

**DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION**

**Metropolitan and Statewide and Nonmetropolitan Transportation Planning
(OMB Control No. 2132-0529)**

JUSTIFICATION STATEMENT

ABSTRACT

This is a request to the Office of Management and Budget (OMB) for a submission of an extension without change of a currently approved collection. The information collection is entitled “Metropolitan and Statewide and Nonmetropolitan Transportation Planning” (OMB Control Number 2132-0529), which is currently due to expire on August 31, 2020, and extend it for three years. The federal funds in this program support transportation planning at metropolitan and statewide levels. There have been no programmatic changes to this program since 2017. However, this request is associated with a decrease in responses from 461 in 2017 to 456 currently (-5). The reduction in the respondents is a result of several small transit agencies in one State, merging into one Metropolitan Planning Organization (MPO). This was at the discretion of the local government and was not a result of any federal policy or regulation change. As a result, there was also a reduction in burden (-900) due to the merger of transit agencies. In addition, there is a change in the cost to the respondents and the cost to the federal government. Both areas have been updated to reflect the current Department of Labor wage category and the 2020 OPM Federal salary table.

Overview:

The FTA and Federal Highway Administration (FHWA) jointly carry out the federal mandate to improve urban and rural transportation. 49 U.S.C. 5303 and 5304 and 23 U.S.C. 134 and 135 authorize the use of federal funds to assist Metropolitan Planning Organizations (MPOs), States, and local public bodies in developing transportation plans and programs to serve the transportation needs of urbanized areas over 50,000 in population and other areas of States outside of urbanized areas. The information collection activities involved in developing the Unified Planning Work Program (UPWP), the Metropolitan Transportation Plan, the Long-Range Statewide Transportation Plan, the Transportation Improvement Program (TIP), and the Statewide Transportation Improvement Program (STIP) are necessary to identify and evaluate the transportation issues and needs in each urbanized area and throughout every State. These products of the transportation planning process are essential elements in the reasonable planning and programming of federally funded transportation investments.

In addition to serving as a management tool for MPOs, the UPWP is used by both FTA and FHWA to monitor the transportation planning activities of MPOs. It also is needed to establish national out year budgets and regional program plans, develop policy on using funds, monitor State and local compliance with technical emphasis areas, respond to Congressional inquiries, prepare Congressional testimony, and ensure efficiency in the use and expenditure of Federal funds by determining that planning proposals are both reasonable and cost-effective.

Definitions:

The Unified Planning Work Program (UPWP) and **State Planning and Research (SP&R) Program** contain information describing transportation and transportation related planning activities anticipated to be undertaken in metropolitan and non-metropolitan areas. The UPWP details the planning work to be performed in metropolitan areas with Federal planning assistance and serves as the Metropolitan Planning Organization (MPO)'s planning grant application for Federal Highway Administration (FHWA) metropolitan planning funds and as the basis of the Federal Transit Administration (FTA) grant application for funding to support metropolitan planning.

The UPWP describes:

- a. Task objectives.
- b. Tangible products expected.
- c. Previous work towards these objectives.
- d. Relationship to other activities.
- e. Agency responsible for work.
- f. Cost and funding source.

The UPWP is required of all MPOs in Transportation Management Areas (TMAs), i.e., all urbanized areas of over 200,000 population and other areas designated by the FHWA and FTA at the request of the MPO and State Governor. MPOs in non-TMAs may also develop UPWPs, although FTA and FHWA may accept more simplified statements of work for these urbanized areas.

Similarly, the State submits planning activities for funding under the FHWA and FTA SP&R program, describing the proposed planning work to be carried out throughout the State. UPWPs and applications for funding under the SP&R program are reviewed and approved by FHWA and FTA for their separate funding programs.

The Metropolitan Transportation Plan (Metropolitan Plan) describes the policies, strategies, and facilities, or changes in facilities, comprised of both capital investment and operational/management strategies, as proposed by State and local officials for future implementation. It is a dynamic document which addresses at least a twenty-year planning horizon, but is reviewed and updated every five years in areas that are in attainment of national ambient air quality standards, and every four years in areas designated as non-attainment or maintenance of those standards. The joint FTA/FHWA planning regulations require that the metropolitan plan be multimodal in nature. It must include a discussion of types of environmental mitigation activities and potential areas for applying them, in consultation with federal, State, and tribal wildlife, land management, and regulatory agencies. The metropolitan plan also must include a financial plan identifying known and reasonable projected revenues to support implementation of projects and strategies included in the plan. In TMAs, the metropolitan plan must reflect consideration of congestion management strategies and performance measures as defined through their Congestion Management Process. Development of the metropolitan plan must also allow for an adequate opportunity for public participation. The metropolitan plan ensures that projects proposed for implementation are based on a continuing, comprehensive, and cooperative planning process.

