

APPENDIX A:
Federal Requirements Checklist



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1.0 FEDERAL REQUIREMENTS CHECKLIST

This checklist demonstrates how the 2026 Greater Helena MPO Long Range Transportation Plan (LRTP) complies with federal requirements for metropolitan transportation plans as set forth in 23 U.S.C. 134 and 23 CFR 450.324.

The metropolitan transportation planning process shall include the development of a transportation plan addressing no less than a 20-year planning horizon. [23 C.F.R. 450.324(a)]

The LRTP has a 20-plus-year planning horizon, ending in 2047.

The plan shall include both long-range and short-range strategies/actions that provide for the development of a safe, efficient, and integrated multimodal transportation system to address current and future transportation demand. [23 C.F.R. 450.324(b)]

The LRTP contains short-range (Committed) and long-range (Recommended) strategies/projects which are identified in the *Recommendations and Funding Technical Memorandum* and Chapter 5 of the consolidated LRTP document.

The MPO shall review and update the transportation plan at least every 4 years in air quality nonattainment and maintenance areas and at least every 5 years in attainment areas. [23 C.F.R. 450.324(c)]

The Greater Helena MPO was established after the 2020 Census showed that the Helena urban area's population had grown past 50,000 people. The 2026 LRTP is the Greater Helena MPO's first metropolitan transportation plan. The plan replaces the area's 2014 transportation plan, which was developed prior to creation of the MPO. The Greater Helena Area is considered an attainment area and therefore the MPO will review and update the LRTP at least every five years.

In metropolitan areas that are in nonattainment for ozone or carbon monoxide, the MPO shall coordinate development of the metropolitan transportation plan with the process for developing transportation control measures (TCMs) in a State Implementation Plan (SIP). [23 C.F.R. 450.324(d)]

The MPO is in attainment for ozone and carbon monoxide as discussed in the *Performance Management and Compliance Technical Memorandum*. Accordingly, TCMs are not applicable.





The MPO, the State(s), and the public transportation operator(s) shall validate data used in preparing other existing modal plans for providing input to the transportation plan. The plan shall use the latest available estimates and assumptions for population, land use, travel, employment, congestion, and economic activity. The Plan shall include current and projected transportation demand of persons and goods to the horizon year of the plan. [23 C.F.R. 450.324(e)]

The Greater Helena MPO, MDT, and Capital Transit validated and provided data used in preparing modal elements of the LRTP. The plan uses recent socioeconomic data and projects future demand through 2046, as discussed in the *Existing and Projected Conditions Technical Memorandum*.

The plan shall include existing and proposed multimodal transportation facilities that serve important national and regional transportation functions over the period of the transportation plan. [23 C.F.R. 450.324(f)(1-2)]

Existing transportation facilities (including motorized, non-motorized, transit, and other supporting facilities) are discussed in the *Existing and Projected Conditions Technical Memorandums*. The LRTP defines and focuses efforts on the major street network, which contains facilities that serve regional and national transportation needs.

Proposed transportation facilities are discussed in the *Recommendations and Funding Technical Memorandum*. The report details specific non-motorized transportation improvements, and all other proposed recommendations acknowledge multimodal needs. Capital Transit's *Transit Development Plan* (TDP) is being created alongside the LRTP to ensure the transit needs of the MPO are addressed.

Existing facilities are summarized in Chapter 2 of the consolidated LRTP while proposed facilities are summarized in Chapter 5.

The plan shall include a description of the performance measures and performance targets used in assessing the performance of the transportation system and a report on progress achieved in meeting the performance targets. [23 C.F.R. 450.324(f)(3) and 23 C.F.R. 450.324(f)(i)]

The MPO's performance measures, targets, and progress in meeting the identified targets are discussed in the *Performance Management and Compliance Technical Memorandum* and Chapter 6 of the consolidated LRTP.





The plan shall include operational and management strategies to improve the performance of existing transportation facilities to relieve congestion and maximize safety and mobility. [23 C.F.R. 450.324(f)(5)]

The MPO developed goals addressing operations, safety, and mobility of the multimodal transportation system, and the LRTP's recommended projects, programs, and policies were developed to advance those goals. These are discussed in the *Recommendations and Funding Technical Memorandum* and Chapter 5 of the consolidated LRTP document.

The plan shall include consideration of the results of the congestion management process in Transportation Management Areas (TMAs) that are nonattainment for ozone or carbon monoxide, including the identification of SOV projects. [23 C.F.R. 450.324(f)(6)]

The Greater Helena MPO does not oversee a TMA, as the Helena urbanized area's population falls below the 200,000-population threshold established under 23 U.S.C. 134(k)(3). The MPO therefore does not have a congestion management process, and this requirement is further inapplicable as the area has no history of ozone or CO nonattainment.

The plan shall include an assessment of capital investment and other strategies to preserve the existing and projected future transportation infrastructure, provide for multimodal capacity increases based on regional priorities and needs, and reduce the vulnerability of the existing transportation infrastructure to natural disasters. [23 C.F.R. 450.324(f)(7)]

The Plan identifies regional infrastructure priorities and provides capital investment recommendations and other strategies to address these priorities in the *Recommendations and Funding Technical Memorandum* and Chapter 5 of the consolidated LRTP document. The *Performance Management and Compliance Technical Memorandum* evaluates natural disaster mitigation needs.

