TPB Technical Committee
September 4, 2026
Item 5

National Capital Region Transportation Plan and Transportation Improvement Program

Amendment and Administrative Modification Procedures

National Capital Region
Transportation Planning Board

Draft September 1, 2026

AMENDMENT AND ADMINISTRATIVE MODIFICATION PROCEDURES
Draft September 1, 2026

ABOUT THE TPB
The National Capital Region Transportation Planning Board (TPB) is the federally designated metropolitan planning organization (MPO) for metropolitan Washington. It is responsible for developing and carrying out a continuing, cooperative, and comprehensive transportation planning process in the metropolitan area. Members of the TPB include representatives of the transportation agencies of the states of Maryland and Virginia and the District of Columbia, local governments, the Washington Metropolitan Area Transit Authority, the Maryland and Virginia General Assemblies, and nonvoting members from the Metropolitan Washington Airports Authority and federal agencies. The TPB is staffed by the Department of Transportation Planning at the Metropolitan Washington Council of Governments (COG).

CREDITS
Contributing Editors: Lyn, Erickson, Cristina Finch, Marc Moser, Sara Stockdale
Design: Clark Communications
Cover Photo Credits: Ebike, Washington, DC (Elvert Barnes/Flickr);Creek path, Frederick, MD (Jennifer Boyer/Flickr); Frederick Douglass Bridge, Washington, DC (Ron Cogswell/Flickr); EV Charger (Quality Stock Arts/Shutterstock): MARC Train, Baltimore, MD (Elvert Barnes/Flickr); I-66 (COG); Brookland Open Streets, Washington, DC (Joe Flood/Flickr)

ACKNOWLEDGEMENTS
The preparation of this report was financially aided through grants from the District of Columbia Department of Transportation; Maryland Department of Transportation; Virginia Department of Transportation; the Virginia Department of Rail and Public Transportation; U.S. Department of Transportation, Federal Highway Administration; and the U.S. Department of Transportation, Federal Transit Administration.

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OVERVIEW OF PROCEDURES FOR REVISIONS TO THE METROPOLITAN TRANSPORTATION PLAN AND THE TRANSPORTATION IMPROVEMENT PROGRAM

The National Capital Region Transportation Planning Board (TPB) is responsible for approving the metropolitan transportation plan (MTP) and transportation improvement program (TIP) for the metropolitan Washington region. Once the MTP and the TIP have been determined to meet the financial constraint and air quality conformity requirements and are approved by the TPB, they become the Plan and TIP of record.

Due to the complex nature of proposing, studying, engineering, and constructing transportation projects, details of the various project phases are always in flux. As projects evolve, implementing agencies frequently need to request revisions to the TIP, and sometimes even to the MTP, between their regularly scheduled updates. Revisions could include cost, scope, or schedule changes. This document explains how the TPB ensures that the MTP and TIP remain financially constrained.

On January 16, 2008, the TPB adopted procedures for processing amendments to its MTP and TIP. All amendments required action by the TPB's Steering Committee and/or the full board and often required public review. In 2012, the passage of the Moving Ahead for Progress in the 21st Century Act (MAP-21) defined a new option for processing smaller scale revisions to the TIP through administrative modifications. These are minor changes to project or project phase costs, funding sources, and project or project phase initiation dates, and they do not require public review or comment. Exactly what counts as a "minor change" has been defined in a series of Memoranda of Understanding (MOUs) between the U.S. Department of Transportation (USDOT) and the region's three DOTs: the District of Columbia Department of Transportation (DDOT), the Maryland Department of Transportation (MDOT), and the Virginia Department of Transportation (VDOT). This has led to the development of the amendment and administrative modification procedures in this document that are regionally compatible but still tailored to each agency's needs. These procedures are in accordance with the USDOT planning regulations 23 CFR 450. These procedures are based on the most recently amended version by TPB Steering Committee Resolution SR 8-2020 on September 6, 2019.

According to 23 CFR 450.326: TIP Revisions and Relationship to the STIP, the regional TIP projects must be included without change in a federally approved state transportation improvement program (STIP) in order for them to receive federal funding. In the metropolitan Washington region, DDOT, MDOT, and VDOT each provide the project descriptions and funding information for the development of the regional TIP and MTP. Each DOT has adopted procedures for revising its STIP. When it becomes necessary for a DOT to revise project information in the STIP, its procedures must be consistent with the TPB procedures for revising its regional TIP.

