



The Metropolitan Planning Organization for the Greater Kalamazoo Area

5220 Lovers Lane, Suite 110

Portage, MI 49002

☎ 269-343-0766

✉ info@KATSmpo.org

TO: Kalamazoo Area Transportation Study Technical Committee
FROM: Steve Stepek, AICP, Executive Director
DATE: June 11, 2020
SUBJECT: TECHNICAL COMMITTEE MEETING
THURSDAY, JUNE 11, 2020 - 9:00 A.M.
REMOTE

The Kalamazoo Area Transportation Study Technical Committee will be meeting on Thursday, June 11, 2020 at 9:00 a.m. The following materials are included in your meeting packet:

1. Agenda for the June 11, 2020 Meeting
2. Draft Minutes of the May 14, 2020 Meeting
3. Federal Highway Administration Cost Based Amendment Proposal
4. KATS Comment Letter on Cost Based Amendment Proposal

Please provide a **written status report** for your agency regarding road and/or planning updates.

Please remember that time sheets are due by the 15th of each month.

KALAMAZOO AREA TRANSPORTATION STUDY

TECHNICAL COMMITTEE MEETING
JUNE 11, 2020 - 9:00 A.M.

REMOTE DIAL IN

Dial-in Number: 1-947-207-1273
Conference ID: 638 648 874#

AGENDA

Please limit public comments to 4 minutes.

1. CALL TO ORDER
2. ROLL CALL (Sign-in Sheet Circulated)
3. CHANGES OR ADDITIONS TO THE AGENDA
4. APPROVAL OF THE AGENDA (**ACTION**)
5. MINUTES FROM THE MAY 14, 2020 MEETING (**ENCLOSURE**) (**ACTION**)
6. POLICY COMMITTEE REPORT
7. PUBLIC COMMENTS (Non-agenda Items)
8. FEDERAL HIGHWAY ADMINISTRATION COST BASED AMENDMENT DISCUSSION (**ENCLOSURE**)
9. PUBLIC TRANSPORTATION UPDATES
10. STATUS REPORTS
 - a. ROADS - Questions on written status reports. Verbal reports will be limited to 4 minutes per agency.
 - b. LAND USE/PLANNING AND ZONING - Questions on written status reports. Verbal reports will be limited to 4 minutes per agency.
11. NEW BUSINESS
12. PUBLIC COMMENTS
13. ADJOURNMENT

The next meeting of the Kalamazoo Area Transportation Study Technical Committee will be held on Thursday, July 9, 2020 at 9:00 a.m.

KALAMAZOO AREA TRANSPORTATION STUDY

TECHNICAL COMMITTEE MEETING
DRAFT MINUTES MAY 14, 2020 - 9:00 A.M.

CALL TO ORDER

The May 14, 2020 Technical Committee Meeting was called to order remotely at 9:00 a.m. by Chair Kathy Schultz.

ROLL CALL

Remote meeting attendance was recorded on the sign-in sheet.

MEMBERS PRESENT

Barry Anttila	Van Buren County Road Commission
Muhammad Arif	City of Portage
Mickey Bittner	Village of Paw Paw
Tony Dacoba	Van Buren Public Transit
Jeff Franklin	Michigan Department of Transportation, Statewide Planning
Kendra Gwin	City of Portage
Jamie Harmon	City of Portage
Jim Hoekstra	Road Commission of Kalamazoo County
Lisa Imus	Village of Lawton
Lotta Jarnefelt	Kalamazoo County
Julie Johnston	Texas Township
Anthony Ladd	City of Kalamazoo
Jim Mallery	Village of Vicksburg
Ryan Minkus, Vice-Chair	Road Commission of Kalamazoo County
Jesse Okeley	City of Kalamazoo
Michelle O'Neill	Michigan Department of Transportation, TSC
Katie Reilly	City of Kalamazoo
Brian Sanada	Michigan Department of Transportation, Region
Kathy Schultz, Chair	Central County Transportation Authority
Joe Stark	City of Kalamazoo
Jodi Stefforia	Comstock Township
Nancy Stoddard	City of Parchment
Greg Vliestra	Kalamazoo County Transportation Authority
Mike West	City of Portage
Tim Woodhams	Village of Mattawan
Mark Worden	Road Commission of Kalamazoo County

OTHERS PRESENT

Lawrence Hummel	Hubbell, Roth and Clark, Inc.
Megan Mickelson	Kalamazoo Area Transportation Study
Jesse Morgan	Hubbell, Roth and Clark, Inc.
Fred Nagler	Kalamazoo Area Transportation Study
Elizabeth Rumick	Kalamazoo Area Transportation Study
Hailey Savola	Hubbell, Roth and Clark, Inc.
Steve Stepek	Kalamazoo Area Transportation Study

CHANGES OR ADDITIONS TO THE AGENDA

No changes or additions to the agenda were made.