The Long-Range Statewide Transportation Plan (Statewide Plan). The requirements of the statewide plan are similar to those of the metropolitan plan, with the exception that project-level detail in the statewide plan recommendations, and a supporting financial plan, are optional. Also, the Statewide Plan has no legislatively required update cycles.

The Metropolitan Transportation Improvement Program (TIP) is a management tool for prioritizing and programming projects and strategies for funding by FTA and FHWA for near-term implementation in metropolitan planning areas, covering a minimum four-year period. Updated at least every four years, the TIP must be consistent with the metropolitan plan and reflect the overall transportation goals while identifying the realistic local and federal financial resources that are used to fund infrastructure improvements. Associated with the TIP, a list must be prepared annually of projects from the TIP for which funding was obligated in the previous year, including investments in pedestrian walkways and bicycle transportation facilities.

The Statewide Transportation Improvement Program (STIP) is the management tool for prioritizing and programming projects and strategies for funding by FTA and FHWA for near-term implementation throughout the State. As with the TIP, the STIP must cover a minimum four-year period and be updated at least every four years. The portion of the STIP in a metropolitan planning area is developed in cooperation with the MPO, with metropolitan TIPs included without change, directly or by reference, in the STIP after their approval by the MPO and the State's Governor. The STIP is jointly approved by FTA and FHWA and serves as the basis for funding awards under Title 23 and Title 49, Chapter 53, for the individual projects and strategies included.

In summary, the UPWP identifies transportation planning activities in metropolitan areas and supports the request for funding to support the work under both FTA and FHWA planning programs in metropolitan areas. A similar listing of planning activities is prepared on a statewide level as the basis for FTA and FHWA SP&R funding. The metropolitan plan and statewide plan reflect the long range goals and objectives determined through the metropolitan and statewide transportation planning processes respectively. The TIP and STIP are short-range multi-year listings of highway and transit improvement projects which are consistent with the metropolitan and statewide plans and which support the request for, and receipt of, federal transportation funding under Title 23 U.S.C. and Chapter 53 of Title 49 U.S.C.

1. Explain the circumstances that make information collection necessary.

FTA and FHWA jointly carry out the federal mandate to improve metropolitan and statewide transportation under authority of Title 49, Chapter 53, and Title 23 of the United States Code. Sections 5305(g) of Title 49 and 104(f) of Title 23 authorize funds to support transportation planning at metropolitan and statewide levels. As a condition to receive Title 49, Chapter 53, and Title 23 funding, requirements are established for metropolitan and statewide transportation planning under Sections 5303 and 5304 of Title 49 and Sections 134 and 135 of Title 23 that call for development of transportation plans and transportation improvement programs in all States and metropolitan areas. The information collection activities necessary to prepare federally required plans and programs, and the supporting planning studies proposed for funding in UPWPs and under the SP&R work programs are necessary to monitor and evaluate current and projected usage and

performance of transportation systems nationwide - in each urbanized area and throughout every State.

The metropolitan transportation plan and TIP are required by Sections 49 U.S.C. 5303 and 23 U.S.C. 134, which state that "metropolitan planning organizations, in cooperation with the State, shall develop transportation plans and programs for urbanized areas of the State." 49 U.S.C. 5304 and 23 U.S.C. 135 require that each "State shall develop a long-range transportation plan and STIP for all areas of the State." Both statutory sections require that "the process for developing such plans and programs shall provide for consideration of all modes of transportation and shall be continuing, cooperative, and comprehensive." MPOs and States use metropolitan and statewide plans, TIPs, and STIPs as the basis for investing federal and non-federal capital funds for transportation infrastructure investments. (Note: Paperwork Reduction Act requirements for preparation of the STIP are covered by OMB control number 2125-0039.)

23 CFR Part 450 implements these statutory requirements. (Note: 23 CFR Part 450 is identical to, and cross-referenced by, the equivalent regulation in Title 49, 49 CFR Part 613.) The MPO, together with the State and public transportation operators, prepares plans for each urbanized area, while the State develops a statewide plan, which, in metropolitan areas, is developed in cooperation with affected MPOs. Additionally, metropolitan plans developed under the statutory and regulatory requirements cited above in nonattainment and maintenance areas must be found by FTA/FHWA to be in conformity with State Implementation Plans (SIP) for attaining Environmental Protection Agency ambient air quality standards. These plans form the basis for development of TIPs and STIPs, the short-range programming documents for federally-funded transportation capital investments.

