
7. SAFETEA-LU NARRATIVE

EIGHT PLANNING FACTORS

The *SAFETEA-LU* legislation (P.L. 109-59, Section 6001(h)) specifies eight factors to be considered in the transportation planning process. These factors must be explicitly reflected in the planning process products, including the Long-Range Transportation Plan. The *ITCTC* has made a good faith effort to consider and address these factors throughout the 2030 LRTP. A brief review of the success of these efforts follows.

1. Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency;

Response: The *ITCTC* participated in the process of generating an economic development plan for the county. The *ITCTC* continues to be an active member of the Tompkins County Area Development agency Economic Development Strategy Coordinating Committee. The *ITCTC* will continue to coordinate its transportation planning efforts with economic development agencies whose mission is strengthening the economic vitality of Tompkins County.

2. Increase the safety of the transportation system for motorized and non-motorized users;

Response: The *ITCTC* recognizes the importance of safety in the transportation system. As such, the agency has supported efforts in pedestrian and bicycle planning, intersection improvement programs and transportation enhancement projects that provide a safer environment for non-motorized users. Since its first LRTP the *ITCTC* has identified safety as one of the overarching concerns that pervade all goals, objectives and strategies in the Long-Range Transportation Plan. In addition, in cooperation with NYSDOT, the *ITCTC* has programmed a substantial number of bridge rehabilitation/replacement projects and railroad crossing safety improvement projects. The *ITCTC* will continue to prioritize safety in its transportation planning and project funding efforts.

The *ITCTC* has identified the creation of a coordinated traffic accident reporting system as a priority project. Accurate accident reporting data will be invaluable in order to address transportation safety planning and law enforcement concerns. Recently NYSDOT implemented the Accident Location Information System (ALIS). The *ITCTC* will use this information in its future transportation planning efforts.

3. Increase the security of the transportation system for motorized and non-motorized users;

Response: In several of its planning projects for implementation, the *ITCTC* has committed to addressing the transportation-related security concerns and needs of Tompkins County. The area's topography and climate present unique security challenges in preventing and mitigating potential natural and man-made threats. Cooperation with and among state and local participants is essential to implement effective response strategies.

NYSDOT implements a bridge inspection program that includes all bridges. Bridge condition ratings are assigned in a scale from 1 to 7, where 1 is a failing structure and 7 is excellent. This analysis is used by state and local engineers to develop their maintenance plans for bridges. The *ITCTC* works closely with its local partners to ensure these critical infrastructure assets are funded to maintain their state of good repair. More information is included in *Ch.4 Connectivity* section.

Tompkins County has a robust program structure to address emergency management and disaster response. These activities are guided by the *Tompkins County's Comprehensive Emergency Management Plan* and the *Tompkins County Multi-Jurisdictional All-Hazards Mitigation Plan*. More information is included in *Ch.4 Safety Element* section.

The *ITCTC* recognizes the key role of law enforcement resources in improving transportation security. The *ITCTC* will continue to work with its partners to improve enforcement efficiency by identifying priorities and exploring developing options, such as remote enforcement. Further, the *ITCTC* supports TCAT actions to improve the security of transit infrastructure through capital and operational improvements.

4. Increase the accessibility and mobility options available to people and for freight;

Response: The 2030 LRTP strongly supports the provision enhanced mobility options for residents, visitors and freight haulers in Tompkins County. The plan's goals and objectives embrace the concept of Sustainable Accessibility. This broad concept seeks to transform transportation systems into mobility networks that are responsive to pedestrians, bicyclist, transit, rail, freight, and motorists while meeting the vehicular congestion, energy and environmental concerns that are now an impending crisis. Sustainable Accessibility can be defined as the ability to get to a destination or complete a task in an efficient, convenient, and reliable way, while using technologies and services that minimize environmental impacts,

promote economic vitality and ensure equity in the provision of transportation to the community.

The *ITCTC* was supportive of the consolidation of transit services in Tompkins County, which resulted in improvements in overall public transportation service. The *ITCTC* continues to work closely with TCAT in a cooperative manner to promote enhanced public transportation in Tompkins County. The *ITCTC* also cooperates with Gadabout, the only paratransit service available in Tompkins County, to ensure continued effective implementation of their critical transportation service. The *ITCTC* will work with TCAT to advance the goals and objectives of the LRTP with the final goal of providing the best possible transit service to residents of Tompkins County

The *ITCTC* recognizes the importance of the impacts of land use decisions on the transportation system. As such it works closely with local governments in efforts to promote decisions that will enhance intermodal connectivity, transit operations, and the livability of communities in the planning area.

