

KATS Administrative Policies & Procedures

For the Transportation Improvement Program
and Metropolitan Transportation Plan



Kalamazoo Area Transportation Study
5220 Lovers Lane, Suite 110
Portage, MI 49002
(269) 343-0766

info@KATSmpo.org
www.KATSmpo.org

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Introduction

This document provides policies and procedures to administer the Kalamazoo Area Transportation Study's (KATS) Transportation Improvement Program (TIP) and Metropolitan Transportation Plan (MTP). It highlights the differences between minor revisions and significant revisions, while defining various long standing administrative policies. The guidance outlines steps for modifying the TIP document when such changes occur as well as actions needed by Kalamazoo Area Transportation Study Technical Committee and Policy Committee, the Kalamazoo Area Transportation Study staff, the Michigan Department of Transportation, the Federal Highway Administration, and the Federal Transit Administration.

Regardless of the type of change to the TIP or MTP, all modifications must be consistent with the financial constraint requirements, Federal Title VI requirements, and the KATS Public Participation Plan procedures.

Transportation Performance Measures (TPM)

KATS will monitor progress toward all TPM targets (either in support of statewide targets or individual MPO targets if applicable). The reporting of progress will be consistent with the procedures and documentation developed in consultation with the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), the Michigan Department of Transportation (MDOT), and the Michigan Transportation Planning Association (MTPA). If progress is not being made toward the targets, the MPO investment strategies in each category will be reviewed for those areas within MPO control.

The current MPO project prioritization process supports the federal Transportation Performance Measures. To the extent of the MPO's ability, the MPO will assess the Transportation Performance Measures for progress towards the adopted targets. The MPO will then review its Prioritization Process and adjust the Process accordingly.

Definition and Use of General Program Accounts (GPAs)

Federal regulation 23 CFR 450.324 (f) states projects that are not considered to be of appropriate scale for individual identification in a given program year may be grouped by function, work type, and/or geographic area using the applicable classifications under 23 CFR 771.117(c) and (d) and/or 40 CFR part 93. In nonattainment and maintenance areas, project classifications must be consistent with the "exempt project" classifications contained in the EPA transportation conformity regulation (40 CFR part 93). In addition, projects proposed for funding under title 23 U.S.C. Chapter 2 that are not regionally significant may be grouped in one line item or identified individually in the TIP.

In Michigan, these groupings of projects are called General Program Accounts (GPAs). A project consists of all the job numbers and phases for proposed work that are included in the associated environmental documents. Projects that have similar work type activities can be grouped together in a GPA based on that work type activity and included in the state's metropolitan area TIPs and/or the State Transportation Improvement Program (STIP) for non- metropolitan areas. Trunkline Project lists for each individual GPA are maintained by MDOT through the Jobnet system.

In an effort to streamline TIP and State TIP (STIP) development processes and minimize the need to amend the TIP and STIP, a statewide committee was developed to review current definitions for General

Program Accounts. The committee worked to clearly define the General Program Account categories and to find ways to make more efficient use of them for eligible state, local and transit projects. The Michigan Department of Transportation (MDOT) Statewide Transportation Planning Division worked with the Metropolitan Planning Organizations (MPOs), the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA) and others within MDOT to review the current use of GPAs and their definitions.

Advantages of Using Groupings:

GPAs may be used as a tool to streamline the TIP and STIP development processes and minimize the need to amend the TIP and STIP. Grouping projects in GPAs is a tool to reduce the record keeping requirements of individually listing minor projects. They reduce the volume of projects listed individually on the TIP and STIP E-files. The line item GPA, while it encompasses several small-scale projects, is treated as one project for the purposes of amendment/administrative modifications to the TIP and STIP. This allows for more flexible programming of the TIP and STIP and a reduction in the number of amendments.

Terminology:

General Program Account (GPA) – Project groupings, into which the individual GPA Projects will be sorted, based on the work type code.

GPA Project – this is the individual phase that will be assigned to the appropriate GPA.

