



**Metro is in receipt of the 2024-27 MTIP March 2025 Formal Amendment for Resolution 25-5473**

Amendment Purpose Statement for Resolution 25-5473 (Amendment Number MR25-08-MAR)

**FOR THE PURPOSE OF ADDING A NEW ODOT PUBLIC TRANSPORTATION AWARDED PROJECT INTO THE 2024-27 MTIP  
FOR TRIMET SUPPORTING ELDERLY AND DISABLED PERSONS TRANSIT NEEDS**

**Public Notification Comment Opportunities for the March 2025 Formal MTIP Amendment for Resolution 25-5473**

The public review period for this project amendment is [3/4/2025](#) and concludes on [4/2/2025](#), at 5:00 pm.

Requests to submit comments or concerns about this amendment should be submitted to Summer Blackhorse, via email at [summer.blackhorse@oregonmetro.gov](mailto:summer.blackhorse@oregonmetro.gov). Subject to revisions to address comments received during the public comment period, the 2021-24 MTIP as revised by the proposed amendment will be the final program unless amended, and a final notice will not be published.

**Added Notes**

The March 2025 MTIP Formal Amendment contains one new project being added to the 2024-27 MTIP. The project is a new ODOT Public Transportation Division awarded project to TriMet. The \$2.13 million federal award will support a replacement bus/vehicle purchase. The replacement bus/vehicle purchase supports elderly and disabled person transportation needs under FTA's 5310 program. A summary of the changes is included in the Exhibit A MTIP worksheet that follows after the formal amendment matrix summary.

Submission of public comments for the January formal amendment bundles may occur by attending one of the two Metro approval committees required for the formal amendment to complete:

- (1) Transportation Policy Alternatives Committee (TPAC).
- (2) At the Joint Policy Advisory Committee on Transportation (JPACT).

Public comments can occur at the Metro Council where the formal amendment receives final Metro approval. Please check the Metro website for the specific committee to see if the amendment is included on that month's agenda. Finally, written comments may be emailed or submitted in letter form via email or mailed directly to Metro.

Formal MTIP amendments represent a significant change to a project from the original funding or scope of improvement activities. The various required Metro process and approval steps are intended to demonstrate that the required changes have no significant impact upon air conformity, plus fiscal constraint is still maintained, and/or the priorities, policies, and goals established in the approved Regional Transportation Plan (RTP) have not changed. Formal MTIP amendments normally fall into one or more categories:

1. Significantly adds, revises, reduces, or changes the project scope of improvement activities.
2. Requires a significant change to the project limits (greater than 1 mile).
3. Involves a significant cost change (increase or decrease normally 20% or 30% greater).
4. Adds or cancels a project from the MTIP.

Additional guidance about the thresholds for completing administrative changes versus formal/full amendments is covered in the MTIP Amendment Matrix in Chapter 8, Administering the 2024-2027 Metropolitan Transportation Improvement Program (MTIP). A summary of the project change thresholds that trigger the need to complete a MTIP formal amendment is listed below, A summary of the project changes follows on the next pages.

<b>Metro Formal Amendment Matrix for the MTIP As of November, 2024</b>	
Number	Item
1	<b>JPACT &amp; METRO Council Authorized Discretion:</b> JPACT or Council may require any project amendment to complete a formal amendment
2	<b>Adding or Canceling Projects:</b> Adding new projects or canceling projects from the TIP. Includes canceling the construction phase and adding planning projects
3	<b>Project Locations and /or Milepost Limits Changes:</b> Limit changes that exceed 1 mile. Consideration required for 0.5 miles up to a mile as well where NEPA, air quality, and/or transportation modeling impacts may be involved.
4	<b>Major Project Scope or Work Element Adjustments:</b> Changes including scope, work element changes that impact the NEPA environmental document, air quality analysis, transportation modeling network, or result in the project no longer being consistent with the approved RTP. A completed Performance Assessment Evaluation also may be required as part of the formal amendment for capacity enhancing projects that exceed \$100 million dollars.

