

11. NEXT STEPS

The DTOGS Alternatives Analysis is the first of many steps in the FTA’s New Starts project development process. The DTOGS project has culminated in the selection of LRT on Woodward Avenue between downtown Detroit and the Michigan State Fairgrounds as the Locally Preferred Alternative, along with three options for serving downtown Detroit. This section describes the steps that DDOT and its planning partners must undertake to continue its progress in the New Starts process. These next steps are divided into regional, local, and federal actions. Regional actions are identified first in this section because local actions and federal coordination are lengthier and more prescriptive than the former. Local actions and federal coordination would occur concurrently with the regional actions described as follows. The proposed overall schedule for completing these next steps – which include submitting the PE application to FTA – is in the second half of 2008.

11.1 Regional Actions

The primary requirement under this category is SEMCOG’s adoption of the LPA in its RTP and Transportation Improvement Plan (TIP). The New Starts process requires these two actions as well prior to commencement of the application to enter PE.

11.1.1 SEMCOG RTP Amendment

The RTP is Southeast Michigan’s long-term transportation plan and includes both programmed (funded) and planned projects. It is financially-constrained and must comply with the Clean Air Act. The region has been designated as marginal non-attainment for ozone and non-attainment for fine particulate matter. As such, projects to be added to or deleted from the SEMCOG RTP and TIP “will not worsen air quality or delay the timely attainment of national air quality standards.”¹ Further, federal requirements dictate demonstrating conformity at least once every three years and whenever the RTP or TIP is updated. SEMCOG’s adoption of light rail on Woodward Avenue between downtown and Detroit and the Michigan State Fairgrounds into its RTP and TIP, therefore, entails running its air quality models to demonstrate that proposed transit project will, at a minimum, maintain air quality standards for the region.

¹ Source: <http://www.semco.org/CurrentAirQualityDesignations.aspx>

The RTP amendment process requires several pieces of information regarding the DTOGS project including:

- A summary description of the project
- Project justification statement
- Project estimated costs (capital and O&M)
- Conceptual funding sources
- Travel demand model with the LPA (for air quality modeling)
- Description of public involvement process.

In the summer of 2008, the SEMCOG RTP was amended to include light rail on Woodward Avenue between downtown Detroit and the State Fairgrounds as the DTOGS project LPA. The RTP amendment process entails review and approval by three entities within SEMCOG: the Transportation Advisory Council (TAC), Executive Committee, and General Assembly the key dates in the process are presented in **Table 11-1**.

Table 11-1
SEMCOG RTP Amendment Schedule

RTP Amendment-Related Action	Date	Status
Public comment	April 7, 2008 to June 26, 2008	Concluded
TAC Review/Approval	April 23, 2008	Adopted
Executive Committee Review/Approval	May 8, 2008	Adopted
General Assembly Review/Approval	June 26, 2008	Adopted

Following the amendment of the RTP, the following SEMCOG action was the amendment of its TIP, described in the next section.

11.1.2 SEMCOG TIP Amendment

The second step was amending SEMCOG’s short-range TIP. All TIP amendments must be reviewed with the same scrutiny as the original TIP. Inclusion in the TIP requires a project to be submitted by a SEMCOG member and recommended for inclusion in the TIP by a series of three committees: the TIP Development Committee (TIPDC), TAC and Executive Committee. (The TIPDC is an advisory committee to the TAC.) After review by the Executive Committee, the TIP amendment is submitted to the governor of Michigan for approval. Following approval by the governor, it is then reviewed and receives final approval from the Federal Highway Administration (FHWA), FTA, and Environmental Protection Agency (EPA).

As in the RTP amendment process, public involvement and comment are key to the TIP amendment process. The public is invited to comment on proposed amendments to the TIP during a 30-day public comment period. **Table 11-2** presents the TIP amendment schedule as it related to the inclusion of the DTOGS project LPA.

**Table 11-2
SEMCOG TIP Amendment Schedule**

TIP Amendment-Related Action	Date	Status
Public comment	June 24, 2008 to July 24, 2008	Concluded
TIPDC Review/Approval	July 18, 2008	Adopted
TAC Review/Approval	July 23, 2008	Adopted
Executive Committee Review/Approval	July 24, 2008	Adopted

11.2 Local Actions

At this time, the project sponsor responsible for advancing LRT on Woodward Avenue between downtown Detroit and the State Fairgrounds is DDOT. Between the AA and submitting the request to enter PE to the FTA, DDOT has the following tasks to complete:

11.2.1 Determine Transportation User Benefits

This task entails incorporating the Summit software into the SEMCOG Hybrid model to determine Transportation User Benefits (TSUB) as defined by FTA. This, in turn, will result in a CEI for light rail on Woodward Avenue, as defined by current New Starts policies and rules. As previously stated, the LPA must receive an overall rating of Medium to qualify for New Starts funding. As part of this process, FTA will review ridership forecasting methodology, assumptions and results.

11.2.2 Refine Downtown Concepts

The three downtown Detroit conceptual alignments identified during the DTOGS project require refinement so that perhaps one preferred alignment might be included in preliminary engineering. Part of this task could include a workshop with downtown stakeholders to identify various needs and to agree on the approach that will lead to the selection of a preferred downtown alignment.

11.2.3 Refine TSM/Develop Baseline Alternative

Based on the evaluation of alternatives detailed in Section 8: Evaluation of Alternatives, the proposed skip-stop service (Route 53T) of the Woodward TSM Alternative would yield low ridership. The major contributing factor to this is the high level of transit service currently provided by Route 53 (service every eight minutes). It is possible that without the travel time advantage presented by a fixed guideway transit service, additional bus improvements would yield diminishing ridership and route efficiency returns. Under this task, DDOT will refine the TSM Alternative that is likely to result in the definition of the Baseline Alternative for inclusion in the DEIS and/or Preliminary Engineering.