Revisions to the MTP will, at a minimum, require action by the TPB Steering Committee and may ultimately require an off-cycle conformity analysis, which could take up to a year to process. As such, any revisions to the MTP will be considered on an individual basis and will require significant advanced notice to TPB staff. In practice, most administrative modifications and amendments are made to the TPB's TIP. Accordingly, this document is primarily focused on updating projects and programs in the TIP.

TPB'S ROLE AND KEY STAFF

The TPB serves as the Metropolitan Planning Organization (MPO) for the National Capital Region and prepares the regional MTP and the TIP. The TPB's role is to revise these documents ensuring their consistency with regional goals and other local members' plans. Key staff involved with handling amendments and administrative modifications are noted in Table 1.

TABLE 1: KEY STAFF

TPB Staff	Title	Role
Kanti Srikanth	Executive Director	Staff Director for the Transportation Planning Board (TPB)
Lyn Erickson	Chief Program Director	Contributor
Cristina Finch	Program Manager	Contributor
Sara Stockdale	Senior Transportation Planner	Contributor
Marc Moser	Associate Transportation Planner	Contributor

Once the TPB approves the MTP and the TIP, TPB staff will establish a schedule of alternating periods for processing amendments and administrative modifications each month. At the beginning of each period, staff will issue a call for MTP/TIP amendments or administrative modifications via email, posted on the Project InfoTrak homepage/dashboard, and any other communication platforms in use at the time. TPB staff will assist staff from member agencies if there are any questions as to which type of action a proposed change would require.

MTP/TIP administrative modifications are reviewed by TPB staff. If the proposed actions are consistent with the criteria listed in the Defining Amendments, Administrative Modifications and Technical Corrections section, and the guidelines provided in the Establishing Financial Constraint section of this document then staff will process and approve the administrative modification request(s) on behalf of the Director.

For amendments, staff review the proposed revisions and prepare a resolution to approve the amendments to be considered by the TPB Steering Committee or the TPB itself, depending on the size and nature of the changes proposed, according to the guidelines provided in the Procedures section of the document. At the meeting where the amendments are slated for approval, TPB staff will be present to provide any notable comments during the discussion of the items prior to their approval. Following the TPB's review and consent of the Steering Committee's action at the next TPB meeting or direct approval by the TPB, staff will transmit an officially approved version of the resolution and amendment to the relevant agencies.

Role of TPB Subcommittees

Each month, the TPB Steering Committee approves amendments to the TIP that are exempt from or meet the air quality conformity requirement. The TPB Bylaws endow the Steering Committee with full authority to act on its behalf in the approval of amendments to the MTP and the TIP on non-regionally significant items. The phrase "non-regionally significant items" (and its inverse) is not the same as a project that may be considered "regionally significant" (or not) for the purposes of an air quality conformity analysis. As used in the TPB Bylaws, the term is subjective and multiple factors such as the scope and scale of the project and the additional amount of proposed funding may be considered.

ROLE OF KEY PLANNING AGENCIES

Key planning agencies include states, local jurisdictions, and transit agencies. The agencies' role is to provide the TPB with the details of their investment strategies for inclusion in the MTP or TIP and update their project or program information in the TPB's Project InfoTrak database when there is an administrative modification or amendment.

For administrative modifications, the agencies will submit a request via email to the Staff Director for the TPB or their designee. For amendments, the agencies must submit a signed letter to the Chair of the TPB.

PUBLIC ENGAGEMENT

The TPB Public Participation Plan[1] guides TPB staff on public engagement. The Participation Plan states the TPB will conduct a Public Forum on the TIP with each new adoption of a TIP. TPB staff use this forum as an opportunity to educate community members on federal, regional, state, and local transportation funding. In accordance with the Participation Plan, the TPB holds a public comment period before approval of a newly updated TIP. If any agency requests an amendment to update its entire section of the TIP, this is akin to a new TIP update for that agency; thus, also requiring a 30-day public comment period.

For revisions that require amending the TIP without updating the conformity analysis, TPB staff will prepare a resolution with accompanying materials to describe the proposed revision(s) to be reviewed and approved by the TPB Steering Committee. The resolution(s) and accompanying materials are typically posted to the Steering Committee's next upcoming meeting page one week prior to the meeting date. A subscription-based email is sent the same day that the materials have been posted.