APPROVAL OF THE AGENDA

MOTION by Minkus, SECOND by Vlietstra, ***“to approve the May 14, 2020 Technical Committee Agenda.”*** MOTION APPROVED.

MINUTES FROM THE MARCH 12, 2020 MEETING

MOTION by Jarnefelt, SECOND by O'Neill, ***“to approve the minutes from the March 12, 2020 Technical Committee Meeting.”*** MOTION APPROVED.

POLICY COMMITTEE REPORT

Stepek reported the Kalamazoo Area Transportation Study Policy Committee April meeting was cancelled but they met remotely by phone in March. Recommendation for Steven Stepek as new Executive Director replacing retiring Jonathan Start was approved. Start's last day was May 6, 2020. A retirement celebration will be held in the future. All action items recommended were adopted by the Policy Committee. Schultz congratulated Stepek on becoming Executive Director while reminiscing about working with Start and wishing him well.

PUBLIC COMMENTS

No public comments were made.

KATS CONSULTATION PLAN

Referring to the Consultation Plan included in meeting materials, Stepek explained the Plan was developed following recommendation from the recent Kalamazoo Area Transportation Study (KATS) Certification Review. The Consultation Plan outlines methods during the planning process to engage consultation organizations separate and distinct from general public involvement. The draft plan has been out for comment/review and is now presented for approval. Mickelson noted feedback from the Citizens Advisory Committee was incorporated into the draft. The Consultation Plan will go into KATS long-range plan which will be presented for adoption next year. Minkus inquired whether there could be recommendations to add additional groups or businesses. Stepek responded the consultation contact list is in the appendix of the document so it can be continuously updated. Minkus inquired if The Parks Foundation of Kalamazoo County could be added. It was agreed that would be a good organization to add. Minkus inquired if KATS had considered schools. Stepek commented school districts are included in general public outreach whereas the consultation list is an advocacy subset group.

MOTION by Minkus, SECOND by Sanada, ***“to approve the KATS Consultation Plan.”*** MOTION APPROVED.

FY 20-23 TRANSPORTATION IMPROVEMENT PROGRAM AMENDMENTS

Included in the meeting materials, Stepek stated most of this month's amendments are transit related including corrections for FY19 and 20 and additions for traffic safety grants. The other two amendments are Michigan Department of Transportation projects for US-131 concrete repair and M-139 traffic safety.

MOTION by Minkus, SECOND by O'Neill, ***“to approve the FY 20-23 Transportation Improvement Program Amendments.”*** MOTION APPROVED.

FY 2021 UNIFIED PLANNING WORK PROGRAM

Schultz stated the FY 2021 Unified Planning Work Program was enclosed in the meeting packet. Stepek reported the work program is Kalamazoo Area Transportation Study's fiscal year 2021 work items and budget. The program has no major changes but shifts in priority areas. It includes a continuation of Kalamazoo Area Transportation Study (KATS) long-range-plan and extra funds for the continuation of the Travel Demand Model development and continued pass-thru agreement with

Metro for transit planning software. It also includes contract continuation for FY 2021 with South Central Michigan Planning Council where there is interest to extend the arrangement for the next three years aligning with KATS Master Agreement. The FY2021 Unified Planning Work Program has been posted on the website for over a month. Schultz asked if Metropolitan Planning Organizations (MPOs) have been notified of any budget reductions. Stepek responded KATS and all MPOs operate on a year lag so our fiscal 2021 is our 2020 obligation. Therefore, KATS fiscal 2022 budget may have possible financial implications. Schultz asked if the budget includes hiring a full-time planner to fill the vacancy in light of recent KATS staff changes. Stepek responded the new hire expense is reflected in the budget. The Planner application process is on the KATS webpage. Applications will be accepted through the end of May.

MOTION by Franklin, SECOND by Arif, ***“to approve the FY 2021 Unified Planning Work Program.”*** MOTION APPROVED.