11.2.4 Develop Base Mapping and Utility Coordination

This is essentially a data collection task and would entail aerial photography, planimetric mapping, surveying, developing TIN models for profiles, and utility coordination. Utility coordination includes understanding existing utility agreements between MDOT – who has jurisdiction over Woodward Avenue – and potentially the City of Detroit, as well as private utilities with infrastructure within the public right-of-way. Given MDOT’s experience with utilities related to the recent reconstruction of Michigan Avenue between Livernois and Wyoming Streets, the task of collecting existing information on utilities should begin as soon as possible.

This task will support various elements of planning and design, including engineering capital cost estimating, and CEI calculation. Specific conceptual design tasks that could use this information include refinement of downtown Detroit alignments and development of concepts for a light rail yard and shop.

11.2.5 Prepare Draft Before and After Study Documentation

The FTA requires preparation of a “Before and After Study Documentation of Methods and ‘Predicted’ Results and Identification of Responsible Contractors” as part of the New Starts process. This requirement documents how a New Starts project may develop and/or change over time and is a means to improve the effectiveness and public accountability of the New Starts program.² “Before” conditions include a documentation of existing traffic, transit, parking, ridership and cost characteristics within the study. For this stage in the New Starts process, a draft document will be submitted to the FTA.

² Source: http://www.fta.dot.gov/documents/Before_and_After_Studies_Report_2007_-_Final.pdf

11.2.6 Continue NEPA Documentation

As federal funds will be requested to implement the DTOGS project LPA, such an action must comply with federal, state and local environmental regulations during the planning, design and construction of this major transit facility. The FTA web site describes the FTA NEPA process as follows:

“The regulations of the Council on Environmental Quality (CEQ) implementing NEPA ensure that information on the social and environmental impacts of any federally funded action is available to public officials and citizens *before decisions are made and before actions are taken*. NEPA regulations direct Federal agencies to integrate into their planning and decision-making the natural and social sciences, environmental amenities and values, and the design arts along with the necessary engineering and economic considerations. The objective is to balance infrastructure development, economic prosperity, health and environmental protection, community and neighborhood preservation, and quality of life.

In addition to NEPA, the provisions of other statutes, regulations and executive orders affect the decision-making on federally assisted transportation projects. These mandates and considerations cover such concerns as air and water quality, historic preservation, parklands protection, habitat preservation, civil rights and social burdens of transportation investments. FTA uses the NEPA process as the overarching umbrella under which the mandates and considerations of all laws affecting transit project development are considered.”³

In September of 2008, a Draft Environmental Impact Statement (DEIS) exploring the potential impacts of LRT on Woodward Avenue was initiated. Scoping as part of the DEIS will provide an opportunity for the public and resource agencies to identify transportation alternatives and issues to be considered in the DEIS. The DEIS will identify various impacts including Social and Land Use, Economic, Environmental and Transportation. It will also identify mitigation measures as appropriate.

³ Source: http://www.fta.dot.gov/planning/environment/planning_environment_224.html

11.2.7 Prepare Application to Enter PE

Project Management Plan (PMP)

To advance into PE, a PMP must be developed and approved by the FTA and must include the following.⁴ The PMP subcategories listed below are per 49 CFR 633 and FTA's P&CM Guidelines.

- Basic Requirements
 - Project Sponsor Staff Organization
 - Project Budget & Schedule
- Procedures
 - Document Control Procedures
 - Change Order Procedures
 - Material Testing Procedures
 - Internal Reporting Procedures
 - Operational Testing Procedures
 - Quality Assurance/Quality Control (QA/QC)
- Plans
 - Contracting Plan for Preliminary Engineering Phase
 - Contingency Management Plan (identifying significant uncertainty in scope, cost, and schedule)
 - Real Estate Acquisition Management Plan (RAMP)
 - Rail Fleet Management Plan (RFMP)
 - Bus Fleet Management Plan (BFMP)

⁴ Source: New Starts Project Planning and Development, Checklist of Project Sponsor Submittals to FTA To Enter Preliminary Engineering (PE). www.fta.dot.gov

- Safety & Security Management Plan (SSMP)
- Third Party Agreements and Permits (identified and scheduled).

The RAMP, RFMP, BFMP, SSMP and Third Party Agreements and Permits are typically submitted to FTA separately and supplement the PMP.

New Starts Templates, Certifications and Other Reports

The application to enter PE requires completion of the following additional documents:

- New Starts Criteria Templates and Certifications
- SCC Annualized Cost Worksheets
- Land Use Supporting Information
- Project Finance Plan and Supporting Information
- Making the Case Document.

Administrative Requirements

Administrative requirements of the New Starts application process includes:

- [Demonstration of] Legal Capacity – or the authority to undertake implementation of proposed transit mode
- Grantee Letter of Request for PE Initiation.

11.3 FTA Coordination

As previously stated, DDOT must submit a formal request to enter PE with the FTA. Documents required by the FTA as part of the applicable are listed in the previous section. DDOT will need to continue coordination with the FTA to ensure the latter's concurrence with approach and technical methodologies and assumptions employed throughout the entire process. In the short-term, DDOT will need to obtain FTA's concurrence on the Purpose and Need, Definition of Alternatives, Ridership Methodology and this documentation of the AA – a few of the required products that are part of the AA.