5	<p><b>Changes in Fiscal Constraint due to Cost Changes by the Following Criteria:</b></p> <ul style="list-style-type: none"> <li>• Projects under \$1M – cost increases over 50%</li> <li>• Projects between \$1 million to \$5 million – cost increases over 30%</li> <li>• Projects over \$5 million – cost increases over 20%</li> </ul> <p>JPACT/Metro Council also authorizes MTIP staff with discretionary authority to exceed the above threshold limits under certain circumstances by up to another 10% when the cost increase is primarily due to an inflationary cost update where no scope or limit changes are also occurring enabling the cost change to occur as an administrative modification.</p>
6	<p><b>Adding Permanent Emergency Relief Projects:</b> For ER funded projects completing permanent upgrades as part of a disaster mitigation effort. Temporary ER projects are not added to the MTIP.</p>
7	<p><b>Adding a Federally Funded Planning Project:</b> Adding a federally funded planning project where only funding is added to the planning phase requires the completion of a formal amendment to the MTIP.</p>
8	<p><b>Adding a Non-Regionally Significant New Project Regardless of Funding Type to the MTIP:</b> Applies to other federally funded project (e.g. RTP, OCP, etc.) projects not located on of the Metro modeling networks where FHWA requires an approval step verification from the MTIP.</p>

**Notes:**

- The above items represent the project change “thresholds” that trigger a formal/full amendment to the MTIP.
- In addition to the above change thresholds, the Metro approval process requires:
  - An amendment approval recommendation from Metro’s Transportation Policy Alternatives Committee (TPAC) to Metro’s Joint Policy Advisory Committee on Transportation (JPACT).
  - Approval by JPACT and an approval recommendation to Metro Council.
  - Approval by Metro Council.
- A final review and corresponding approvals also are required by:
  - The Oregon Department of Transportation (ODOT).
  - Federal Transit Administration (FTA).
  - Federal Highways Administration (FHWA).
- Projects with changes that are considered less than the stated thresholds for formal amendment normally can occur through an administrative modification. This does not require TPAC, JPACT, or Council approval steps. The changes also do not require ODOT, FTA, or FHWA approvals.
- Project changes that complete an administrative modification are normally reported to TPAC through a monthly Submitted Amendments Report in the TPAC Comments from the Chair agenda section.

**Exhibit A**  
**March 2025, Formal/Full MTIP Amendment Summary**  
**Formal Amendment #: MR25-08-MAR**

The March 2025 MTIP Formal Amendment contains one new project being added to the 2024-27 MTIP from the ODOT Public Transportation Division (PTD). A summary of the project is shown below:

**Key 23838 (New Project) - Transit Vehicle Replacement Tri-Met FFY25 (ODOT PTD):** Key 23838 was awarded \$2.13 million of federal State Surface Transportation Block Grant funds supporting the procurement of FTA Section 5310 replacement paratransit buses/vehicles that support the transportation needs of older adults and people with disabilities when the transportation service provided is unavailable or insufficient, or inappropriate. ODOT will transfer the funds to the Federal Transit Administration (FTA) via a process called “flex transfer”. Once this is complete, TriMet will be able to access, obligate, expend the funds through the FTA oversight process.

Exhibit A Table (MTIP Worksheets) follow on the next pages and contain the specific project changes for the FFY 2025 March Formal MTIP Amendment.

2024-2027 Metropolitan Transportation Improvement Program  
**Exhibit A to Resolution 25-5473**

**March 2025 Formal Amendment Bundle Contents**  
**Amendment Type: Formal/Full**  
**Amendment #: MR25-08-MAR**  
**Total Number of Projects: 1**

Key Number & MTIP ID	Lead Agency	Project Name	Project Description	Amendment Action
<b>Category: Adding New Projects to the 2024-2027 MTIP:</b>				
(#1) ODOT Key # <b>23838</b> MTIP ID TBD <i>New Project</i>	ODOT PTD	<b>Transit Vehicle Replacement Tri-Met FFY25</b>	ODOT PTD funding to TriMet supporting FTA 5310 paratransit replacement bus/vehicle procurements to meet the transportation needs of older adults and people with disabilities when the transportation service provided is unavailable or insufficient.	<b><u>ADD NEW PROJECT:</u></b> The formal amendment adds the new award for TriMet supporting FTA 5310 program area needs to procure replacement buses/vehicles.

<b>Proposed Amendment Review and Approval Steps</b>	
<b>March 2025 (MR25-08-MAR) Formal Amendment estimated processing and approval timing</b>	
Date	Action
Tuesday, March 4, 2025	Post amendment & begin 30-day notification/comment period. (Comment period is March 4, 2025 to April 2, 2025.)
Friday, March 7, 2025	Metro Transportation Policy Alternative Committee (TPAC) – Amendment overview, and approval recommendation provided to JPACT
Thursday, March 20, 2025	JPACT Meeting – Amendment approval consideration.
Thursday, April 10, 2025	Metro Council Meeting – Final Metro amendment approval request.
June, 2025?	Estimated final FHWA MTIP amendment approval and inclusion in the approved STIP completed.