The TPB Steering Committee generally meets on the first Friday of the month, unless pre-empted by a holiday. Steering Committee meetings are streamed live and recorded on YouTube, where the public is invited to watch and listen. Following approval by the Steering Committee, the TPB will receive a report on the action at their next meeting, at which point any member or alternate may ask the board to review or reconsider any action taken by the Steering Committee. If no objection is raised, the action is considered final. State DOTs will incorporate the TIP into their STIPs and submit them to their federal partners for approval. Following federal approval of the amendments, TPB staff will add the approval date to the plan revision which will show on the Public Project InfoTrak website. The public has the opportunity to comment at all the TPB's regular meetings, and can provide written comments at any time.

Administrative modifications are handled by TPB staff and do not undergo separate public engagement. The administrative modification and amendment actions will be posted to the Public Project InfoTrak website after they have been approved.

In cases where a project sponsor requests an amendment to the MTP to include new project(s) that require an update to the air quality conformity analysis (40 CFR §§ 93.126 and 93.127), the TPB will review the proposal, air quality analysis results, any public comments received and then vote on the amendment. At a minimum, the public will have the opportunity to comment during a

[1] National Capital Region Transportation Planning Board (October 20, 2020). *Public Participation Plan.* https://www.mwcog.org/documents/2020/10/21/tpb-participation-plan--outreach-public-comment-tpb

formal comment period prior to the TPB's vote on the amendment and at the beginning of any TPB meeting where the project is being discussed.

DEFINING AMENDMENTS, ADMINISTRATIVE MODIFICATIONS, AND TECHNICAL CORRECTIONS

Amendments

MTP amendments entail major changes that could impact financial constraint, air quality conformity, or other content determined to be significant by TPB staff for review by the TPB.

Amendments to the TIP are any major changes to projects or programs (TIP records) included in the TIP that exceed the parameters for administrative modifications, as defined in the following section. Major changes to records can include:

- Addition or deletion of a record or a discrete project phase;
- Major change in the record cost that exceeds the thresholds listed in the administrative modifications below;
- Major change in design concept or design scope as listed in the project description and project type (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);
- Merits air quality conformity analysis – including if an existing project changes in scope so that the project qualifies for conformity analysis and becomes non-exempt per Transportation Conformity Rule, (40 CFR §§ 93.126 and 93.127) or changes project completion date so that it changes the conformity year.

Administrative Modifications

Administrative modifications (also called "Modifications" or "Ad-Mods") are minor changes to projects or programs (TIP records) included in the TIP that do any one or more of the actions listed below.

1. Revise a project or program (TIP record) description without impacting conformity or conflicting with the environmental document;
2. Change the source of funds;
3. Change the program year of funds within the TIP years;
4. Moving funding for the years outside of the TIP where the total cost does not change;
5. Change the lead agency for a project or program;
6. Split or combine individually listed projects/programs so long as schedule and scope are unchanged, and as long as the funding amounts stay within the guidelines in number seven (7), below;
7. Add or delete component projects from project grouping records or associated component project information, so long as the total project grouping funding amount stays within the guidelines in number seven (7), below; or
8. Revise the total cost listed for a TIP record subject to the applicable definition of the funding limitations adopted by DDOT, MDOT, and VDOT/DRPT for their respective STIPs.
    a. For projects to be included in the DDOT STIP, the additional funding is limited to 25% of the total cost.
    b. For projects to be included in the MDOT STIP, any change to funding amounts is limited based upon a sliding scale that varies by the total cost as follows:
        - If the total cost is less than $5 million, a Modification shall be used for an increase or decrease in cost of up to 50% of the total cost

- If the total cost is greater than$5 million but less than 20 million, a Modification shall be used for an increase or decrease in cost up to 30% of the total cost.
- If the total cost is greater than $20 million, a Modification shall be used for an increase or decrease of cost up to 25% of the total project cost.