The following baseline rules have been adopted by the Michigan Transportation Planning Association:

1. The project cannot be a new road, capacity expansion, or capacity reduction (road diet) project.
2. The project cannot be funded with a congressional or state earmark.
3. The project cannot be experimental.
4. Each project must be a categorical exclusion and air quality neutral.
5. Reconstruction projects are not GPA eligible.
6. GPA Projects shall cost less than \$5.0 Million in total.

KATS General Program Account Policies

KATS may use General Program Accounts as the process is further refined in the Jobnet environment. As progress is made in Jobnet, KATS will discuss a GPA Implementation process with local units of government and MDOT. Until that time, the FY 20-23 TIP does not use GPAs.

Programming New or Revised Projects to the Transportation Improvement Program (TIP)

There are three defined actions allowable to make changes to Transportation Improvement Program projects: MPO Administrative Modifications, MPO Adjustments, and Federal Amendments.

Administrative Modification (23 CFR 450.104)

1. Minor change in cost (increase or decrease less than 25% of the total project phase cost);
2. Minor change in funding source (moving from one federal funding source to another federal funding source, except Congestion Mitigation and Air Quality (CMAQ) funding);
3. Shifting projects/phases between fiscal years of the current STIP while maintaining financial constraint defined as “project selection” in the regulations (23 CFR 450.222 and 23 CFR 450.332);
4. Switching a project/phase from regular federal-aid to Advance Construction and vice versa (per Michigan Division and MDOT finance agreement provided the change is noted in the request sent to FHWA at the time of project/phase authorization);
5. Addition of a project/phase that uses 100% State or local funding, unless it is deemed “regionally significant” by the MPO;
6. Changes in non-federal project/phase costs;
7. Addition of a project/phase for emergency repairs to roads or bridges**;
8. Addition, deletion, and scope changes to projects/phases within General Program Accounts (GPAs);*** and
9. Technical corrections – corrections to typos, misspellings, and other data entry errors.

**Emergency relief projects may (but are not required to) be included in the STIP, except those involving substantial functional, location, or capacity changes per 23 CFR 450.218(g)(5).

***May require a Federal amendment for transit projects in urbanized areas if FTA program of projects public participation requirements have not been met.

Administrative Modifications do not require Federal approval. However, all information regarding Administrative Modifications is made available to the public, MDOT, FHWA, and FTA. FHWA and FTA reserve the right to disallow an administrative modification that is not consistent with Federal regulations.

MPO Adjustment

1. A project change that falls outside the MPO Staff’s authority (Administrative Modification Policy), but does not require a Federal Amendment.
2. Option for the MPO within Jobnet to approve a project through their Committee structure, but not submit to FHWA/FTA for approval.

Federal Amendment (20 CFR 450.104)

1. Any project or project phase change that affects air quality conformity or requires a conformity determination (in nonattainment and maintenance areas) regardless of the cost of the project or the funding source;

2. A project or project phase change that requires public review and comment and/or the re-demonstration of fiscal constraint;
3. The addition of a new project/phase or moving a project/phase from the illustrative list to the financially constrained list;
4. The deletion a project/phase or moving a project/phase to the illustrative list;
5. Major change in project phase cost (increase or decrease greater than 25% of the total phase cost);
6. Changing a non-Federally funded project/phase to a federally funded project/phase (except when switching a project from regular federal-aid project to an Advance Construction project or vice versa); and
7. Major change in project/phase design concept or design scope defined as:
 - A change resulting in an air quality conformity reevaluation (per Interagency Work Group determination).
 - Significant change to work type or project/phase description.
 - Significant change in limits – Increase/decrease a project phase length by a ½ mile or more.
 - Addition/increase/decrease of a travel lane by ½ mile or more.
 - Addition of new project items (sidewalk, bike lane, ADA enhancements) that are a ½ mile or more in length.