HIGHWAY INFRASTRUCTURE PROGRAM

Similar to last fiscal year, Stepek reported Kalamazoo Area Transportation Study (KATS) received an additional allotment of highway infrastructure funding. KATS is reviewing the Illustrative Project list to determine what project best fits the funding of approximately 245 thousand dollars. KATS is working with Road Commission of Kalamazoo County in consideration of G Avenue work. The project will be added to fiscal 2021 for funding and will be presented in next month's Transportation Improvement Program Amendments.

FY 20-23 ILLUSTRATIVE PROJECT LIST

Schultz noted the FY 20-23 Illustrative Project List was included in meeting materials. Due to anticipated federal infrastructure stimulus, Stepek requested attendees review the list to ensure all listed projects are feasible and not already funded with local dollars whereby they would be taken off the list. Kalamazoo Area Transportation Study is not adding any projects but needs to know of any minor changes or if projects are funded locally so would not be considered. Stoddard noted City of Parchment repaving project of Riverview Drive from Mosel to Parchmount should state East G Avenue to East Oak Grove Avenue. Stepek will make the revision. Stoddard will submit new financial information.

CONTRIBUTED SERVICES YEAR TO DATE

Stepek referred to the Contributed Service Summary for fiscal Year to Date (YTD) April 2020 included in meeting materials. This is a reminder to fill out and send in time sheets to Kalamazoo Area Transportation Study to fulfill the signed agency agreement. Some agencies are doing better than others. Possible increased field work and engineering due to people working from home right now are eligible activities.

TRAFFIC COUNT PROGRAM LISTS

Stepek requested agencies submit traffic count program lists as soon as possible to Kalamazoo Area Transportation Study. The list should include at least a minimum of traffic counts planned for the year, understanding that counts are impacted by COVID-19. Largest participants include Road Commission of Kalamazoo County, City of Kalamazoo and City of Portage. Stepek will remit lists to the traffic consultant Brian Burly of Traffic Tech Services, LLC. Hoekstra pointed out the reduced schedule due to COVID-19. Stepek will set up a separate meeting next week on the traffic counts.

PUBLIC TRANSPORTATION UPDATES

Dacoba reported Van Buren Public Transit has been practicing all COVID-19 suggested practices with extensive cleaning. Ridership is down about 50 percent. Van Buren Public Transit allows only one person on a bus at a time unless more than one person is coming out of the same house. Face shield, covering or mask is required.

Schultz reported Metro Transit has not operated the fixed route system since April 2, 2020. Metro Connect has been providing rides seven days a week for essential purposes, including life sustaining transportation, medical and essential work force staff, grocery and pharmacy trips. About 200 rides a day are being provided with about 50 percent of those being passengers that regularly take the fixed route system. Metro Connect is doing well keeping up with demand and addressing issues of what is deemed essential and vital. Limited fixed route service will begin Monday May 18, 2020 at 6:00 a.m. for seventeen routes. Buses will run hourly, like a Sunday schedule, except for three routes that will have additional busses. Service ends at 6:15 p.m. which is earlier than a normal schedule. Passengers are required to have a face covering which can even be a scarf or a bandana. Hand sanitizer has been installed on the rear door. Buses have rear door access only. Fare is free to eliminate interaction with the fare box and driver. Allowable bus seats will be marked for social distancing. Metro practices daily sanitizing of all buses including aerosol bomb deep cleaning and disinfecting. Maintenance Manager Rob Branch has done a superior job getting coaches ready and has worked with Mulder Construction in Kalamazoo to install floor to ceiling plexiglass shields for drivers. New signs address the face covering requirement, social distancing and sanitizing guidelines. Most drivers have been brought back to work, stressing the service is for essential trips only. Once a coach is full, drivers place a "FULL" header on the bus and stop to tell additional passengers via radio they will have to wait for the next bus. Similar transit practices are being performed in Grand Rapids, Ann Arbor and Lansing. Metro welcomes feedback from the community and will continually review, adjust and update services. In conjunction with Kalamazoo County, Metro transported COVID positive individuals to Battle Creek as well as Kalamazoo shelters. Metro is thankful for its receipt of 9 million dollars from the federal CARES Act. As a result, no one has been laid off and drivers and staff are still getting paid. Dacoba invited attendees to see plexiglass installed as office barriers by Mulder and Portage Glass. Schultz mentioned Metro's front door was remodeled as a glass enclosure requiring people to buzz-in, for social distancing needs. Metro Transportation Center continues to be closed to the public. All Amtrak train, Greyhound and Indian Trail bus service is limited. Dacoba expressed interest in Metro's bus barriers and arranged to view them. Schultz added Metro Connect is being retrofitted with plexiglass barriers. Metro staff has been working with the City of Kalamazoo on upgrading 23 bus stops as part of the HUD funding provided through Community Development and will be working on sign upgrades for East Main and West Main this spring. Stops are also being upgraded as part of construction projects this summer.