A UPWP is required by 23 CFR 450.308 for all MPOs in TMAs. MPOs in urbanized areas of less than 200,000 in population, with prior approval by the State, FTA, and FHWA, may use a simplified statement of work as their planning grant application instead of developing a full UPWP. Details of the required planning processes supported by FTA and FHWA metropolitan planning funds, as required by Section 5303 of Title 49 U.S.C. and 23 U.S.C. 134, are set out in 23 CFR 450. The planning grant application is based upon a cooperative State and locally developed and endorsed UPWP and is the mechanism by which grantees request federal funding. The information contained in the UPWP is necessary to establish the eligibility of the activities for which funding is being requested.

2. Indicate how, by whom, and for what purpose the information is to be used.

Preparation of UPWPs, project listing for SP&R funding, metropolitan and statewide plans, TIPs, and STIPs are essential components of decision-making by State and local officials for planning and programming federal transportation dollars to support the priority transportation investment needs of their areas. In addition to serving as the grant application by States for FHWA and FTA planning funds in metropolitan areas, UPWPs are used by FTA and FHWA on a national scale to establish national out year budgets and regional program plans, develop policy on using funds, monitor State and local consistency with national planning and technical emphasis areas, respond to Congressional inquiries, prepare congressional testimony, and ensure efficiency in the use and expenditure of federal funds by determining that planning proposals are reasonable, cost-effective, and supportive of full compliance with all applicable federal law and regulations.

When reviewing UPWPs, FTA and FHWA evaluate:

- a. the grantee's ability to carry out the work program;
- b. the eligibility of each work task for funding;
- c. the ability of the collective work tasks to ensure full compliance with all applicable federal laws and regulations; and
- d. the inclusion of tasks reflecting areas of national planning emphasis.

Sections 5303 and 5304 of 49 U.S.C. and Sections 134 and 135 of 23 U.S.C. require the development of plans and programs in all urbanized areas and entire States respectively. After approval by the Governor and MPO, metropolitan TIPs in attainment areas are to be incorporated directly into the STIP. For nonattainment areas, as required by the Clean Air Act Amendments of 1990 (CAAA), FTA/FHWA must make a conformity finding on these areas' plans and TIPs before TIPs are incorporated into STIPs.

The complete STIP is then jointly reviewed and approved (or disapproved) by FTA and FHWA. With that action comes a joint determination, or finding, by FTA and FHWA that metropolitan and statewide planning processes are in compliance with all applicable federal laws and regulations. These planning “findings,” conformity determinations, and approval actions constitute the determination that State and metropolitan area transportation planning processes are complying with federal law and regulatory requirements - as a condition of eligibility for receiving federal-aid. Without the supporting documents, these “findings” and planning approvals cannot be made as the basis for making project-level grant awards.

Requirements of the TIP and STIP as described by 23 CFR Part 450 are:

Identification of projects - since a STIP/TIP is made up of various types of capital and non-capital surface transportation projects, from equipment acquisition to major highway and transit-way construction, it is essential that these projects be identified and described.

Estimated cost - since the STIP/TIP is the basis for subsequent programming and obligation of both Federal Aid Highway and FTA capital funds, there must be an indication of project cost and federal funds required.

Source of Federal funds - The STIP/TIP is an integrated FTA/FHWA program. Because both agencies have several statutory sources of funds, each with different eligibility requirements, it is necessary to know what projects are proposed to be funded from which fund.

Identification of the recipient - Because the STIP/TIP is an integrated program of highway and transit improvements, many potential capital grant recipients have projects included in the document. For FTA funding, it is necessary that each individual project be identified as to the likely capital grant applicant.

In nonattainment areas, the TIP must also identify and give priority to Transportation Control Measures (TCM) included in an approved State Implementation Plan (as required by the Clean Air Act) for air quality attainment and must describe how these TCMs are to be implemented. Projects included in nonattainment area TIPs must be described in sufficient detail to permit air quality analysis for the purpose of making a conformity determination.

In addition to the air quality analysis for nonattainment areas, FTA and FHWA's review of all areas must ensure that:

- a. Programmed projects are consistent with long range plans.
- b. Projects reflect the areas' priorities and are consistent with the anticipated availability of funds.
- c. The MPO and State Governor approve the metropolitan TIP and it is incorporated, without change, into the STIP.
- d. An opportunity for public comment was provided during the development of the STIP/TIP.