5. *Protect and enhance the environment, promote energy conservation, and improve quality of life;*

Response: Since the initial LRTP in 1994 the *ITCTC* has expressed specific concern over the apparent lack of balance in the local planning realm with regard to the relationships between transportation and development, land use, economic, and environmental impacts. The *ITCTC* has recommended that the county and local governments complete planning efforts as comprehensive land use plans, economic development plans, and local thoroughfare plans. The existence of these documents is important to the regional transportation planning efforts of the MPO.

The role of the *ITCTC* has been to, first, encourage intergovernmental cooperation on specific development and transportation issues; second, to offer technical advice to help resolve transportation/development conflicts, and third, to work towards more coordinated transportation planning between local governments and the MPO intended to enhance the linkages between transportation and development.

The *ITCTC* worked closely with Tompkins County in development of the Tompkins County Comprehensive Plan. The principal objective of that cooperative effort was to ensure the Comprehensive Plan and the LRTP were mutually supportive. The land use components in the Scenario Analysis in Chapter 5 was derive from the county's Comprehensive Plan's. Similarly, the energy consumption and greenhouse gas emission goals in Chapter 5 are those generated during development of the Energy and Greenhouse Gas Element of the Comprehensive Plan.

The *ITCTC* is continuously refining its travel demand model, which can be an important tool to assist local governments in predicting the transportation impacts of both transportation and land use development decisions.

For the first time the 2030 LRTP includes an Climate Change and Energy Position Statement that is meant to clarify the *ITCTC*'s policy with regards to transportation and its relationships to greenhouse gas emissions and energy consumption. The Position Statement as well as the Energy and Greenhouse Gas Element of the County Comprehensive Plan identify the strong dependence on private automobile travel as a key factor in the transportation sector's energy consumption and greenhouse gas emissions balance. The 2030 LRTP strongly encourages the reduction of vehicle miles of travel (VMT) as a necessary step towards meeting energy consumption and green house gas emissions goals for future years. The plan recognizes that some of the principal incentives to spur a modal shift will originate at the national and state level (i.e. gasoline prices), but that other strategies can be initiated locally. A variety of strategies are included in the plan to help promote the required modal shift away from private cars. They include land use planning to reduce trip distance, ensuring the provision of access and facilities for other modes (transit, bicycle, pedestrian, car share, van pools, ridesharing), facilitating access to transportation information, etc. There are multiple environmental and economic benefits from reducing car dependency that will advance the purpose of this planning factor: enhance the environment, promote energy conservation, and improve quality of life.

6. *Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;*

Response: A number of local initiatives and projects are in place that assist Tompkins County in achieving greater integration between modes. All the Tompkins Consolidated Area Transit (TCAT) buses are equipped with bicycle racks. It is the policy of TCAT, the county's public transportation agency, to continue to provide bicycle racks in all their routes. In addition, TCAT is aggressively pursuing ADA compliance for its facilities and multiple other projects aimed at improving the efficiency of transit service. Tompkins County was a participant in the New York State Canal System Recreationway Study. The *ITCTC* completed a Transportation Trail/Corridor Study for Tompkins County and together with the Tompkins County Planning Department offers trail development technical assistance. The City of Ithaca has adopted a Bicycle Plan, a downtown design plan, and plans for Inlet Island, the West End and Southwest Park. Currently the City of Ithaca is in the early stages of developing a City Comprehensive Plan. The *ITCTC* will play an active role in that effort. Various other communities continue to work on local planning initiatives

that contain projects that will be eligible for Transportation Enhancement Program funding. All of these local planning efforts will assist the MPO in the identification and prioritization of enhancement projects and help supplement this plan.

The *ITCTC* completed a Freight Transportation Study in April 2002. The data from that study was integrated into the development of the 2030 LRTP. The *ITCTC* will work on implementation of the recommendations included in the Freight Transportation Study, which focused on improving the safety and efficiency of freight transportation in Tompkins County while minimizing the negative impacts to residents.

Currently, the Ithaca-Tompkins County Airport is served by public transit (TCAT) and by private transportation providers (i.e. taxi and limousine services). The airport access road (Brown Road) provides effective vehicular access to the facility.