STATUS REPORTS

ROADS-

Schultz stated Metro is researching single lane closures where bus stops cannot be accessed for service beginning Monday May 18, 2020.

Harmon reported City of Portage South Westnedge Avenue and Shaver Road – West Centre Avenue to Romence Road project began April 27, 2020 with the construction of water main across West Centre Avenue on the east side of Shaver Road and across Shaver Road on the north side of the intersection. Road closures with detours were completed. Lane closures will continue on Shaver Road and South Westnedge Avenue for the rest of the project with completion by August 17, 2020. Project includes water main and storm sewer replacement, new mast arm and traffic signal upgrades, ADA ramps, driveway closures and pavement replacement. The contractor is Michigan Paving and Materials. The South Westnedge Avenue project from Trade Center Way to Kilgore Road began Monday May 11, 2020 with completion by July 11, 2020. Project includes minor median improvements, ADA ramps, driveway closures and pavement replacement. The project has TIP and TEDF Category F funding and the contractor is Michigan Paving and Materials. The East Centre Avenue project from Portage Road to Sprinkle Road construction will begin Monday May 18, 2020 with anticipated completion July 2, 2020. Project includes pedestrian push button improvements at Portage Road and, the extension of a left turn pocket at Stryker's driveway entrance. The contractor is Kalin Construction. The Zylman Avenue reconstruction project is wrapping up with final paving and pavement markings this week. Final landscaping, irrigation and restoration will follow with completion by May 30, 2020. Design on the East Milham Avenue project from South Westnedge Avenue to

Portage Road continues with Grade Inspection submittal planned for June 2020. Project includes water main replacement from South Westnedge Avenue to Concord Street, traffic signal replacement at Newport Road, extension of fiber network and traffic signal interconnect, ADA ramps, landscaping and pavement replacement. The project has TIP and CMAQ funding and construction will begin spring of 2021.

O'Neill reported Michigan Department of Transportation (MDOT) lighting installation along the Westnedge/I-94 interchange ramps that was ongoing over the winter is nearly complete. Construction of the emergency pull off locations on I-94 is complete. Construction of the US-131 and KL Avenue/Amtrak bridge resurfacing and maintenance work is substantially complete. MDOT has added a small maintenance funded paving project on M-89 in Richland from the traffic light in town to the east village limits. This work is tentatively scheduled for the week of August 10, 2020 weather permitting. This project will be in the June letting. The I-94 "pre-work" project in preparation for the widening between Lovers Lane and Sprinkle is scheduled to begin in late May. MDOT is waiting for the contract to be awarded.

Road Commission of Kalamazoo County Non-motorized:

FY	Job No.	Description	Status
2019	202047	Drake Rd Trail – Green Meadow to W. Main.	Wrapping up.
2020	127385	Drake Rd Trail – KL Ave to Green Meadow	04/30/20 precon, 06/15/20 tentative start.
2020	205109	KRVT #6 – 35 th St to McCollum	Starting week of 05/04/20.
2020	206301	Stadium Dr Sidewalk – Quail Run to 11 th St.	Waiting for MDOT confirmation of letting date.

Road Commission of Kalamazoo County Road Updates:

FY	Job No.	Description	Status
2019	120246	D Ave – Rolling Meadows to Douglas D Ave – 17 th St. to Riverview Dr.	Wrapping up.
2019	202857	8 th St. – S Ave. to R Ave.	06/15/20 tentative start.
2020	202433	Local Bridge Program (29 th St, 35 th St, 9 th St, Portage Rd) Preventive Maintenance	06/15/20 tentative start.
2020	130824	Drake Rd. – Parkview to W. Main	Underway with signal work.
2020	207248	S Ave. – 34 th to 36 th St.	06/15/20 tentative start.
2020	130143	U Ave. – 29 th St. to 32 nd St.	HMA weeks of 05/04 and 05/11.
2020	207188	Systemic Signs	Underway.
2020	207249	G Ave. – 2 nd St. to 6 th St.	05/2020 Letting.
2021	206265	Sprinkle Rd. – Milham to N Ave.	Preliminary plan development

RCKC Other Updates:

- Project information meetings happening virtually. Townships were sent notification. Information available on the "Projects" page of the RCKC website.