c. For projects to be included in the VDOT or DRPT's STIP, the additional funding is limited based upon a sliding scale that varies by funding source and total cost as follows:
   - For transit projects using Federal Transit Administration (FTA) funds:
     - If the Approved STIP total estimated project cost is $2 million or less, a Modification shall be used for an increase of up to 100% of the total cost.
     - If the project cost is greater than $2 million but is $10 million or less, a Modification shall be used for an increase of up to 50% of the total cost.
     - If the project cost is greater than $10 million, a Modification shall be used for an increase of up to 25% of the total project cost
   - For highway projects using Federal Highway Administration (FHWA) funds:
     - If the approved STIP total estimated project cost is $2 million or less a Modification shall be used for an increase of up to 100% of the total cost.
     - If the project cost is greater than $2 million but is $10 million or less, a Modification shall be used for an increase of up to 50% of the total cost.
     - If the project cost is greater than $10 million but is $20 million or less, a Modification shall be used for an increase of up to 25% of the total cost.
     - If the project cost is greater than $20 million but is $35 million or less, a Modification shall be used for an increase of up to 15% of the total cost.
     - If the project cost is greater than $35 million, a Modification shall be used for an increase of up to 10% of the total cost

An administrative modification can be processed to reflect requested changes in accordance with these procedures provided that the existing record does not:

- affect the air quality conformity determination;
- impact financial constraint; and
- require public review and comment.

Technical Corrections

Technical corrections are minor changes in the MTP or TIP that do not require federal approval. These corrections include typographical, grammatical, or syntactical errors that address, for example, an error in spelling, grammar, deletion of a redundant word or formatting that was inadvertently published. It does not include changes to funding amounts. Such changes are handled on a case-by-case basis through agreement between the state and federal agencies and coordinated with the MPOs as necessary.

ESTABLISHING FINANCIAL CONSTRAINT

One of the TPB's primary roles is to verify the financial constraint of the region's MTP and TIP. To do this, the TPB must have accurate estimates for all expenditures planned in the MTP and programmed in the TIP. With hundreds of records of projects and programs in the MTP and TIP and their planned expenditures, the Project InfoTrak database application is the primary tool that the TPB uses to meet this requirement.

As seen in the previous section, one of the most significant factors in determining whether a project or program revision can be processed by administrative modification is the change in total cost. Due to the variety of project and program types included in the MTP and TIP, there is no one-size-fits-all approach to determining the total cost of these records. For the purpose of determining total cost, the records in the Project InfoTrak have been sorted into three categories:

- Discrete Projects
- Project Groupings
- Ongoing Programs

This section explains how those categories and other factors are used to define the total costs of projects and programs so that financial constraint can be verified when revisions are requested.

Defining Record Types and Calculating Total Cost

The three types of MTP and TIP records are defined in Table 2. For the purpose of amending or modifying the TIP, how the total costs for these record types are calculated is described in the following sections.

TABLE 2: RECORD TYPE DEFINITIONS

Discrete Projects	Project Groupings	Ongoing Programs

Any capital activity that has:
• A set scope of work,
• At a specific location with determined limits
• A finite project cost
• Final year of completion
• Typically program funds for
  ○ planning & engineering,
  ○ right-of-way acquisition,
  ○ and construction phases.
	Multiple discrete projects (2 – 300+) that are:
	• Non-regionally significant (NRS) for air quality analysis
	• Sub-projects are similar in type, scope, or primary funding source.
		Operational or capital activities that are:
		• Non-regionally significant (NRS) for air quality analysis
		• Anticipated to continue indefinitely
		• Funded annually at or near the same level, typically adjusted to account for inflation.
		• Sub-projects may be listed individually on the Component Projects tab.

In addition, the TPB utilizes an "Over-Arching Project" or "OAP" record, for records that span both the MTP and TIP. More on OAP records and their total cost calculation is provided later in this section.

Total Cost for Discrete Projects

Ideally, discrete projects would move from the MTP into the TIP as a whole, all at once. Then any discrete project would be entirely in the MTP or entirely in the TIP.

However, sometimes agencies will advance one segment of a larger discrete MTP project into the TIP to begin programming it for construction. There may also be instances where an agency will begin studying, planning, preliminary engineering (PE) or even acquiring rights-of-way (ROW) for projects that are not expected to begin construction until much later.

Whether in the MTP or in the TIP, the total cost for any whole or partial discrete project record should cover the scope of work specifically described in the record's Agency Project Title, Project Type and Description including planning, preliminary engineering, right-of-way acquisition, construction, utilities, and any other capital expenditures through the expected completion of the project. New discrete project records for project segments should include the total cost for the scope of that segment only. Discrete project records for any pre-construction phases should capture the projected cost of that entire phase. This will then be considered the “total cost” for those phases or segments.