Integration is one of the central components of the Sustainable Accessibility concept espoused by the 2030 LRTP goals and objectives in Chapter 3. The definition for transportation integration is conceptually based on the premise of increasing coordination between modes in order to achieve greater operational efficiencies and to increase the convenience to users. Coordination between modes extends to all aspects of and works best when it is customer based and centered on providing ease of access, comfort, reliability and convenience. Integration in the 2030 LRTP brings together components of connectivity (networks) and mobility (travel modes and freight) in a dynamic format that seeks to improve efficiency and convenience for users.

7. *Promote efficient system management and operation;*

Response: The 2030 LRTP recognizes the importance of transportation system management (TSM) and operations initiatives in securing the integrity of the transportation system in Tompkins County. TSM strategies can also help expand the effective service life of valuable transportation infrastructure assets. Specific goals and objectives and recommendations for projects for implementation seek to improve efficiency through TSM options. Specifically, the plan identifies support for the City of Ithaca’s traffic signal upgrade program..

8. *Emphasize the preservation of the existing transportation system;*

Response: The transportation programming processes of the New York State Department of Transportation and the Ithaca-Tompkins County Transportation Council place special emphasis on maintaining the operational capability and safety of existing roads, bridges, and transit operations.

Projects currently programmed in the Transportation Improvement Program demonstrate this commitment. The Financial section on Ch. 4 also shows the substantial investment planned for preservation of existing facilities.

The *ITCTC* has consistently included as one of the primary principles in the LRTP the improvement of performance of the existing transportation system through TSM and transportation demand management (TDM) efforts. *ITCTC* staff has worked with the member agencies, particularly the City of Ithaca and Cornell University, to study and implement appropriate TDM strategies.

The *ITCTC* has also coordinated with TCAT to plan and program a variety of projects that will enhance public transportation service and should help to increase use of transit. Examples of these projects include: enhanced passenger information systems, enhanced fare collection system, improvements to and additional bus shelters, improved bicycle/pedestrian access to bus routes. More recently, the *ITCTC* has cooperated with TCAT towards implementation of a vanpool program for Tompkins County.

Tompkins County has a substantial network of abandoned railroad corridors. The *ITCTC* is actively involved in advancing development of these right-of-ways into multi-use trails in conjunction with municipal partners countywide. Developing these trails efficiently preserves the corridors as transportation facilities. Multiuse trails encourage and facilitate safe and efficient non-motorized transportation, and thus provide a much-needed alternative to the automobile.

Although no single alternative mode will ever meet all the transportation needs currently met by automobiles they - transit, bicycling, walking, car sharing, ridesharing, vanpooling - in combination with efficient land use development, can provide a viable option for many automobile based trips. Thus reducing congestion, enhancing the effectiveness of the existing transportation system overall, reducing maintenance costs and eliminating the need to expend resources to increase roadway capacity.

TEN PLAN REQUIREMENTS

The federal metropolitan planning rule (§450.322, page 7275) specifies ten planning requirements to be included in the metropolitan transportation plan. The *ITCTC* has made a good faith effort to consider and address these requirements throughout the 2030 LRTP. A brief review of this effort follows.

1. Identify the projected transportation demand of persons and goods in the metropolitan planning area over the period of the transportation plan;

Response: The current plan assumes that the transportation demands of persons and goods will remain relatively stable and a function of any growth in population. While this is a simplistic view, it does consider the following: (a) The population trends in the area are relatively stable growing at a rate of .7% per year between 2000 and 2007; and (b) the *ITCTC* recognizes the importance of modifying individual travel behavior as a means of avoiding the undesired environmental and societal impacts of an expanding highway system and continued automobile dependency within the transportation sector.

The *ITCTC's* travel demand model serves as an important tool to identify projected demands on the transportation system. This plan includes results from model runs in the analysis of alternative development scenarios derived from the Tompkins County Comprehensive Plan (Chapter 5).

The Tompkins County Freight Transportation Study completed in April 2002 described the freight movement patterns in the county. These are expected to remain relatively unchanged. There are currently no major proposals that would affect freight movement in the county. The low rate of population growth will also help moderate demand for freight services.

The *ITCTC* recognizes that any number of activities (i.e. new retail centers, manufacturing facilities, etc.) could induce increased demand for freight transportation. The *ITCTC* will monitor economic and land use activities to identify such changes and address them through the planning process.