Johnston reported Bronson Healthcare Group submitted plans to Texas Township for a 780-foot extension of Beatrice Drive east of South 9th Street. The City of Kalamazoo is building a water main down O Avenue to support the 6th Street water tower. Kalamazoo Valley Community College is building a new road from their large cul-de-sac to O Avenue.

LAND USE/PLANNING AND ZONING-

Jarnefelt reported Kalamazoo County will be sending letters to agencies within a week or so regarding the planned 2021 Pictometry flight.

Reilly reported the Imagine Winchell Neighborhood Plan was presented to the Planning Commission at the May 7, 2020 meeting. The first reading for zoning amendments related to Adult Use Marihuana occurred at the May 4, 2020 City Commission Meeting.

Johnston reported Prein and Newhof is developing a Capital Improvement Project for Texas Township as part of SAW. Anticipated completion is in the fall.

NEW BUSINESS

Minkus asked if Kalamazoo Area Transportation Study (KATS) is still looking for participants for the Non-Motorized sub-committee. Stepek responded all sub-committee meetings have been on hold due to COVID-19 but KATS is still looking for volunteers for the Non-Motorized sub-committee related to development of the long-range plan. Subcommittee participation will hopefully be resumed and solicited in June 2020.

O'Neill stated Southwest Region Michigan Department of Transportation and Kalamazoo staff expressed apprehension with PASER ratings this year and the statewide Transportation Asset Management Council Committee decision not to cancel them. Nagler noted that it is up to local agencies and participants as to whether and how to get ratings done since they were not cancelled. Nagler will email seeking feedback on whether agencies are comfortable performing ratings and suggestions to keep participants protected. It is best to do as many ratings as possible this fiscal year to minimize any loss of funding which would not be received next year. KATS staff will discuss non-federal aid rating processes.

PUBLIC COMMENTS

No public comments were made.

ADJOURNMENT

There being no other business, the May 14, 2020 Technical Committee Meeting was adjourned at 9:44 a.m.

The next meeting of the Kalamazoo Area Transportation Study Technical Committee will be held on Thursday, June 11, 2020 at 9:00 a.m. at Metro, 530 N Rose St.

April 8, 2020

Cost-based STIP/TIP amendments for highway projects in Michigan

The focus of this paper is to propose modifications to what triggers cost-based TIP and STIP amendments for highway projects in Michigan. The goal is to have the appropriate magnitude of cost changes trigger the amendment process.

Background

Changes to the State Transportation Improvement Program (STIP) and MPO Transportation Improvement Programs (TIPs) come in two varieties: amendments and administrative modifications. Amendments are those changes which are of a more significant scale than administrative modifications. The amendment process is triggered by a variety of changes to the STIP/TIP such as the addition or deletion of a phase, and changes in cost, schedule, or scope. See Appendix 1 for related definitions from the Code of Federal Regulations.

The amendment process requires additional time to complete in comparison to administrative modifications. However, this additional time serves an important purpose for the right projects, with an opportunity for public involvement, discussion by MPO and rural committee members, and verification of fiscal constraint. The quantity of amendments varies over the course of the year in Michigan, with an average month having one hundred to two hundred phases being amended (see Appendix 2).

Currently, cost-based amendments to the STIP and TIPs in Michigan are defined as +/- 25% of the Total Phase Cost; examples of a phase include right-of-way and construction. The advantage of a single percent change trigger is that it is simple and easy to remember. However, this also means that it is not sensitive to the cost magnitude - a small cost change on a small phase cost triggers the amendment process, while large changes on a large phase cost may not trigger the amendment process.

Proposal

Revisiting the cost component of TIP amendments provides the opportunity to improve upon capturing what defines a major change in cost. These are the changes which would be of interest to the public, MPO committee members, MDOT, and/or FHWA. ***The goal is to have the appropriate magnitude of cost changes trigger the amendment process.***

Several amendment definition scenarios were evaluated to get a sense of their impacts. The impacts were measured by the quantity of amendments. No metric can capture the entire planning process, but this measure is one quantifiable way to get a sense of how impactful a given scenario may be. See Appendix 3 for details on the scenarios evaluated.

Proposed changes to cost-based amendments to highway projects include:

- ***Use Federal phase cost instead of Total phase cost***

Using Federal funds as the basis of cost amendments ties more directly with the required Federal approval of amendments. Additionally, using Federal funds as the basis of cost amendments has the advantage of changes to non-participating project components would no longer trigger the amendment process.