Added Notes:

1. Approval by FTA will be required for this amendment along with final approval from FHWA.
2. The FTA approval assumes FTA lifts their formal/full MTIP/STIP amendments pause by April 2025 allowing the formal amendment to receive the required FTA approval.
3. As of February 21, 2025, all formal/full MTIP amendments now require approvals by both the state FHWA office and Headquarters FHWA in Washington DC.



**Metro**  
**2024-27 Metropolitan Transportation Improvement Program (MTIP)**  
**PROJECT AMENDMENT DETAIL WORKSHEET**  
**Federal Fiscal Year 2025**

MTIP Formal Amendment  
**ADD NEW PROJECT**  
 Add the ODOT PTD awarded 5310  
 vehicle replacement project

**Project #1**

Project Details Summary							
ODOT Key #	23838	RFFA ID:	N/A	RTP ID:	10928	RTP Approval Date:	11/30/2023
MTIP ID:	TBD	CDS ID:	N/A	Bridge #:	N/A	<b>FTA Flex &amp; Conversion Code</b>	<b>Yes, 5310</b>
MTIP Amendment ID:		MR25-08-MAR		STIP Amendment ID:		24-27-2324	

**Summary of Amendment Changes Occurring:**  
 The formal amendment adds the new 5310 paratransit vehicle replacement project award to the MTIP. Funding is awarded from the ODOT Public Transportation Division (PTD) to TriMet in support of FTA Section 5310 program areas. The funding will support 5310 program area replacement vehicle procurements,

Project Name:	<b>Transit Vehicle Replacement Tri-Met FFY25</b>						
Lead Agency:	ODOT PTD	Applicant:	ODOT		Administrator:	ODOT	
Certified Agency Delivery:	No	Non-Certified Agency Delivery:	No		Delivery as Direct Recipient:	Yes	

**Short Description:**  
 ODOT PTD funding to TriMet supporting FTA 5310 paratransit replacement bus/vehicle procurements to meet the transportation needs of older adults and people with disabilities when the transportation service provided is unavailable or insufficient.

**MTIP Detailed Description (Internal Metro use only):**  
 ODOT PTD FFY 2025 award to TriMet supporting the procurement of FTA Section 5310 replacement paratransit buses/vehicles that support the transportation needs of older adults and people with disabilities when the transportation service provided is unavailable or insufficient, or inappropriate. State STBG will be flex transferred to FTA for TriMet.

**STIP Description:**  
 Funding for replacement or right sizing of category A or B transit vehicles in urban areas. This project will be delivered through FTA.

Project Classification Details											
Project Type	Category		Features				System Investment Type				
Transit	Transit - Vehicles		Vehicles - Replacement				Capital Improvement				
ODOT Work Type:	TRANSIT										
Phase Funding and Programming											
Fund Type	Fund Code	Year	Planning	Preliminary Engineering (PE)	Right of Way (ROW)	Utility Relocation (UR)	Construction (Cons)	Other	Total		
Federal Funds											
State STBG	Y240	2025						\$ 2,134,621	\$ 2,134,621		
									\$ -		
Federal Totals:			\$ -		\$ -	\$ -		\$ 2,134,621	\$ 2,134,621		
State Funds											
Fund Type	Fund Code	Year	Planning	Preliminary Engineering (PE)	Right of Way (ROW)	Utility Relocation	Construction	Other	Total		
									\$ -		
									\$ -		
State Totals:			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
Local Funds											
Fund Type	Fund Code	Year	Planning	Preliminary Engineering (PE)	Right of Way (ROW)	Utility Relocation	Construction	Other	Total		
Local	Match	2025						\$ 244,317	\$ 244,317		
									\$ -		
Local Totals:			\$ -	\$ -	\$ -	\$ -		\$ 244,317	\$ 244,317		
Phase Totals			Planning	PE	ROW	UR	Cons	Other	Total		
Existing Programming Totals:			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	<del>\$ -</del>		
Amended Programming Totals			\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,378,938	\$ 2,378,938		
								Total Estimated Project Cost	\$ 2,378,938		
								Total Cost in Year of Expenditure:	\$ 2,378,938		

Programming Summary	Yes/No	Reason if short Programmed					
Is the project short programmed?	No	The project is not short programmed.					
Programming Adjustments Details	Planning	PE	ROW	UR	Cons	Other	Totals
Phase Programming Change:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,378,938	\$ 2,378,938
Phase Change Percent:	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%	100.0%
Amended Phase Matching Funds:	\$ -		\$ -	\$ -		\$ 244,317	\$ 244,317
Amended Phase Matching Percent:	N/A	N/A	N/A	N/A	N/A	10.27%	10.27%