The STIP/TIP requirement reduces the burden to potential capital grant applicants by imposing the programming requirements at one point and setting one response to these requirements.

3. Describe to what extent the collection of information involves the use of automated or other technological collection techniques and any consideration of using information technology to reduce burden.

The SP&R program, UPWP, metropolitan and statewide plan, TIP, and STIP are adaptable to computer generation and revision. Both FTA and FHWA have extensive technical assistance programs encouraging application of computer techniques. These programs reduce burden by achieving time-savings in technical analysis, report revisions, and clerical activities through automation. The planning products that MPO's produce, including the TIP, the metropolitan plans, the STIP, and the state plans are the products of the local transportation planning process, so there is no specific format required. These documents are posted to the MPO's and State DOT's public websites so they can be made available for review and comment by the public and local elected officials and decision-makers in a manner that supports local transportation planning needs. The FTA and FHWA do not require that the planning products be submitted to FTA or FHWA in hard copy, but only that they be made available for review, and every MPO and State DOT maintains these products on their websites. Examples of these documents will be submitted into ROCIS under the supplemental section.

4. Describe efforts to identify duplication. Show specifically why similar information already available cannot be used or modified for use for the purposes described.

While the transit and highway funding programs for planning and project implementation are unique to FTA and FHWA, FTA and FHWA cooperate to avoid duplication of effort. Most visible is consolidating FTA and FHWA statutory requirements for planning through the issuance of joint planning regulations. MPOs and States prepare a single set of UPWPs, plans, TIPs, and STIPs to satisfy both FTA and FHWA requirements.

The information contained in projects proposed for funding under the SP&R programs, UPWPs, metropolitan and state plans, TIPs, and STIPs are not contained in any other federally required document. However, where this information is already contained in State and local planning documents, that can be accepted, provided all FTA and FHWA requirements are met, thus further reducing any duplication and unnecessary burden.

5. Describe methods used to minimize burden on small businesses or other small entities.

The SP&R programs, UPWPs, transportation plans, STIP/TIPs, and associated data collection does not involve small businesses. However, FTA and FHWA have eliminated several significant technical and administrative requirements which permit small urbanized areas to develop work activities which meet their own needs. 23 CFR 450.308 also provides for simplified procedures and a five-year update cycle for the development of plans in metropolitan areas which are in attainment of transportation air quality standards.

6. Describe the consequences to federal program or policy activities if collection were conducted less frequently.

Less frequent data collection is not possible since it would not allow sufficiently current and accurate work descriptions and budget estimates. Furthermore, the schedules for planning documents set forth in the regulations are identical to provisions set forth in the FAST Act.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with 5 CFR 1320.6.

The information collected is consistent with the guidelines in 5 CFR 1320.6. Previous SP&R programs, UPWPs, plans, and STIP/TIPs need not be retained after revisions are made. Consequently, retention falls within the four-year requirement. The 20-year plan horizon cited in the joint planning regulations refers to an analysis period and not a record retention period.

8. Describe efforts to consult with persons outside the agency to obtain their views.

A 60-day Federal Register notice was published on April 10, 2020 Vol. 85, No. 70 (Pages 20336-20337) soliciting comments prior to submission to the Office of Management and Budget (OMB). No comments were received. A 30-Day Federal Register notice was published on August 21, 2020 Vol. 85, No. 163 (page 51843-51844).

9. Explain any decision to provide any payment or gift to respondents.

No payment or gift is made to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in the statute, regulation or agency policy.

There is no assurance of confidentiality given regarding submission of the information collected. The data is used for determining eligibility for receipt of grant funds and compliance with statutory requirements. All information collected is certified to comply with the Freedom of Information Act, the Privacy Act of 1974, and OMB Circular A-108.

11. Provide any additional information for questions of a sensitive nature.

The documents do not require any information of a sensitive nature such as sexual behavior or attitudes, religious beliefs, or other matters that are commonly considered private. None of the information required is of a personal nature.

12. Provide an estimate of the hour burden of the collection of information and annualized cost to respondents.

Respondents: State Departments of Transportation and MPOs.

Estimated Annual Respondents: 456 respondents.

Estimated Total Annual Burden: 4,198,379 hours.

Frequency: Annual.