Using only the change to the Federal fund component of a phase cost as the basis for amendments is expected to reduce the quantity of amendments significantly. This is because the Federal funds for a phase tend to fluctuate less than the non-Federal funds between the time a project is programmed in the STIP/TIP and the project nears obligation.

➤ ***Use a Tiered percent change system instead of a flat percent change***

With a tiered system, the percentage cost change triggering an amendment would differ by the magnitude of the phase cost. A tiered system would reduce instances where a small cost change on a small phase cost triggers the amendment process. The amendment threshold for cost changes would be more forgiving for less expensive phases in comparison to more expensive phases.

Using a tiered system is expected to reduce the quantity of amendments, potentially significantly depending on how the tiers are structured. This is due to a reduction of amendments being triggered by small cost changes on small phase costs. A majority of Michigan's program tends to have lower-dollar phase costs (see Appendix 2), so refining the amendment definition to a tiered system could be impactful.

Input from Partners

FHWA would like to receive input on the proposed changes to cost-based STIP/TIP amendments. **Please provide your written comments to Andy Pickard at andy.pickard@dot.gov by June 26, 2020.** FHWA will then work with MDOT and the MPOs on reviewing and discussing comments received and how to proceed. Virtual meetings will be used as needed due to the coronavirus pandemic.

Appendices

Appendix 1: Relevant Federal regulations

23 CFR 450.104 defines "Amendment":

Amendment means a revision to a long-range statewide or metropolitan transportation plan, TIP, or STIP that involves a major change to a project included in a metropolitan transportation plan, TIP, or STIP, including the addition or deletion of a project or a major change in project cost, project/project phase initiation dates, or a major change in design concept or design scope (e.g., changing project termini or the number of through traffic lanes or changing the number of stations in the case of fixed guideway transit projects). Changes to projects that are included only for illustrative purposes do not require an amendment. An amendment is a revision that requires public review and comment and a redemonstration of fiscal constraint. If an amendment involves "non-exempt" projects in nonattainment and maintenance areas, a conformity determination is required.

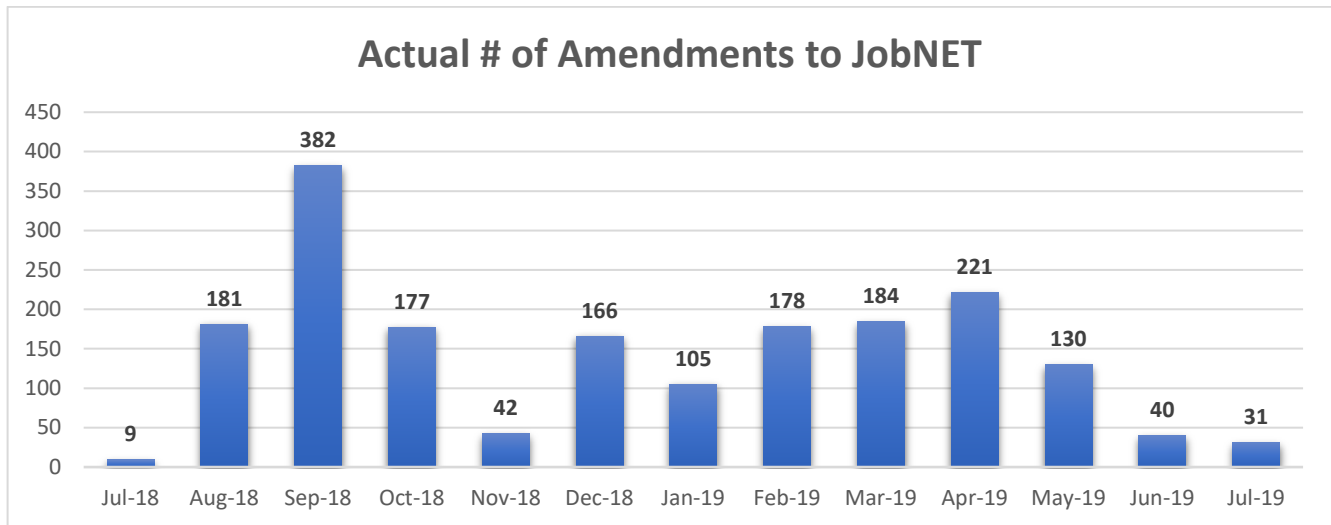
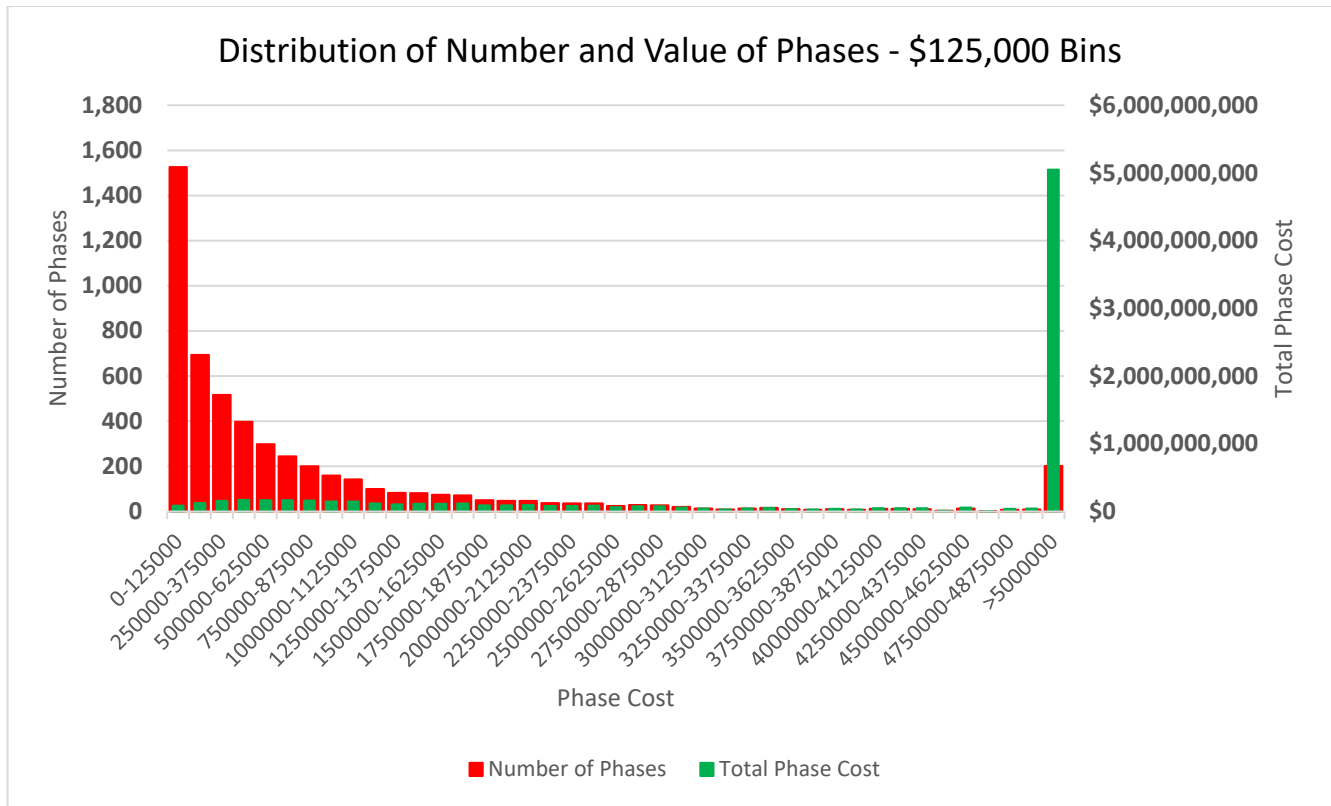
23 CFR 450.328 addresses revisions to the TIP involving fiscal constraint as "Amendments"

(a) An MPO may revise the TIP at any time under procedures agreed to by the cooperating parties consistent with the procedures established in this part for its development and approval. In nonattainment or maintenance areas for transportation-related pollutants, if a TIP amendment involves non-exempt projects (per 40 CFR part 93), or is replaced with an updated TIP, the MPO and the FHWA and the FTA must make a new conformity determination. In all areas, changes that affect fiscal constraint must take place by amendment of the TIP. The MPO shall use public participation procedures consistent with §450.316(a) in revising the TIP, except that these procedures are not required for administrative modifications.

(b) After approval by the MPO and the Governor, the State shall include the TIP without change, directly or by reference, in the STIP required under 23 U.S.C. 135. In nonattainment and maintenance areas, the FHWA and the FTA must make a conformity finding on the TIP before it is included in the STIP. A copy of the approved TIP shall be provided to the FHWA and the FTA.

(c) The State shall notify the MPO and Federal land management agencies when it has included a TIP including projects under the jurisdiction of these agencies in the STIP.