In addition, the *ITCTC* continuously seeks the input and participation of affected and interested parties. Individuals who represent organizations such as neighborhood councils, advisory committees, and planning boards are regular participants in the activities and deliberations of the MPO.

The *ITCTC* and its staff maintain close working relationships with other planning professionals, both public and private, working in Tompkins County. While this contact may be "informal" (through such organizations as the American Planning Association or through "brown bag" meetings), the result is the exchange of information, ideas, and viewpoints on transportation and development that keep *ITCTC* staff informed on issues that may affect demand for transportation services and facilities.

2. Identify existing and proposed transportation facilities (including major roadways, transit, multimodal and intermodal facilities, pedestrian walkways and bicycle facilities, and intermodal connectors) that should

function as an integrated transportation system, giving emphasis to those facilities that serve important national and regional transportation functions over the period of the transportation plan. In addition, the locally preferred alternative selected from an Alternatives Analysis under the FTA's Capital Investment Grant program (49 U.S.C. 5309 and 49 CFR part 611) needs to be adopted as part of the metropolitan transportation plan as a condition for funding under 49 U.S.C. 5309;

Response: The **Transportation System** chapter of the L RTP includes a detailed inventory of existing and proposed transportation facilities. The plan identifies the region's existing network of infrastructure supporting both motorized and non-motorized transport. A presentation of multimodal and intermodal facilities is included. In addition to detailing the highway and transit system, the plan includes a sidewalk inventory and discussion of bicycle and pedestrian programs.

The *ITCTC* and partnering municipalities are promoting development of a countywide multiuse trail system. This system will provide a significant off road network of trails connecting many of the key trip generators in the county, thus providing a bicycling and walking transportation infrastructure that currently does not exist. There is strong potential for bicycling to become an important mode of transportation in Tompkins County. The *ITCTC* seeks to promote this through the construction of bicycle friendly facilities and seeking explicit consideration of bicycle and pedestrian issues in the implementation of transportation and land use development projects.

The *ITCTC* is committed to working with its partners to maintain the functionality of existing key infrastructure. Route 13, the only National Highway System route in Tompkins County, continues to be a significant and heavily-used artery. The route is also the area's primary link to the Interstate System. The *ITCTC* worked with local partners to implement a corridor management study for Route 13 in the northeastern part of the County. The agency will continue to be an active participants in efforts to implement the recommendations of the study.

3. Identify operational and management strategies to improve the performance of existing transportation facilities to relieve vehicular congestion and maximize safety and mobility of people and goods;

Response: There are a number of existing and future initiatives that serve to mitigate congestion locally. Partner agencies play a key role in implementing congestion management strategies. Cornell University, the largest employer in Tompkins County has an exemplary program for its faculty and staff, which promotes the use of carpools, and public transportation use for the commute to the

university. TCAT has been very aggressive in improving its scheduling, pricing and management structure to improve service. As a result, TCAT leads its upstate NY counterpart agencies in most measures of ridership and operational efficiency.

Census data shows that pedestrians are already an important component of the Journey-to-Work trips in Tompkins County. The *ITCTC* seeks to strengthen the role of pedestrians by encouraging the construction of pedestrian facilities, including improvement in pedestrian safety features.

ITCTC staff worked in close consultation with the Tompkins County Planning Department staff to coordinate data gathering and analysis with the new Tompkins County Comprehensive Plan. The goals and objectives of the LRTP support those of the Comprehensive Plan and vice-versa. The LRTP was incorporated by reference to the Tompkins County Comprehensive Plan to address transportation issues in the County. The *ITCTC* will continue to work with the Tompkins County Planning Department in an effort to better coordinate transportation and land use planning.

The *ITCTC* is working with its partners to continue implementation of the *Coordinated Public Transit-Human Services Transportation Plan for Tompkins County*. The coordinated plan assesses the services currently available to those with limited mobility (disabled persons, the elderly, etc.) and identifies the transportation needs of these vulnerable populations. The plan focuses on policy priorities and strategies to improve the operation and management of existing and future services.

The Scenario Analysis chapter highlights the need to promote a modal shift away from drive-alone transportation. Increased use of transit, support of walking and bicycling modes, as well as implementation of ridesharing, vanpooling, paratransit, car sharing, and TDM programs will be critical cost effective components of the future transportation system in Tompkins County. These programs exist at different stages of implementation.

Ithaca Carshare has offered car sharing services since June 2008. The *ITCTC* will continue to support this innovative program. The *ITCTC* is working with Cornell University, Ithaca College, Tompkins Cortland Community College, Tompkins County, and Cornell Cooperative Extension to implement a county wide ridesharing program. This should go operational sometime in 2010. Similarly a vanpool program managed by TCAT is nearing its implementation stage. The *ITCTC* is also working with Cornell Cooperative Extension and Tompkins County in the implementation of a traveler information program called Way2Go. This will provide individually tailored travel information services via a strong community outreach effort, and a robust web interface. Eventually, Way2Go may perform many of the functions of a countywide TDM program.

Other projects listed the Projects for Implementation section of the plan will have the direct or indirect result of alleviating congestion and improving traveler safety. The reader is directed to that section of the plan, which provides descriptions of specific recommended strategies.

- 4. Reflect the consideration of the congestion management process in TMAs that meet the requirements of this subpart, including the identification of SOV projects that result from a congestion management process in TMAs that are nonattainment for ozone or carbon monoxide;*

Response: The Management Systems are not fully developed. The *ITCTC* urbanized area is not a TMA. TMA requirements are not applicable to this area.

- 5. Assess capital investment and other strategies to preserve the existing and projected future metropolitan transportation infrastructure and provide for multimodal capacity increases based on regional priorities and needs. The metropolitan transportation plan may consider projects and strategies that address areas or corridors where current or projected congestion threatens the efficient functioning of key elements of the metropolitan area's transportation system;*

Response: The *ITCTC*, with the assistance of NYSDOT, Tompkins County, and other transportation partners, will continue to refine its assessments of these issues. The current process, as discussed in the **Financial** section in the **Transportation System** chapter, relies on generalized cost and revenue estimates.

The *ITCTC* is working to develop plans and strategies to address and mitigate congestion on important routes as the region experiences population and economic growth. For example, significant development is expected to continue North of the City of Ithaca in the area served by Route 96, near Cayuga Medical Center. The *ITCTC* worked with its partners to implement a corridor management study for Route 96. There is an ongoing dialogue between affected parties to address future development activities in the area. The corridor study data and recommendations are important contributions to this dialogue.

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6. *Include design concept and design scope descriptions of all existing and proposed transportation facilities in sufficient detail, regardless of funding source, in nonattainment and maintenance areas for conformity determinations under the EPA's transportation conformity rule (40 CFR part 93). In all areas (regardless of air quality designation), all proposed improvements shall be described in sufficient detail to develop cost estimates;*

Response: The Ithaca Urbanized Area and Tompkins County are in attainment with regards to air quality conformity regulations. Nonattainment/maintenance requirements are not applicable to this area. Proposed improvements are described in the **Transportation System** chapter, and where applicable, included in the **Projects for Implementation** chapter. Specific federally projects in the ITCTC planning area are included in the latest Transportation Improvement Program, which can be found in the ITCTC website: www.tompkins-co.org/itctc.

7. *A discussion of types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the metropolitan transportation plan. The discussion may focus on policies, programs, or strategies, rather than at the project level. The discussion shall be developed in consultation with Federal, State, and Tribal land management, wildlife, and regulatory agencies. The MPO may establish reasonable timeframes for performing this consultation;*

Response: The requirements of this section are met by the narratives in the **Transportation System** chapter. The ITCTC has developed digital maps that detail the location of environmentally sensitive areas, such as wetlands and natural habitats, in the county. This information will allow projects in every Transportation Improvement Plan to be considered in light of possible environmental impact. Most transportation investment in the Ithaca region involves maintenance and improvement of existing facilities. Severe environmental impacts, as associated with acquisition and development of large rights-of-way, are not planned for or reasonably anticipated.

Pursuant to the SAFETEA-LU guidelines, the ITCTC is working with NYSDOT to implement procedures for meaningful consultation with resource agencies. These consultations will be focused on the environmental impacts of transportation projects. It is in the interest of the MPO and other agencies to better utilize and share existing information.

It is important to mention that the LRTP's direction to promoting alternatives to the drive-alone mode will result in numerous and substantial environmental benefits. Increasing the efficiency of the transportation system by moving away from car dependency will reduce energy use, emissions, and congestion; while at the same time reducing demand for additional or expanded highway facilities.

8. *Identify pedestrian walkway and bicycle transportation facilities in accordance with 23 USC 217(g);*

Response: The 2030 LRTP includes specific goals, objectives, strategies and actions intended to meet this requirement. Maps have been provided showing the general location of proposed facilities in the Transportation System chapter.

The ITCTC intends to continue its involvement with local government committees and other advocacy groups for these modes. This will include interfacing with the City of Ithaca, which has adopted a detailed bicycle system plan and is currently addressing implementation issues, Cornell University, which has developed a specific bicycle/pedestrian plan, and other local governments that currently have or will soon produce detailed, local-level bicycle and pedestrian plans. In addition, the ITCTC will continue to promote development of a countywide network of multiuse trails. The role of the MPO in this area is principally that of coordinator and facilitator, and as a source of technical information and expertise.

Furthermore, activities identified in the Unified Planning Work Program include consideration of bicycle and pedestrian issues to a level commensurate with the state-of-the-practice, local priorities, and available MPO planning resources and capabilities.

9. *Include, as appropriate, transportation and transit enhancement activities;*

Response: Transportation enhancement activities, as currently proposed by the local sponsors, include development of multi-use trail facilities, pedestrian safety improvements, and streetscape improvements for central business district areas. The ITCTC works closely with local communities to help develop eligible projects for the transportation enhancement program.

At the time of writing this document there were five transportation enhancement projects at different stages of implementation in Tompkins County – the Cayuga Waterfront Trail-Phase 2; the Columbia Street Pedestrian Bridge Rehabilitation; the Forest Home Bridge Rehabilitation; Pedestrian Crossing of Rt.13 at Third and Dey St.; Pine Tree Rd. Bicycle and Pedestrian Paths.

Additionally, TCAT is working to improve bus stop infrastructure throughout the County, though not as official federal enhancements. TCAT is continually reviewing its service and routing in the downtown Ithaca area in an effort to facilitate easier transfers and enhance passenger safety during boarding and alighting.

legislative or administrative actions), the FHWA and the FTA will not withdraw the original determination of fiscal constraint; however, in such cases, the FHWA and the FTA will not act on an updated or amended metropolitan transportation plan that does not reflect the changed revenue situation.

10. Include a financial plan that demonstrates how the adopted transportation plan can be implemented. For purposes of transportation system operations and maintenance, the financial plan shall contain system-level estimates of costs and revenue sources that are reasonably expected to be available to adequately operate and maintain Federal-aid highways (as defined by 23 U.S.C. 101(a)(5)) and public transportation (as defined by title 49 U.S.C. Chapter 53). For the purpose of developing the metropolitan transportation plan, the MPO, public transportation operator(s), and State shall cooperatively develop estimates of funds that will be available to support metropolitan transportation plan implementation, as required under §450.314(a). All necessary financial resources from public and private sources that are reasonably expected to be made available to carry out the transportation plan shall be identified. The financial plan shall include recommendations on any additional financing strategies to fund projects and programs included in the metropolitan transportation plan. In the case of new funding sources, strategies for ensuring their availability shall be identified. In developing the financial plan, the MPO shall take into account all projects and strategies proposed for funding under title 23 U.S.C., title 49 U.S.C. Chapter 53 or with other Federal funds; State assistance; local sources; and private participation. Starting December 11, 2007, revenue and cost estimates that support the metropolitan transportation plan must use an inflation rate(s) to reflect “year of expenditure dollars,” based on reasonable financial principles and information, developed cooperatively by the MPO, State(s), and public transportation operator(s). For the outer years of the metropolitan transportation plan (i.e., beyond the first 10 years), the financial plan may reflect aggregate cost ranges/cost bands, as long as the future funding source(s) is reasonably expected to be available to support the projected cost ranges/cost bands. For nonattainment and maintenance areas, the financial plan shall address the specific financial strategies required to ensure the implementation of TCMs in the applicable SIP. For illustrative purposes, the financial plan may (but is not required to) include additional projects that would be included in the adopted transportation plan if additional resources beyond those identified in the financial plan were to become available. In cases that the FHWA and the FTA find a metropolitan transportation plan to be fiscally constrained (i.e., by

Response: This requirement is addressed in the **Financial** section in the **Transportation System** chapter (Ch.4), and in the **Projects for Implementation** sections of this Plan.