The TPB’s Project InfoTrak database application automatically calculates the total cost for each TIP record by adding together these amounts:

- For discrete project records, the sum of all funding in years prior to the current four years of the TIP (shown at the bottom of TIP tables as “Total Prior Costs” funding, (This should equal all prior actual obligations),
- The sum of all planned obligation funds programmed in the current four years of the TIP, and
- For discrete project records, the sum of any reasonably anticipated funding that the implementing agency has scheduled beyond the final year of the TIP to complete a phase or full scope of work (shown at the bottom of TIP tables as “Total Future Cost”).

This calculated “Total Programmed” amount will serve as the “total cost” for that discrete TIP project record. Consistent with practices used in the MTP financial analysis, all funding should be provided in Year-of-Expenditure (YOE) dollars.

Total Cost for Project Groupings

Project Groupings are made up of multiple discrete projects called component projects, all with varying completion dates. Because there is no start or end year for the project grouping, it is not possible to define a reasonable finite total cost as is done with Discrete Projects. Project groupings are ongoing, so **the total cost for project grouping records used for determining amendments or ad-mods is the four-year total programmed in the TIP.** No prior funding or future funding should be entered. The project grouping total cost, because it is the sum of the funding programmed in the four years of the TIP, will not equal the sum of the total cost of its component projects as described below.

Project Groupings utilize the component project tab in Project InfoTrak. Each component project will show its total cost (entered manually and equal to the sum of prior, current four-year planned obligations, and future costs).

To account for all expenditures in the MTP, project groupings should have one TIP record to cover the first four years, and one MTP record that reflects the cost of the grouping beyond the final year of the current TIP through the horizon year of the MTP.

Total Cost for Ongoing Programs

Ongoing programs are anticipated to continue indefinitely with annual expenses. This continuous nature makes calculating a finite **total cost** somewhat arbitrary. **For ongoing program records, the four-year program total will serve as the total cost**. Funds shall be programmed in the four active years of the TIP only. No prior funding or future funding should be entered.

To account for all expenditures in the MTP, ongoing programs should have one TIP record to cover the first four years, and one MTP record that reflects the cost of the program beyond the final year of the current TIP through the horizon year of the MTP.

Total Cost for the TIP and MTP

Total cost is not calculated the same way for MTP records as it is for TIP records. Since no specific funding sources have been allocated to projects in the MTP, prospective revenues need only be “reasonably expected to be available.” The total cost for MTP records is provided by the funding agencies during a plan update. Staff will track the overall total through a simple addition of the expected amounts of federal, state, local, regional, private, or other funding mechanisms listed for the projects. Maintaining the total cost for MTP records as they relate to project records that have been advanced into the TIP is critical for maintaining financial constraint of the plan as well as the TIP. This section discusses how MTP records are eventually advanced, in whole or in part into the TIP, and how those related records are tracked.

Tracking TIP and MTP Records with Over-Arching Projects

A project segment or phase may be advanced into the TIP as an independent discrete project record, so long as there is no change to how the project is reflected in the most recently approved air quality conformity analysis and the action complies with all other federal requirements. A segment or phase can be amended into the TIP through TPB Steering Committee approval. Once phases or segments of a singular discrete MTP project record begin advancing into the TIP, keeping track of these multi-record projects becomes very important for maintaining financial constraint. The TPB's Project InfoTrak system uses a type of super-record called an "Over-Arching Project" or "OAP" record. Project IDs for these records start with "G" to keep track of all records associated with the original MTP project record.

OAP records are useful for Project Grouping and Ongoing Program records as well. MTP records have been established as "companion" records for all Project Grouping and Ongoing Program records to account for the projected expenditures of those records throughout the plan year horizon.

PROCEDURES FOR SUBMITTING AMENDMENT OR ADMINISTRATIVE MODIFICATION REQUESTS

TPB staff will publish a schedule that announces in advance when submissions for MTP or TIP amendments and administrative modifications will be accepted and the associated due dates for data entry and submission of the requests. These dates are subject to change due to unforeseen circumstances, but staff will update the published schedule as far in advance as possible and make every effort to inform the implementing agencies of any such changes. Amendment and administrative modification submissions will not be accepted after the posted due dates, save for extenuating circumstances.