The following summarizes in tabular form the estimated burden hours for the collection of information for the purposes of developing and completing UPWPs, metropolitan and statewide transportation plans, and TIPs/STIPs and an explanation of the methodology used to calculate the number of hours required per submission. There are 456 entities required to submit information under this requirement which includes 52 State DOT's, and 404 MPO's. Those MPOs that are located in Urbanized Areas with a population over 200,000, and those MPO that are designated Non-Attainment areas, are required to complete additional reporting. Thus, in the following tabulations, the MPO's are differentiated by population size, and attainment vs. nonattainment/maintenance status to calculate total burden hours.

Unified Planning Work Programs (UPWPs) –

<u>Urbanized Area (UZA) Pop.</u>	<u>Number of Entities</u>	<u>Total Annual Submissions</u>	<u>Burden Hours per Submission</u>	<u>Total Annual Burden Hours</u>
Under 200,000	202	202	200	40,400
Over 200,000	<u>202</u>	<u>202</u>	300	<u>60,600</u>
TOTAL	404	404	--	101,000

Transportation Improvement Programs (TIPs and STIPs) –

<u>Total</u>	<u>Avg. of States & MPOs</u>	<u>Total Annual Submissions</u>	<u>Hours per Submission</u>	<u>Annual Hours</u>
MPOs in Attainment Areas	273	68	6,092	415,779
MPOs in Nonattainment and Maintenance Areas	131	33	22,570	739,164
State DOTs	<u>52</u>	<u>13</u>	<u>20,542</u>	<u>267,042</u>

TOTAL	456	114	--	1,421,985
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Transportation Plans –

	Number of Entities	Total Annual Submission	Burden Hours per Submission	Total Annual Burden Hours
MPOs in Attainment Areas	273	55	11,005	600,884
MPOs in Nonattainment and Maintenance Areas	131	33	49,606	1,624,612
State DOTs	<u>52</u>	<u>13</u>	<u>34,608</u>	<u>449,898</u>
TOTAL	456	101	--	2,675,394

TOTAL ANNUAL BURDEN HOURS

Burden Hours

UPWPs	101,900
TIP/STIPs Plans	1,421,985
HOPE	<u>2,675,394</u>
TOTAL	300
	4,198,379

TOTAL ANNUAL HOUR BURDEN COST³

Burden Cost w/o Overhead

UPWPs	\$ 3,547,120
TIPs	40,561,598
Metropolitan Plans	78,159,420
STIPs	9,378,515
Statewide Plans	<u>15,800,418</u>
TOTAL	\$147,457,606

Estimated cost to the respondents: UPWP

The respondent's cost is the cost of the MPOs' and State agencies' staff time required to compile and produce the UPWP. UPWPs must be developed identifying work activities over the next one or two-year period. Given the complex nature of the planning requirements, we estimate that an average of 300 hours per respondent will be required by MPOs to prepare UPWPs in TMAs and 200 hours per respondent in non-TMAs. Note that although 23 CFR 450.308 allows MPOs in the

202 non-TMAs to prepare simplified statements of work, FTA and FHWA know of no MPOs that are developing such simplified statements.

According to the Bureau of Labor Statistics (BLS) the hourly salary for an Urban and Regional Planner (19-3051) <https://www.bls.gov/oes/current/oes193051.htm> is \$35.75 per hour total respondent cost is estimated at \$3,547,120. Assuming a 28 percent overhead rate, the total annualized cost with overhead is estimated to be \$4,540,314.

2010 Census	TMA's	UZA's	TOTAL
UPWP	202	202	404
Annual Submittals	22	202	404
Hours per Submittal	300	200	
Total Hours	60,600	40,400	101,000
Cost per hour	\$35.12	\$35.12	
Cost	\$2,128,272	\$1,418,848	\$3,547,120
Overhead		1.28	
Total Cost with overhead			\$4,540,314

OMB has previously approved the burden on respondents to develop State (SPR) work programs under FHWA control number 2125-0039.

Estimated cost to the respondents: TIP/STIP

Metropolitan TIPs are prepared by MPOs in cooperation with the State and local public transportation operators. TIPs are required every four years; plans in nonattainment and maintenance areas must be updated and submitted to FTA/FHWA every four years and in attainment areas every five years. Although the requirements for metropolitan TIPs and plans, particularly in nonattainment areas, are complex, current burden estimates have been generated from past experiences, informal discussion with both FTA/FHWA field staff and respondents, and a comparison of recent trends in the allocation of resources by respondents to meet the requirements. We estimate that MPOs in attainment areas will spend approximately 6,092 person hours in the development of the TIP document. Furthermore, considering the more stringent requirements relating to the implementation of Transportation Control Measures in nonattainment areas and the fact that most of these areas are in the Nation's largest metropolitan areas with the most projects to program, we estimate that an average of 22,570 person hours per submission are required for these TIPs.