### Phase Programming Summary Totals

Fund Category	Planning	Preliminary Engineering (PE)	Right of Way (ROW)	Utility Relocation	Construction	Other	Total
Federal	\$ -		\$ -	\$ -		\$ 2,134,621	\$ 2,134,621
State	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Local	\$ -	\$ -	\$ -	\$ -		\$ 244,317	\$ 244,317
Total	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,378,938	\$ 2,378,938

### Phase Composition Percentages

Fund Type	Planning	PE	ROW	UR	Cons	Other	Total
Federal	0.0%	0.0%	0.0%	0.0%	0.0%	89.73%	89.73%
State	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Local	0.0%	0.0%	0.0%	0.0%	0.0%	10.27%	10.27%
Total	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	100.0%

### Phase Programming Percentage

Fund Category	Planning	Preliminary Engineering (PE)	Right of Way (ROW)	Utility Relocation	Construction	Other	Total
Federal	0.0%	0.0%	0.0%	0.0%	0.0%	89.7%	89.73%
State	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Local	0.0%	0.0%	0.0%	0.0%	0.0%	10.3%	10.27%
Total	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	100.0%



Project Phase Obligation History							
Item	Planning	PE	ROW	UR	Cons	Other	Federal
Total Funds Obligated							Aid ID
Federal Funds Obligated:							TrAMS grant ID
EA Number:							FHWA or FTA
Initial Obligation Date:							FTA
EA End Date:							FMIS or TRAMS
Known Expenditures:							TrAMS
						Estimated Project Completion Date:	12/31/2028
Completion Date Notes:							
<b>Are federal funds being flex transferred to FTA?</b>		<b>Yes</b>	<b>If yes, expected FTA conversion code:</b>			<b>5310</b>	

Fiscal Constraint Consistency Review
1. What is the source of funding? <b>ODOT Public Transportation Division award to TriMet</b>
2. Does the amendment include changes or updates to the project funding? <b>Yes. New State STBG (to be flex transferred to FTA and for TriMet is being added to the MTIP</b>
3. Was proof-of-funding documentation provided to verify the funding change? <b>Yes, via STIP Impacts Worksheet and confirmation from the ODOT Statewide Investments Management Section Manager</b>
4. Level of funding approval? <b>ODOT Public Transportation manager level and the ODOT Statewide Investments Management Section Manager</b>
5. Has the fiscal constraint requirement been properly demonstrated and satisfied as part of the MTIP amendment? <b>Adequate for now.</b>

Project Location References					
On State Highway	Yes/No	Route	MP Begin	MP End	Length
	No	Not Applicable	Not Applicable	Not Applicable	
Cross Streets	Route or Arterial		Cross Street		Cross Street
	Not Applicable		Not Applicable		Not Applicable

Summary of MTIP Programming and Last Formal/Full Amendment or Administrative Modification						
1st Year Programmed	2025	Years Active	0	Project Status	T21	Identified in Transit Plan and approved by Board. Moving forward to program in MTIP
Total Prior Amendments	0	Last Amendment	Not Applicable	Date of Last Amendment	Not Applicable	Last MTIP Amend Num
Last Amendment Action	Not Applicable					

<b>RTP Air Quality Conformity and Transportation Modeling Designations</b>	
Is this a capacity enhancing or non-capacity enhancing project?	<b>Non-capacity enhancing project</b>
Is the project exempt from a conformity determination per 40 CFR 93.126, Table 2 or 40 CFR 93.127, Table 3?	<b>Yes. The project is exempt per 40 CFR 93.126, Table 2</b>
Exemption Reference:	<b>Mass Transit - Purchase of new buses and rail cars to replace existing vehicles or for minor expansions of the fleet</b>
Was an air analysis required as part of RTP inclusion?	<b>No. Not Applicable</b>
If capacity enhancing, was transportation modeling analysis completed as part of RTP inclusion?	<b>No. Not applicable. The project is not capacity enhancing</b>
RTP Constrained Project ID and Name:	<b>RTP ID - 10928: Operating Capital: Fleet Vehicles: Phase 1</b>
RTP Project Description:	<b>Replacement, refurbishment and/or service expansion of zero emission buses, articulated buses, light rail and LIFT vehicles.</b>