While maintaining fiscal constraint, the action requested is:	MPO Administrative Modification	Requires Committee Approval	
		MPO Adjustment	Federal Amendment
ADDITION			
To add a federally funded project to the current TIP			
To add a project to the Illustrative List			
To add a project Phase to the current TIP			
To add a project Phase to the existing project in Illustrative List			
DELETION/SUSPEND/ABANDON PROJECT			
To delete/suspend/abandon a federally funded project in the current TIP			
To delete/suspend/abandon a project from the illustrative list			

While maintaining fiscal constraint, the action requested is:	MPO Administrative Modification	Requires Committee Approval	
		MPO Adjustment	Federal Amendment
To move a federally funded project to another year WITHIN the current TIP			
To move a federally funded project to another year OUTSIDE the current TIP (delete)			
To move an Illustrative project to the Current TIP			
To move a federally funded project to the Illustrative List (delete)			
SCOPE CHANGES			
To increase/decrease a project length by 1/2 mile or greater (less than will be an Administrative Modification)			
To increase/decrease a travel lane by 1/2 mile or greater (less than will be an Administrative Modification)			
Addition of new project items (sidewalk, bike lanes, signals) that are a 1/2 mile or greater in length (less than will be an Administrative Modification)			
AIR QUALITY CONFORMITY			
Project has an effect on air quality conformity (IAWG rules)			
FUNDING			
To increase/decrease more than 25% of total phase cost (less than will be an Administrative Modification) of TIP line item			
To assign/remove Advance Construction funding to a federal funded project			
To assign federal funds to a locally funded project (add)			
To change federal fund source (except CMAQ funding)			
Changes in non-federal (non-participating) project/phase cost			

While maintaining fiscal constraint, the action requested is:	MPO Administrative Modification	Requires Committee Approval	
		MPO Adjustment	Federal Amendment
Addition, deletion, and scope changes to projects/phases within a GPA			
To increase/decrease GPA Threshold to match project cost (less than 25% change)			
CORRECTIONS			
Technical Corrections- corrections in typos, misspellings, and other data entry errors			
REGIONALLY SIGNIFICANT PROJECTS			
Project is determined to be regionally significant by MPO			

Amending the Metropolitan Transportation Plan (MTP)

MTP Amendments require the review and recommendation of the Technical Committee and approval of the Policy Committee as well as state and federal approval, and are characterized by one of the following proposed changes (see corresponding MTP Revisions matrix):

- Adding a new regionally significant project, as defined by inter-agency work group (IAWG) and/or air quality (AQ) conformity Non-Exempt project list. *See the definition of regionally significant projects below for more detail.
- Deleting a project; where applicable, funding will be returned to the MPO for reprogramming.
- Projects with cost exceeding 25% of the MTP programmed Federal-aid amount.
- Major changes in project design concept or design scope. A major change is one affecting roadway capacity and/or air quality.
- Moving an Illustrative List project into the body or project list of the MTP document.
- Changing non-federally funded project to federally funded project.
- Changing air quality conformity model year grouping for a regionally significant project.

Existing MPO, State and Federal processes will be followed for proposed MTP Amendments in the areas of air quality conformity, financial constraint, public participation, and environmental justice. MTP amendments will be subject to public involvement as described in the MPO Public Participation Plan.

Major projects affecting roadway through capacity or transit service capacity (Non-Exempt for

AQ) shall be listed specifically in the MTP, and subject to a MTP amendment if not in the plan. AQ Exempt projects are not required to be listed individually, outside of those in the current TIP, but may be listed by categories of work (such as preservation, safety, etc.)

At all times the MTP must maintain financial constraint through a combination of Federal and non-federal funds. Approved MTP amendments will be forwarded to MDOT with updated project lists, financial constraint documentation, and proof of MPO action. MDOT will then forward the changes to FHWA.