TIPS	Attainment TIPS	Non Attainment TIPS	Total
MPOS	273	131	404
Annual Submittals	68	33	101
Hours per Submittal	6,092	22,570	
Total Hours	415,779	739,164	1,154,943
Cost per hour	\$ 35.12	\$35.12	

Cost	\$14,602,175	\$ 25,959,423	\$ 40,561,598
Overhead (28%)		\$ 1.28	
Total Cost with overhead			\$ 51,918,846

The development by States of a STIP draws heavily on the work cooperatively done by MPOs and States in the preparation of metropolitan TIPs. This work burden has already been calculated in this section; however, to the extent that STIPs must reflect the programming of transportation projects in nonmetropolitan areas, there exists some marginal burden in the development of the overall statewide program. We estimate that burden at 20,542 person hours is required for each STIP.

STIPS	52	
Annual Submittals	13	
Hours per submittal	20,542	
Total hours	267,042	
Cost per hour	\$35.12	
Total cost		\$9,378,515
Overhead (54%)	\$1.28	
Total Cost with overhead		\$12,004,499

Total respondent burden hours for the TIP/STIP development are estimated to be 1,421,985. Total respondent cost for TIP/STIP development without overhead is estimated to be \$49,940,113. Total respondent cost for TIP/STIP development assuming a 28 percent overhead rate is estimated to be \$63,923,345.

TIPS and STIPS	
Total Hours	1,421,985
Total Cost without overhead	\$49,940,113
Total Cost with overhead (54%)	\$63,923,345

Transportation Plans

The Joint Planning Regulations require that plans in nonattainment and maintenance areas be updated and submitted to FTA/FHWA every four years and that plans in attainment areas be updated every five years. The development by States of a statewide plan draws heavily on the work cooperatively done by MPOs and States in the preparation of metropolitan TIPs and plans. This work burden has already been calculated in this section; however, to the extent that statewide plans must reflect the planning of transportation projects in nonmetropolitan areas, there exists some marginal burden in the development of the overall plan. We estimate that burden at 49,606 person hours are required for the preparation of the plan in a non-attainment area. These plans are updated every four years. We estimate that burden at 11,005 person hours are required for the preparation of the plan in an attainment area. These plans are updated every five years. Assuming an average rate of \$35.12/ hour we estimate that the respondent cost for the metropolitan plan is \$78,159,420 and for the statewide plan is \$15,800,418. These amounts are calculated below:

Metropolitan Plans			
	Attainment Plans	Non Attainment Plans	Total
MPOs	273	131	404
Submittals	55	33	87
Hours per Submittal	11,005	49,606	
Total Hours	600,884	1,624,612	2,225,496
Cost per hour	\$35.12	\$35.12	
Cost	\$21,103,043	\$52,056,376	\$78,159,420
Overhead		1.28	
Total Cost with overhead			\$ 100,044,057
Statewide LRP	52		
Submittals	13		
Hours per Submittal	34,608		
Total hours			449,898
Cost per hour	\$35.12		
Cost			\$15,800,418
Overhead		1.28	
Total Cost with overhead			\$20,224,535

Total respondent burden hours for the plan development by States and MPOs are estimated to be 2,675,394. Total respondent cost for plan development without overhead is estimated to be \$87,191,091. Total respondent cost for plan development assuming a 28 percent overhead rate is estimated to be \$134,274,280.

Metropolitan and Statewide Plans	
Total Hours	2,675,394
Total Cost without overhead	\$93,959,838
Total Cost with overhead	\$120,268,592

13. Provide estimate of annualized cost to respondents or record keepers resulting from the collection of information (not including the cost of any hour burden shown in Items 12 and 14).

There are no capital or start-up costs associated directly with the collection of information required by the UPWPs, TIPs/STIPs, and plans. Any capital equipment used to provide this information in most cases would have been purchased to carry out general transportation and air quality planning activities. The total annual overhead (operation and maintenance costs) of providing the requested information is \$41,288,130 as calculated in the table below:

Total Annual Burden Costs			
	w/overhead	w/o overhead	Overhead Costs
Tasks	Total Burden Cost	Total Burden Cost	
	\$	\$	\$
UPWP	4,540,314	3,547,120	993,194
	\$	\$	\$
TIP's	51,918,846	40,561,598	11,357,247
	\$	\$	\$
Metropolitan Plans	100,044,057	78,159,420	21,884,637
STIPS	\$12,004,499	\$9,378,515	\$2,625,984
Statewide Plans	\$20,224,535	\$15,800,418	\$4,424,117
	\$	\$	\$
HOPE	13,486	10,536	\$2,950
	\$	\$	\$
	188,745,736	147,457,606	41,288,130