When it becomes necessary for an agency to revise the information for a project in the MTP and/or TIP, the agency will review the type of changes to the project and apply the above definitions to determine if it can be processed by the TPB as an administrative modification or an amendment. For an amendment, the DOT will then submit the project changes to the TPB via a letter to the TPB chair, and for an administrative modification, the DOT will send an email addressed to the TPB Staff Director.

Amendments

At the beginning of each amendment cycle, TPB staff will issue a Call for Amendments. Each agency requesting an MTP or TIP amendment must complete their data entry and submit a signed letter addressed to the Chair of the TPB by the specified deadline. The letter must be very specific for each project/program to justify approval by the TPB. The request letter will:

- Identify why the amendment is being requested,
- Note if successive administrative modifications are triggering the amendment
- Identify funds moving from the MTP (CE record) into the TIP program years,
- Identify if the project/program is a new and not previously included in the MTP,
- Specify funds that are being advanced or deducted by phase in the TIP program years, and
- Identify all sources of funding that would increase or decrease the total cost.

TPB staff will work with agency staff to determine whether that funding was included in the financial analysis of the most recently approved MTP and TIP. The requests will be reviewed by TPB staff, and a determination will be made to either present it to the Steering Committee for approval or go to the full TPB Board.

Under the TPB Bylaws, the Steering Committee "*shall have the full authority to approve non-regionally significant items, and in such cases, it shall advise the TPB of its action*." The Steering Committee will approve the amendment or will recommend that the TPB take up the amendment for action. For agencies requesting an amendment to update its entire section of the TPB's TIP, a 30-day public comment period is required. In such instances, agencies must provide TPB staff with notice at least 60 days in advance to ensure that the amendment can be given adequate time for technical review and be placed on the necessary agendas.

All TPB approved requests for MTP and TIP amendments will be documented for public review on the Public Project InfoTrak website and forwarded to the requesting agency. Upon receipt of the approved amendment, the requesting agency will transmit it to FHWA and/or FTA (depending on the funding sources involved) along with the request for federal approval of an amendment to its STIP.

After approval by FHWA and FTA, the amendment will be incorporated into the DOT's STIP. Upon notification to TPB staff that the amendment has been federally approved, the federal approval date will be added to the TPB's Project InfoTrak database.

Administrative Modifications

In accordance with the posted schedule, TPB staff will announce the opening of each period for accepting administrative modification requests. The TPB has delegated approval of TIP administrative modifications to the TPB Staff Director. Requests for TIP administrative modifications must be submitted via email to the Staff Director or their designee. In the administrative modification request, the submitting agency must explain the following information:

- Why an administrative modification is needed,
- The source of any new funds that increase the project cost below the acceptable TIP thresholds as noted previously, and
- Why the action qualifies as an administrative modification, citing the definitions provided above and the agency's procedures and agreements with FHWA and FTA.

TPB staff will work with agency staff to determine if the funds were included in the most recent financial analysis of the MTP and TIP and if the request meets the definition of administrative modification will be approved and posted in the Project InfoTrak system. Approved TIP administrative modifications will be forwarded to the requested implementing agency for incorporation into its STIP with no federal action required.

Cumulative Administrative Modification Totals

Since administrative modifications are not reviewed and approved by FHWA or FTA, the total cost of the most recent TIP adopted or subsequent amendments is used for determining an administrative modification. Therefore, when calculating the percentage increase in a total cost across successive administrative modification requests, the baseline total cost will always refer to the total cost most recently approved by adoption of, or amendment to the TIP. Once the threshold of successive administrative modifications is reached, the next action taken must be by amendment, regardless of the size of the administrative modification request. This will prevent a situation where successive administrative modification requests would effectively bypass the intended limit to an increase of a project or program's cost without TPB and public review.

DISPUTE RESOLUTION

If a question arises on the interpretation of the definition of an amendment, the TPB, the requesting DOT, FHWA and FTA (the parties) will consult with each other to resolve the question. If after consultation, the parties disagree on the definition of what constitutes an amendment, the final decision will rest with the TPB's federal representative at FTA for transit projects and FHWA for highway projects.