Appendix 2: Additional background Information



Appendix 3: Scenario testing

STIP/TIP phases in FY19 were inventoried over a span of three months to create a database of actual cost changes to work from. Amendment scenarios were then applied to the data to evaluate the resulting number of amendments. General Program Account (GPA) policies were not evaluated. Naming conventions for scenarios (Option 1, Option 2, etc.) are not an indication of ranking or preference.

Scenario	Number of Amendments	Difference vs Base	% Difference vs Base
BASE +/- 25% of Total Phase Cost	190	na	na
OPTION 1 +/- 25% Federal Phase Cost	116	-74	-39%
OPTION 2 + 25% Total Phase Cost	57	-133	-70%
OPTION 3 < \$500k Federal: +/-50% \$500k to \$1 M: +/-40% \$1M to \$5M: +/-30% > \$5M: +/-20%	82	-108	-57%
OPTION 4 < \$250k Total: +/- 40% \$250k to \$1M: +/- 30% \$1M to \$3M: +/- 20% > \$3M: +/-10%	175	-15	-8%
OPTION 5 < \$100k Federal: no amendments needed \$100k to \$250k: +/- 50% \$250k to \$1M: +/- 40% \$1M to \$3M: +/- 30% > \$3M: +/-20%	53	-137	-72%
OPTION 6 < \$150k Total: no amendments needed \$ 150k to \$1M: +/- 40% \$1M to \$5M: +/-30% > \$5M: +/- 20%	103	-87	-46%
OPTION 7 < \$150k Federal: no amendments needed \$ 150k to \$1M: +/- 40% \$1M to \$5M: +/-30% > \$5M: +/- 20%	50	-140	-74%
OPTION 8 Cost curve: % Change = 53.9*(Total Phase Cost ^-0.37)	119	-71	-37%



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Portage, MI 49002

☎ 269-343-0766

✉ info@KATSmpo.org

The Kalamazoo Area Transportation Study (KATS) is providing the following comments on the Federal Highway Administration's (FHWA) request for input on the *Cost-based State Transportation Improvement Program (STIP)/Transportation Improvement Program (TIP) Amendments for Highway Projects in Michigan* white paper, dated April 8, 2020.

KATS appreciates the analysis and thought that went into the proposal presented by FHWA. KATS has been involved in the development of the online STIP/TIP through the JobNet environment since its inception. While the process has been lengthy, the outcomes have dramatically improved TIP amendment processing times and improved the cooperative planning process between KATS and our partner agencies.

Comments on the Proposal

KATS participated in the lengthy development of the amendment "triggers" in the JobNet environment and the definition of total project cost through the Michigan Transportation Planning Association (MTPA). On September 28, 2019 KATS adopted clear and concise administrative procedures to match those established through MTPA and implemented in JobNet. Those procedures were adopted with the understanding they would be re-evaluated with the development of the next TIP. Therefore:

- Changing procedures in the middle of the TIP cycle is confusing to local agencies and the public, while having the potential to impact the reliability of the metropolitan planning process.
- To better inform future changes, a larger sample size of amendments would paint a better picture before potentially adjusting thresholds. This sample should also include all amendment triggers (scope, length, etc.) so that the entire amendment process can be evaluated.
- To better implement federal regulations, KATS believes that the MPOs and MDOT should come to consensus on defining cost based STIP/TIP amendments:
 - *23 CFR 450.326 (a) The MPO, in cooperation with the State(s) and any affected public transportation operator(s) shall develop a TIP for the metropolitan planning area.*
 - *450.328 (a) An MPO may revise the TIP at any time under procedures agreed to by the cooperating parties consistent with the procedures established in this part for its development and approval.*
- The current amendment thresholds adopted by KATS are used for highway and transit projects. KATS would like to see Federal Transit Administration (FTA), MDOT Office of Passenger Transportation, and local transit agency involvement in the discussion to keep the process uniform for all parties.
- While KATS understands the volume of amendments the current process creates, it also sets a high standard for public involvement by processing the changes through the amendment requirements. The simple goal of reducing amendments is not conducive to a fully engaged process.
- To keep the process consistent for all projects, KATS believes a uniform percentage should be used for amendments on all projects and that a tiered approach will create confusion within local agencies and the public.
- During a time of limited resources, adding programming changes to the already lengthy JobNet request backlog could delay other needed revisions.

The KATS looks forward to discussing the comments received with FHWA, FTA, and MDOT through the Michigan Transportation Planning Association through a continuing, cooperative, and comprehensive process.