Total Annual Burden Costs including Performance Based Planning (15% increase)			
	w/overhead	w/o overhead	Overhead Costs
Tasks	Total Burden Cost	Total Burden Cost	
UPWP	\$5,221,361	\$4,079,188	\$1,142,173
TIP's	\$59,706,672	\$46,645,838	\$13,060,835
Metropolitan Plans	\$115,050,666	\$89,883,332	\$25,167,333
STIPS	\$13,805,174	\$10,785,292	\$3,019,882
Statewide Plans	\$23,258,215	\$18,170,480	\$5,087,735
HOPE	\$15,509	\$12,116	\$3,393
	\$217,057,597	\$169,576,247	\$47,481,349

14. Provide estimates of annualized cost to the federal government.

a. Cost to the federal government: UPWP

The UPWP is a required statement of proposed planning activities to be undertaken by MPOs, in cooperation with States and public transportation operators, which forms the basis for FTA and FHWA to make funds available to State DOTs for financing the proposed work.

MPOs submit a UPWP at least biennially (although in practice most MPOs submit UPWPs annually). The federal government's cost is limited to the cost of FTA and FHWA staff time required in consultation with the MPOs and State DOTs during preparation of the UPWP and in reviewing the document or negotiating any revisions that may be necessary. This effort is done by FTA and FHWA field staff and is estimated to require about 10 hours to review each UPWP per year. At an average hourly rate of \$52.47 for GS-13 staff, the

annual federal cost of reviewing UPWPs for TMAs, including overhead, is estimated to be approximately \$211,979 and is calculated as follows:

- 404 submissions x 10 hours per submission = 4,040 hours
- 4,040 hours x \$52.47 hour = \$211,979

Please note that each State DOT also submits a statewide planning work program, which serves as the basis of the State's application for federal financial assistance for planning activities. Typically, a State's work program incorporates UPWPs with less detailed work plans developed by MPOs in urbanized areas below 200,000 population in cooperation with the State and local public transportation operators. The statewide work program also describes the planning activities to be undertaken in rural areas and other activities. The information collection requirements of the State work program have been previously approved by the Office of Management and Budget under FHWA control number 2125-0039.

b. Cost to the federal government: Metropolitan TIPs/Plans

Each of the nation's 131 MPOs in nonattainment and maintenance areas submits to FTA/FHWA their plans and TIPs for conformity determinations. Plans and TIPs in other areas are submitted for informational purposes. We estimate that the reviews of these documents in the 273 attainment areas consume a minimum of 20 hours per submission. Furthermore, FTA and FHWA must make a joint conformity finding for any new or amended TIP and for new or updated plans in the approximately 131 nonattainment and maintenance areas nationally for ozone, carbon monoxide, and PM₁₀. We estimate that this conformity determination will take an additional 20 hours per finding.

Transportation Improvement Programs (TIPs)

TIPs are required to be submitted at least every four years; however, they may be amended at any time. We estimate that each amendment requires 5 person hours of FTA and FHWA staff time. FTA and FHWA may also be required to make new conformity findings for nonattainment and maintenance area TIP amendments. We estimate that perhaps 50 percent of all TIPs will be amended, and that, consequently, 50 percent of nonattainment area TIPs may be subject to more than one conformity finding every four years.

Given the above, we estimate that with an average grade of GS-13 (\$52.47 per hour), the annual federal cost, including overhead, is \$177,217 for TIP reviews and amendments as determined by the following:

- 404 TIP submissions every four years = 101 submissions/year
- 101 submissions x 20 hours x \$52.47 = \$105,989
- 50 percent TIP amendments every year = 51 submissions/year
- 50.5 amendments x 5 hours x \$52.47 = \$13,249
- 131 conformity findings every four years = 32.75 findings/year
- 32.75 findings x 20 hours x \$52.47 = \$34,368
- 50 percent conformity findings for TIP amendments in nonattainment areas every year = 30 additional conformity findings/year.

- 30 findings x 15 hours x \$52.47 = \$23,612
- Total annualized cost = \$105,989 + \$13,249 + \$34,368 + \$23,612 = \$177,217

Metropolitan Plans

Plans in the 131 nonattainment areas must be updated and reviewed every four years and in the 273 attainment areas every five years. The annual federal cost for reviewing metropolitan plans is \$126,033 and is determined by the following:

- 273 attainment plan submissions every five years = 54.6 submissions/year
- 54.6 submissions x 20 hours x \$52.47 = \$57,297
- 131 nonattainment area plan submissions every four years = 32.75 submissions/year
- 32.75 submissions x 40* hours x \$52.75 = \$68,736
- Total annualized cost = \$57,297 + \$68,736 = \$126,033

*20 hours for basic review and 20 hours for conformity finding = 40 hours

c. STIP/State Plan

Statewide Transportation Improvement Programs (STIPs)

The STIP is the financially constrained program of an entire State's FTA- and FHWA-funded (and other significant) transportation projects. It includes, either directly or by reference, TIPs prepared by MPOs for metropolitan areas. When included directly, the review of a TIP may occur within the context of a STIP submission, although FTA and FHWA must make a separate conformity determination on all TIPs in nonattainment areas before these TIPs can be included in the STIP (see 14b). Review and approval of the STIP, then, basically consists of the sum total of metropolitan TIP reviews (as described in 14b) plus reviews of programmed projects in rural areas and the statewide public participation process.

The FTA/FHWA review of the STIP is estimated at 20 person hours and of STIP amendments at 5 person hours. Although STIPs must be submitted a minimum of every four years, they may be amended at any time. Estimating that 50 percent of STIPs will be amended, the federal cost, including overhead, of STIP approvals is \$15,347, and is computed as follows:

- 52 STIP submissions every four years =13 submissions/year.
- 13 submissions x 20 hours x \$52.47 = \$13,642
- 50 percent STIP amendments every four years = 6.5 additional findings/year
- 6.5 findings x 5 hours x \$52.47 = \$1,707
- Total annualized cost = \$15,347

Statewide Plan

The statewide plan requirement was continued under the FAST Act. The statewide plan is a required product of each of the 50 States, Puerto Rico, and the District of Columbia. The portion of the plan in metropolitan areas is to be developed in cooperation with MPOs. The review of this portion of the statewide plan occurs during the review of the metropolitan

plan (see 14b for burden estimates). Review of the overall statewide plan is estimated at 10 hours.

23 CFR 450, Section 214 requires that statewide plans be “periodically updated.” Assuming a reasonable update cycle of 5 years, the cost of the federal government of statewide plan review is estimated at \$5,457.

- 52 plan submissions every five years = 10.4 submissions/year
- 10.4 submissions x 10 hours x \$52.47 = \$5,457
- Total annualized cost = \$5,457

Helping Obtain Prosperity for Everyone Planning Program

The Helping Obtain Prosperity for Everyone (HOPE) program provides funding for planning, engineering and technical studies and financial plans that will result in improved public transportation, new transit routes and facilities, and innovative technologies in communities experiencing persistent poverty. The HOPE discretionary grant program provides \$8.5 million to selected transit providers, State DOTs and MPOs to do planning and technical studies to support improved transit in areas of persistent poverty. The planning activities funded under the HOPE program are consistent with the activities undertaken by MPOs and State DOTs as part of the metropolitan and statewide planning process. It is a discretionary grant program that will provides \$8.5 million to selected regions to do planning and technical studies to support improved transit in areas of persistent poverty.

It is anticipated that the HOPE Project will receive additional funding and the require the following annual burden hour and cost estimates.

- 15 proposals submissions every year = 15 submissions/year
- 15 submissions x 20 hours x \$52.47 = \$15,741
- Total annualized cost = \$15,741

15. Explain the reasons for any program changes or adjustments reported to the OMB.

There have been no programmatic changes to this program since 2017. However, this request is associated with a decrease in responses from 461 in 2017 to 456 currently (-5). The reduction in the respondents is a result of several small transit agencies in one State, merging into one Metropolitan Planning Organization (MPO). This was at the discretion of the local government and was not a result of any federal policy or regulation change. As a result, there was also a reduction in burden (-900) due to the merger of transit agencies. In addition, there is a change in the cost to the respondents and the cost to the federal government. Both areas have been updated to reflect the current Department of Labor wage category and the 2020 OPM Federal salary table. The cost were updated to apply revised labor costs for inflation, a new uniform overhead/fringe benefits rate used by all Department of Transportation modes, and the addition of the HOPE discretionary grant program.

16. Outline plans for tabulation and publication and address any complex analytical techniques that will be used.

There are no plans for publishing the results or contents of the UPWPs, plans, or TIPs submitted or for any tabulation or statistical analysis.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Not applicable.

18. Explain each exception to the certification for Paperwork Reduction Act submissions of OMB Form 83-I.

Not applicable.