pedestrian facilities plan. The MPO relies on the statewide bicycle/pedestrian plan for the development of these types of projects in the Long Range Transportation Plan.

### 12) Congestion Management Process (CMP) in Transportation Management Area (TMA)
**Revised provision:** Amended 23 U.S.C. 134(k) and 49 U.S.C. 5303(k); 23 CFR 450.320

**Objective:** Within a metropolitan planning area serving a TMA, there must be "a process that provides for effective management and operation" to address congestion management. This provision is similar to previous requirements for a Congestion Management System (CMS) to be developed and implemented in the TMA with minor adjustments made to previous language. Essentially, the Congestion Management Process planning provision aims to place more of an emphasis on management and operations to address congestion management before considering capacity expansion. The intent of this planning provision is to make the CMP more meaningful by fostering a better linkage to the planning process. For example, the CMP presents opportunities for addressing recurring and nonrecurring congestion in the transportation planning process and to advance congestion management initiatives for programming and implementation.

**Response:** Currently, NLCOG’s has been addressing the CMS through data collection and analysis, through compilation of CMS/CMP information from implementing agencies associated with projects submitted to the Long Range Transportation Plan (LRTP) and Transportation Improvement Program (TIP), and through consideration of management and operations strategies under the Northwest Louisiana Regional ITS Strategic Deployment Plan.

NLCOG (MPO) will develop an enhanced Congestion Management Process (CMP) to coincide and be a part of the revised LRTP, and help ensure that the new LRTP is SAFETEA-LU compliant. NLCOG will utilize existing information sources and reports.
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such as current travel time data logged along defined CMP study corridors, archived travel time data, in-house traffic count datasets, and the Regional GIS/Travel Demand Model (TDM) to provide a base of information used to determine the location and extent of travel delay. This information will be better integrated at a number of points in the LRTP. NLCOG doesn’t anticipate the use of new or different performance measures than those already reported in the source materials, nor to involve new data collection activities. Current information sources are robust and are anticipated to be satisfactory to ensure SAFETEA-LU compliance. The process will consider how best to address the initial CMP, whether as portions of the LRTP document or as a stand-alone document. Support for this action is found within the FY2008 Unified Planning Work Program (UPWP) tasks.

The FY2008 UPWP includes a new, separate CMP task with dedicated funding. This will enable an expanded set of CMP tasks. Task under consideration are mapping enhancements, new data collection, new performance measures, new Web interactive features, and how frequently to update the CMP.

It is proposed that the Technical Advisory Committee (TAC) will serve as an oversight committee for the CMP. The TAC, as it was configured under the initial CMS, is in the best position to address the breadth of topics and activities that must be included in a CMP.

13) TMA Certification Cycle

Objective: FHWA/FTA must certify each TMA planning process at least every four years (as opposed to the prior legal/statutory requirement of every three years).

Response: No response necessary. This was included as a reminder…

14) Coordinated Public Transit-Human Services Transportation Plan (Sections 3012, 3018, and 3019)
http://www.fta.dot.gov/laws/leg_reg_circulars_guidance.html Circulators are listed by the three programs.

Objective: As a condition for receiving formula funding under certain FTA programs, proposed projects must be derived from a locally developed public transit human services transportation plan. The plan must have been developed through a process that included representatives of public, private, and non profit transportation and human services providers, as well as the public.
Response: Please refer to NLCOG’s response in the “4) New Consultations” section regarding the development of the regional Coordinated Public Transit-Human Services Transportation Plan.

15) Cost Constraints
New or revised provision: 23 U.S.C. 134(i) and (j) / 49 U.S.C. 5303(i) and (j) 23 CFR Parts 450.322 and 450.324

Objective: Review and reaffirm fiscal constraint of transportation plans and programs as they are updated or amended.

Response: Through both the LRTP and TIP development processes, MPO staff performs a thorough assessment of anticipated funding streams and estimated improvement project costs to determine each respective programs level of financial constraint.

As of December 11th, 2007, SAFETEA-LU mandates that the TIP calculate improvement cost estimates using an inflation rate(s) to reflect “year of expenditure dollars,” based on reasonable financial principles and information, developed cooperatively by the MPO, State, and public transportation. Future TIP updates, will employ an inflationary rate to better calculate programmed improvement project costs.

16) Safe Routes to School
New provision: Public Law 109-59, Section 1404.

Objective: Inclusion of a new program required under SAFETEA-LU section 1404, the Safe Routes to School program provides Federal-aid highway funds by formula to DOT over five Federal fiscal years (FY 2005-2009) for infrastructure and non-infrastructure projects and to administer SRTS programs that benefit a specified vicinity around elementary and middle schools (grades K-8).

Response: MPOs need to be aware of this program and take it into consideration. LADOTD has a Safe Routes to School Coordinator in their Planning section. In addition to the SRTS Coordinator at the state level, NLCOG (MPO), through the work of our staff public involvement/Title VI Officer, assembled a SRTS Program information packet that was distributed (August 13, 2007) to all the public school principals within the MPO area. Further, one school (Meadowview Elementary, Bossier City) has been awarded ($250,000) SRTS funding for their school’s safety program and neighborhood infrastructure improvements.