KATS MTP Administrative Modifications

Administrative modifications will be considered when any of the following is proposed to an existing project in the MTP:

- Adding thru lanes or non-motorized facilities, up to one mile, or as defined by the IAWG.
- Increase or decrease in less than or equal to 25% of the MTP programmed amount.
- Change in Non Federal-aid project cost.
- Change in Federal or Non Federal funding category.
- Corrections to minor listing errors or other non-regionally significant project changes.
- Minor changes in scope, or scope changes not considered regionally significant.
- Update to the first four-years of the MTP to correspond to the most current TIP. The first four years of the MTP are the TIP and vice versa. When the MTP is updated or amended, the first four years will be adjusted to match the latest version of the TIP, including all TIP amendments and modifications to-date.

Administrative modifications regarding the addition of lanes or non-motorized facilities up to one mile and increases in Federal-aid project cost up to 25% require MPO Committee approval. The other minor modifications to the MTP occur only when the MTP itself is undergoing an update or is being amended. The MTP document is visionary and long range by its very nature and is only administratively modified when other major changes (amendments) are demanded.

At all times the MTP must maintain financial constraint through a combination of Federal and non-federal funds. Administrative modifications will be communicated to MDOT and FHWA during the next MTP amendment or plan update, and for public information in accordance with the KATS Public Participation Plan.

Regionally Significant Projects

A transportation project that is on a facility which serves regional transportation needs and would normally be included in the modeling of the metropolitan area's transportation network. A transportation project (other than projects that may be grouped in the TIP and/or STIP or exempt projects as defined in EPA's transportation conformity regulation (40 CFR part 93)) that is on a facility which serves regional transportation needs (such as access to and from the area outside the region; major activity centers in the region; major planned developments such as new retail malls, sports complexes, or employment centers; or transportation terminals) and would normally be included in the

modeling of the metropolitan area's transportation network. At a minimum, this includes all principal arterial highways and all fixed guideway transit facilities that offer a significant alternative to regional highway travel. (23 CFR 450.104)

KATS Definition of Regionally Significant Projects

Project is considered Regionally Significant if:

- M-funded/locally-funded project greater than \$250,000.
- Project is on the NHS and significantly impacts traffic.

If the project is within a maintenance category (crack seal, painting, micro seals), and does not significantly impact traffic, the project is not deemed Regionally Significant.

KATS reserves the right to discuss in committee any project that may satisfy these requirements, but may be sensitive in nature, to make a determination on Regional Significance.

KATS Active Membership

It is understood that agencies should be active voting members of the KATS Policy Committee to receive federal dollars through the MPO Planning Process.

KATS Federal Funding of Right of Way (ROW)

Use of federal funds for the purchase of ROW for local projects is not allowed unless the committee deems a corridor with a high priority a special case as identified and approved by the KATS Policy Committee.

KATS Federal Funding of Engineering Expenses

Use of federal funds for local project design engineering cost is not allowed.

KATS Asset Management Principles

It is understood with all agencies that proper asset management principles will govern the maintenance of the federal aid system. Through the TIP Call for Projects, KATS emphasizes the “right fix at the right time” and will not consider funding projects that have not met a reasonable life expectancy for the previous fix applied.

Inter-agency Work Group (IAWG) and Air Quality Conformity

All capacity and operational changes, regardless of funding, need to be discussed with KATS and the IAWG so an Air Quality determination (Exempt or Non-exempt) can be made. Air Quality Non-exempt projects must be tested and show conformity prior to construction.

Agencies that bypass the KATS planning process, cannot demonstrate the ability to handle current and future traffic volumes, regardless of funding source, will risk their eligibility to receive federal funding through the MPO planning process.

Public Engagement

KATS conducts public engagement activities through the process outlined within the KATS Public Participation Plan. It is the KATS intent through the planning process that local agencies demonstrate their own public engagement outreach prior to any approval of the project through the KATS planning process.

Documentation may be submitted via the KATS Call for Projects process or, for non-KATS awarded projects (Transportation Alternative Program, Bridge, and Safety), documentation should be presented with the request for a TIP amendment.