The plan shall include transportation and transit enhancement activities, including consideration of the role that intercity buses may play in reducing congestion, pollution, and energy consumption. [23 C.F.R. 450.324(f)(8)]

Existing intracity and intercity transit services are discussed in the *Existing and Projected Conditions Technical Memorandum*. Capital Transit is conducting its own transit planning process through the ongoing *Transit Development Plan* (TDP) update, alongside its *Transit Asset Management* (TAM) plan, which establishes state of good repair targets for its capital assets. The Greater Helena MPO and Capital Transit continue to coordinate efforts to ensure consistency between the LRTP, TDP, and TAM plan.





The plan shall include a description of proposed transportation improvements in sufficient detail to develop cost estimates. [23 C.F.R. 450.324(f)(9)]

The *Recommendations and Funding Technical Memorandum* details proposed improvements and provides cost estimates for each.

The plan shall include a discussion of types of potential environmental mitigation activities and potential areas to carry out these activities. The discussion may focus on policies, programs, or strategies, rather than at the project level. [23 C.F.R. 450.324(f)(10)]

Environmental mitigation activities and potential areas to conduct them are discussed in the *Performance Management and Compliance Technical Memorandum*.

The MPO shall consult, as appropriate, with State and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning the development of the transportation plan. [23 C.F.R. 450.324(g)]

A list of Federal, State, and local agencies were included on the LRTP distribution list and made aware of all planning efforts. Agencies were included on distribution lists for updates throughout the LRTP planning process and were specifically contacted during the LRTP public and agency review period to gather feedback regarding possible environmental impacts and potential mitigation strategies (which are discussed in the *Performance Management and Compliance Technical Memorandum*).

The plan shall include a financial plan that demonstrates how the plan can be implemented and includes:
(a) Cooperatively developed estimates of costs and revenue sources reasonably expected to be available to adequately operate and maintain the highways and public transit (in "year of expenditure dollars")
(b) Recommendations on any additional financing strategies to fund projects and programs included in the plan.
[23 C.F.R. 450.324(f)(10-11)]

The financial plan is discussed in the *Recommendations and Funding Technical Memorandum* and Chapters 5 and 6 of the consolidated LRTP. The plan includes expected funding over the 20-year planning horizon, costs for future capital improvements and on-going maintenance activities in year of expenditure dollars, as well as discussion of currently available and potential future funding sources for transportation improvements.





The plan should include pedestrian walkway and bicycle transportation facilities. [23 C.F.R. 450.324(f)(12)]

Existing pedestrian and bicycle facilities are discussed in the *Existing and Projected Conditions Technical Memorandum*. The *Recommendations and Funding Technical Memorandum* includes a list of recommended non-motorized spot improvements to address critical barriers or gaps in the existing network. The non-motorized visionary network also includes proposed locations for sidewalks, bike lanes, shared use paths, etc., to enhance pedestrian and bicycle network connectivity. Chapter 5 of the consolidated LRTP summarizes these improvements as well.

The plan should integrate the priorities, goals, and strategies of the State's Highway Safety Plans and improvement programs, and public transportation agency safety plans. [23 C.F.R. 450.324(h)]

A detailed analysis of safety needs is provided in the *Existing and Projected Conditions Technical Memorandum* and the MPO's companion Comprehensive Safety Action Plan (CSAP). Strategies to address these needs were proposed in the CSAP and carried forward as appropriate to the LRTP. The MPO's progress towards the state's safety performance measures and strategies to support the state targets set in the *Comprehensive Highway Safety Plan* (CHSP) are discussed in the *Performance Management and Compliance Technical Memorandum*.

The MPO shall provide individuals, affected public agencies, representatives of public transportation providers and users, providers of freight transportation services, private providers of transportation, representatives of pedestrian and bicycle user groups, representatives of the disabled, and other interested parties with a reasonable opportunity to comment on the transportation plan. [23 C.F.R. 450.324(j)]

The Greater Helena MPO utilized the strategies outlined in its *Public Participation Plan* to engage the public and stakeholders in the planning process. Public input was used to help inform the plan as it developed. A description of the public involvement activities and participation is contained in Chapter 1 of the consolidated LRTP. The public, stakeholders, affected public agencies, and other interested parties were included on email distribution lists to help spread awareness and increase engagement. The consolidated LRTP will be available for a formal 30-day minimum public and agency review.

The plan shall be made readily available for public review in electronically accessible formats. [23 C.F.R. 450.324(k)]

All published plan documents are available for public review on the LRTP homepage of the Greater Helena MPO website (greaterhelenampo.org/LRTP). The public and stakeholders were alerted of published documents via email and other media. Alternative formats were also made available upon request.





In nonattainment and maintenance areas for transportation-related pollutants, the MPO, as well as the FHWA and the FTA, must make a conformity determination on any updated or amended transportation plan in accordance with the Clean Air Act and the EPA transportation conformity regulations. [23 C.F.R. 450.324(m)]

The *Performance Management and Compliance Technical Memorandum* indicates that the transportation conformity requirements are not applicable to the Greater Helena area's LRTP or TIP since the Greater Helena Area is considered in attainment with all transportation-related pollutants.