<b>Additional RTP Consistency Check Areas</b>	
1. Is the project designated as a Transportation Control Measure? <b>No.</b>	
2. Is the project identified on the Congestion Management Process (CMP) plan? <b>No.</b>	
3. Is the project included as part of the approved: UPWP? <b>No. Not applicable.</b>	
3a. If yes, is an amendment required to the UPWP? <b>No.</b>	
3b. Can the project MTIP amendment proceed before the UPWP amendment? <b>Yes.</b>	
3c. What is the UPWP category (Master Agreement, Metro funded stand-alone, Non-Metro funded Regionally Significant)? <b>Not applicable</b>	
4. Applicable RTP Goals: <u><b>Goal # 1 -Mobility Options:</b></u> Objective 1.3 - Access to Transit: Increase household and job access to current and planned frequent transit service. <u><b>Goal #3 - Equitable Transportation:</b></u> Objective 3.2 -Barrier Free Transportation: Eliminate barriers that people of color, low income people, youth, older adults, people with disabilities and other marginalized communities face to meeting their travel needs.	
5. Does the project require a special performance assessment evaluation as part of the MTIP amendment? <b>No. The project is not capacity enhancing nor does it exceed \$100 million in total project cost.</b>	

<b>Public Notification/Opportunity to Comment Consistency Requirement</b>	
1. Is a 30-day/opportunity to comment period required as part of the amendment? <b>Yes.</b>	
2. What are the start and end dates for the comment period? <b>Estimated to be Tuesday, March 4, 2025 to Wednesday, April 2, 2025</b>	
3. Was the comment period completed consistent with the Metro Public Participation Plan? <b>Yes.</b>	
4. Was the comment period included on the Metro website allowing email submissions as comments? <b>Yes.</b>	

5. Did the project amendment result in a significant number of comments? **Comments are not expected other than a possible description revision request from TriMet as part of the public comments period**

6. Did the comments require a comment log and submission plus review by Metro Communications staff and to Council Office? **No comments expected. If comments are received, they will be logged, reviewed, and sent on to Metro Council and Council staff for their assessment.**

### Fund Codes References

Local	General Local funds committed by the lead agency that normally cover the minimum match requirement to the federal funds
STBG	Surface Transportation Block Grant funds. A federal funding source (FHWA based) appropriated to the State DOT. The Surface Transportation Block Grant Program (STBG) promotes flexibility in State and local transportation decisions and provides flexible funding to best address State and local transportation needs.
State STBG	Appropriated STBG that remains under ODOT's management and commitment to eligible projects.
5310	FTA Section 5310 funding are federal funds intended to improve mobility for seniors and individuals with disabilities by removing barriers to transportation service and expanding transportation mobility options. This program supports transportation services planned, designed, and carried out to meet the special transportation needs of seniors and individuals with disabilities in all areas

### Financial Plan -- Estimate / Actual Amounts

Phase	Funding Resp	STIP	Year	Total Est/Act Amt	Fed Est/Act Amt	State Est/Act Amt	Local Est/Act Amt	Comment
OT	SW TRANSIT	2024-2027 STIP	2025	2,378,938.00	2,134,621.00	0.00	244,317.00	1/14/25: Create new project per 24-27-2324.
	<b>OT Totals</b>			<b>2,378,938.00</b>	<b>2,134,621.00</b>	<b>0.00</b>	<b>244,317.00</b>	
<b>Grand Totals</b>				<b>2,378,938.00</b>	<b>2,134,621.00</b>	<b>0.00</b>	<b>244,317.00</b>	

### Fund Codes

Phase	Fund Code	Description	Percent of Phase	Total Amount	Federal Percent	Federal Amount	State Percent	State Amount	Local Percent	Local Amount
OT	Y240	Surface Transportation Block Grant (STBG) - Flex IIIA	100.00%	2,378,938.00	89.73%	2,134,621.00	0.00%	0.00	10.27%	244,317.00
	<b>OT Totals</b>			<b>100.00%</b>	<b>2,378,938.00</b>		<b>2,134,621.00</b>		<b>0.00</b>	
<b>Grand Totals</b>					<b>2,378,938.00</b>	<b>2,134,621.00</b>		<b>0.00</b>		<b>244,317.00</b>

**Modeling Network , NHS, and Performance Measure Designations**

**National Highway System and Functional Classification Designations**

System	Y/N	Route	Designation
NHS Project	N/A	Not Applicable	Not Applicable
Functional Classification	N/A	Not Applicable	Not Applicable
Federal Aid Eligible Facility	N/A	Not Applicable	Not Applicable

**Anticipated Required Performance Measurements Monitoring**

Metro RTP Performance Measurements	Provides Congestion Mitigation	Provides Climate Change Reduction	Provides Economic Prosperity	Located in an Equity Focus Area (EFA)	Provides Mobility Improvement	Safety Upgrade Type Project	Safety High Injury Corridor	Notes
				X	X			

Added notes: