

DOT

FTA

U.S. Department of Transportation

Federal Transit Administration

Application

Federal Award Identification Number (FAIN)	OH-2023-019-02
Temporary Application Number	1225-2023-2
Award Name	ODOT Rural (5311) Facility Grant (2023)
Application Status	Final Concurrence / Reservation
Application Budget Number	0

Period of Performance Start Date	6/14/2023		
Original Period of Performance End Date	3/30/2028		
Current Period of Performance End Date	6/30/2028	Revision #: 1	Approved?: No

Part 1: Recipient Information

Name: OHIO DEPARTMENT OF TRANSPORTATION

Recipient ID	Recipient OST Type	Recipient Alias	UEI	DUNS
1225	State Agency	OHIO DEPT. OF TRANSPORTATION	ERAMRH53K2Y7	809174402

Location Type	Address	City	State	Zip
Physical Address	1980 W BROAD ST	COLUMBUS	OH	43223
Mailing Address	1980 WEST BROAD STREET	COLUMBUS	OH	43223

Union Information

Union Name	Ohio Civil Service Employee Association
Address 1	1980 W BROAD ST
Address 2	MAILSTOP 3110
City	COLUMBUS

State	OH
Zipcode	43223
Contact Name	Joachim Bean
Telephone	(614) 387-7631
Fax	
E-mail	joachim.bean@dot.ohio.gov
Website	1980 W Broad St.

Union Name	Ohio Civil Service Employees Association
Address 1	1980 W BROAD ST
Address 2	MAILSTOP 3110
City	COLUMBUS
State	OH
Zipcode	43223
Contact Name	Kierra Branch
Telephone	(614) 387-5190
Fax	
E-mail	kierra.branch@dot.ohio.gov
Website	transportation.ohio.gov/transit

Union Name	AMALGAMATED TRANSIT UNION
Address 1	10000 New Hampshire Avenue
Address 2	
City	Silver Spring
State	MD
Zipcode	20903
Contact Name	John Costa
Telephone	(301) 431-7100
Fax	
E-mail	joinatu@atu.org
Website	

Union Name	INTERNATIONAL ASSOC. OF MACHINISTS & AEROSPACE WORKERS
Address 1	9000 MACHINISTS PLACE
Address 2	
City	UPPER MARLBORO
State	MD
Zipcode	20772
Contact Name	Brian Bryant
Telephone	(301) 967-4500
Fax	

E-mail	info@iamaw.org
Website	
Union Name	TRANSPORT WORKERS UNION OF AMERICA
Address 1	1220 19th Street NW
Address 2	6th Floor
City	Washington
State	DC
Zipcode	20036
Contact Name	Jose Cruz
Telephone	(202) 719-3900
Fax	
E-mail	jcruz@twu.org
Website	
Union Name	UNITED AUTOMOBILE, AEROSPACE AND AGRICULTURAL IMPLEMENT WORKERS
Address 1	1691 Woodlands Dr.
Address 2	
City	Maumee
State	OH
Zipcode	43537
Contact Name	David Green
Telephone	(419) 893-4677
Fax	
E-mail	region2b@uaw.org
Website	

Part 2: Application Information

Title: ODOT Rural (5311) Facility Grant (2023)

FAIN	Application Status	Award Type	Application Cost Center	Date Created	Last Updated Date	From TEAM?
OH-2023-019-02	Final Concurrence / Reservation	Grant	Region 5	3/4/2025	3/4/2025	No

Application Executive Summary

AMENDMENT 2:

ODOT is seeking a grant amendment to use part of the un-obligated FFY2024 Section 5311 funds in the amount of \$8,559,518. To match these additional federal funds at 20% (or greater than 20%, project and ALI dependent), there will be local match in the amount of \$3,808,571 added to the grant. This federal

funding will be used for facility construction and renovation and related projects. Sources of local match include but are not limited to subrecipient agency (county, city, or nonprofit) funds.

*FFY2024 Section 5311 funds- \$8,559,518
Total FFY2023 Section 5311 Funds Unobligated: \$4,211,304
Total FFY2024 Section 5311 Funds Unobligated: \$24,742,074

Supporting documents attached to the Application Documents section of this grant application include:
-Program of Projects
-Department of Labor Assurance letter
-2024-2027 STIP documentation and approval letter
-Categorical Exclusion & Section 106 Approval

All projects in this grant are included in the 5311 group projects listed in Chapter 9 of the STIP in Figure 9.1.

AMENDMENT 1:

ODOT is seeking a grant amendment to use part of the un-obligated FFY2023 Section 5311 funds in the amount of \$2,111,301. To match these additional federal funds at 20%, there will be local match in the amount of \$527,827 added to the grant. This federal funding will be used for facility construction and related projects for Perry County. Sources of local match include but are not limited to agency funds.

*FFY2023 Section 5311 funds- \$2,111,301
Total FFY2023 Section 5311 Funds Unobligated: \$4,926,132

Supporting documents attached to the Application Documents section of this grant application include:
-Program of Projects
-Department of Labor Assurance letter
-2024-2027 STIP documentation and approval letter
-Categorical Exclusion & Section 106 Approval

All projects in this grant are included in the 5311 group projects listed in Chapter 9 of the STIP in Figure 9.1.

ORIGINAL:

This grant will use FFY2022 Section 5311 rural funds in the amount of \$1,270,323 for RTC Industries facility renovations, project administration and the purchase of office equipment. State match in the amount of \$254,065 will be Transportation Development Credits (TDC). The total amount of funds in this grant will be \$1,270,323. The attached POP provides a list of individual projects that make up this request.

- 5311 rural FFY2022 = \$1,270,323
- TDC 20% State match = \$254,065

Supporting documents attached to the Application Documents section of this grant application include:
Program of Projects
Department of Labor Assurance letter
2021-2024 STIP documentation and approval letter
TDC Letter

All projects on this grant are included in the 5311 group projects listed in Chapter 9 of the STIP and in Figure 9.5 & 9.6.

In addition to FTA's Buy America requirements under 49 U.S.C. 5323(j) and 49 CFR Part 661, which require that the steel, iron, and manufactured goods used in an FTA-funded project are produced in the United States, the Build America, Buy America Act (BABA) (Public Law 117-58, div. G 70914(a)) now

requires that construction materials used in infrastructure projects are also produced in the United States. Refer to terms and conditions in FTA's Master Agreement, Section 15. The BABA requirements for construction materials applies to this grant, in addition to the Buy America requirements, except to the extent a waiver of either requirement may apply.

Frequency of Milestone Progress Reports (MPR)

Annual

Frequency of Federal Financial Reports (FFR)

Annual

Does this application include funds for research and/or development activities?

This award does not include research and development activities.

Pre-Award Authority

This award is not using Pre-Award Authority.

Does this application include suballocation funds?

Recipient organization is the Designated Recipient and can apply for and receive these apportioned funds.

Will this Grant be using Lapsing Funds?

No, this Grant does not use Lapsing Funds.

Will indirect costs be applied to this application?

This award does not include an indirect cost rate.

Indirect Rate Details: N/A

Requires E.O. 12372 Review

No, this application does not require E.O. 12372 Review.

Delinquent Federal Debt

No, my organization does not have delinquent federal debt.

Award Description

Purpose

Original and Amendments:

Provide funding to support rural public transit facilities.

Activities to be performed:

Original and Amendments:

Engineering & Design, Acquisition, Construction, and Rehab/Renovation of facilities and related equipment.

Expected outcomes:

Original and Amendments:

New and updated Rural Administration and Maintenance facilities.

Intended beneficiaries:

Original and Amendments:

Ohio's rural residents and Rural 5311 sub-recipients

Subrecipient Activities:

Original and Amendments:

All the work under this grant will be performed by the various sub-recipients who will be outlined in the program of projects.

Application Point of Contact Information

First Name	Last Name	Title	E-mail Address	Phone
William	Wheeler	Transportation Program Specialist	William.Wheeler@dot.gov	(312) 353-2639
Alex	Ewers	Federal Grants Manager	alex.ewers@dot.ohio.gov	(614) 728-5629

Application Budget Control Totals

Funding Source	Section of Statute	CFDA Number	Amount
5311 - Rural Area Formula	5311-1A	20509	\$11,941,142
Local			\$4,336,397
Local/In-Kind			\$0
State			\$0
State/In-Kind			\$0
Other Federal			\$0
Transportation Development Credit			\$254,065
Adjustment			\$0
Total Eligible Cost			\$16,277,539

Application Budget

Project Number	Budget Item	FTA Amount	Non-FTA Amount	Total Eligible Amount	Quantity
OH-2023-019-01-02 600-00 (600-A1)	OTHER PROGRAM COSTS	\$1,270,323.00	\$0.00	\$1,270,323.00	3
OH-2023-019-01-02	11.42.20 ACQUIRE - MISC SUPPORT EQUIPMENT	\$60,000.00	\$0.00	\$60,000.00	1
OH-2023-019-01-02	11.44.03 REHAB/ RENOVATE - ADMIN/MAINT FACILITY	\$1,095,323.00	\$0.00	\$1,095,323.00	1
OH-2023-019-01-02	11.79.00 PROJECT ADMINISTRATION	\$115,000.00	\$0.00	\$115,000.00	1

OH-2023-019-02-02	600-00 (600-A2)	OTHER PROGRAM COSTS	\$10,670,819.00	\$4,336,397.00	\$15,007,216.00	10
OH-2023-019-02-02	11.41.03	ENG/DESIGN - ADMIN/ MAINTENANCE FACILITY	\$65,600.00	\$16,400.00	\$82,000.00	2
OH-2023-019-02-02	11.42.20	ACQUIRE - MISC SUPPORT EQUIPMENT	\$330,279.00	\$82,570.00	\$412,849.00	3
OH-2023-019-02-02	11.43.03	CONSTRUCT - ADMIN/MAINT FACILITY	\$3,059,294.00	\$764,824.00	\$3,824,118.00	2
OH-2023-019-02-02	11.43.03	CONSTRUCT - ADMIN/MAINT FACILITY	\$7,104,797.00	\$3,444,890.00	\$10,549,687.00	2
OH-2023-019-02-02	11.79.00	PROJECT ADMINISTRATION	\$110,849.00	\$27,713.00	\$138,562.00	1

Discretionary Allocations

This application does not contain discretionary allocations.

Part 3: Project Information

Project Title: Facilities projects with TDC

Project Number	Temporary Project Number	Date Created	Start Date	End Date
OH-2023-019-01-02	1225-2023-2-P1	3/4/2025	6/15/2023	6/30/2025

Project Description

Amendment 2: No Changes

This project represents the RTC Industries facility projects that will include Toll Development Credits.

Project Benefits

The scope will include project management, acquisition of furniture, and rehab/renovation of the existing RTC Industries rural transit facility.

Additional Information

ODOT expects a completely functional transit administration and maintenance facility.

Location Description

Logan County Ohio

Project Location (Urbanized Areas)

UZA Code	Area Name
390000	Ohio

Congressional District Information

District	State
4	Ohio

Program Plan Information

STIP/TIP

Date: 7/1/2020

Description: SFY 2021 - 2024 STIP Approval Letter

UPWP

Date: N/A

Description: N/A

Long Range Plan

Date: N/A

Description: N/A

Project Control Totals

Funding Source	Section of Statute	CFDA Number	Amount
5311 - Rural Area Formula	5311-1A	20509	\$1,270,323
Local			\$0
Local/In-Kind			\$0
State			\$0
State/In-Kind			\$0
Other Federal			\$0
Transportation Development Credit			\$254,065
Adjustment			\$0
Total Eligible Cost			\$1,270,323

Project Budget

Project Number	Budget Item	FTA Amount	Non-FTA Amount	Total Eligible Amount	Quantity
OH-2023-019-01-02	600-00 (600-A1) OTHER PROGRAM COSTS	\$1,270,323.00	\$0.00	\$1,270,323.00	3
OH-2023-019-	11.42.20 ACQUIRE - MISC	\$60,000.00	\$0.00	\$60,000.00	1

01-02		SUPPORT EQUIPMENT				
OH-2023-019-01-02	11.44.03	REHAB/ RENOVATE - ADMIN/MAINT FACILITY	\$1,095,323.00	\$0.00	\$1,095,323.00	1
OH-2023-019-01-02	11.79.00	PROJECT ADMINISTRATION	\$115,000.00	\$0.00	\$115,000.00	1

Project Budget Activity Line Items

Budget Activity Line Item: 11.79.00 - PROJECT ADMINISTRATION

Scope Name / Code	Line Item #	Line Item Name	Activity	Quantity
OTHER PROGRAM COSTS (600-00)	11.79.00	PROJECT ADMINISTRATION	OTHER CAPITAL ITEMS (BUS)	1

Extended Budget Description

ODOT will use \$115,000 of FY-2022 Section 5311 funds to support the County's participation in the Logan County RTC facility renovation. These funds will support the County's expenses for managing the grant funds and project administration. This project is included in the 5311 group projects listed in Chapter 9 of the STIP and in Figure 9.5 & 9.6. PD# 117736

This ALI will use TDC in the amount of \$23,000.

Will 3rd Party contractors be used to fulfill this activity line item?

No, 3rd Party Contractors will not be used for this line item.

Funding Source	Section of Statute	CFDA Number	Amount
5311 - Rural Area Formula	5311-1A	20509	\$115,000
Local			\$0
Local/In-Kind			\$0
State			\$0
State/In-Kind			\$0
Other Federal			\$0
Transportation Development Credit			\$23,000
Adjustment			\$0
Total Eligible Cost			\$115,000

Milestone Name	Est. Completion Date	Description
Logan County Contract Award Date	6/15/2023	Contract awarded to County Commissioners for project administration
Logan County Contract End Date	3/31/2025	End of period of performance for project administration

Final Expenditure	6/30/2025	Final expenditure received from County Commissioners for project administration
-------------------	-----------	---

Budget Activity Line Item: 11.42.20 - ACQUIRE - MISC SUPPORT EQUIPMENT

Scope Name / Code	Line Item #	Line Item Name	Activity	Quantity
OTHER PROGRAM COSTS (600-00)	11.42.20	ACQUIRE - MISC SUPPORT EQUIPMENT	ACQUISITION OF BUS SUPPORT EQUIP/FACILITIES	1

Extended Budget Description

ODOT will use \$60,000 of FY-2022 Section 5311 funds to purchase furniture for the Logan County RTC facility. This specifically includes Office chairs, Desks, Training Room Chairs, Training Room Desk, and miscellaneous equipment to support admin and operations for the Logan County RTC facility. The useful life of the office equipment will be for 7 years. This project is included in the 5311 group projects listed in Chapter 9 of the STIP and in Figure 9.5 & 9.6. PD# 117736

Will 3rd Party contractors be used to fulfill this activity line item?

Yes, 3rd Party Contractors will be used for this line item.

Funding Source	Section of Statute	CFDA Number	Amount
5311 - Rural Area Formula	5311-1A	20509	\$60,000
Local			\$0
Local/In-Kind			\$0
State			\$0
State/In-Kind			\$0
Other Federal			\$0
Transportation Development Credit			\$12,000
Adjustment			\$0
Total Eligible Cost			\$60,000

Milestone Name	Est. Completion Date	Description
Logan County RTC facility office Equipment Contract(s) Award Date	7/1/2023	Logan County RTC facility office Equipment Contract(s) Award Date
Logan County office Equipment Contract(s) End Date	12/31/2024	This is the completion of all contracts for miscellaneous office equipment
Final Expenditure	3/31/2025	The final expenditure for RTC's purchase of miscellaneous office equipment

Budget Activity Line Item: 11.44.03 - REHAB/RENOVATE - ADMIN/MAINT FACILITY

Scope Name / Code	Line Item #	Line Item Name	Activity	Quantity
OTHER PROGRAM	11.44.03	REHAB/RENOVATE -	REHAB/RENOVATE BUS	1

COSTS (600-00)

ADMIN/MAINT FACILITY SUPPORT FACIL/EQUIP

Extended Budget Description

ODOT will use \$1,095,320 of FY-2022 Section 5311 funds to renovate and rehab the existing RTC Transit Admin/Maintenance Facility for Logan County Ohio. The facility is located at 315 W Auburn Ave, Bellefontaine, OH 43311. Funding will be used for construction related activities required to bring the building back to a state of good repair from damages caused by flooding. The construction related activities include:

- Drywall or Block (for water resistance) for approximately 3 feet of wall space from the floor, insulation, and paint because the entire facility has water damage,
- New flooring throughout the building,
- Automatic Door Openers,
- Plumbing work,
- Restroom fixtures, toilets, urinals,
- Electrical work,
- HVAC,
- Ceiling Tiles,
- Roof for entire building, soffit, fascia,
- Outside lighting on building and parking lot lights,
- Inside lighting and fixtures due to roof leaks.

Categorical Exclusion Type 08: Maintenance, Rehab, Construction of Facilities has been identified for the Logan County RTC facility Rehab. The rehab does not include substantial or complete renovation. This is to repair the damages; therefore, the useful life of the facility will remain at 39 years. This project is included in the 5311 group projects listed in Chapter 9 of the STIP and in Figure 9.5 & 9.6. PD# 117736

Will 3rd Party contractors be used to fulfill this activity line item?

Yes, 3rd Party Contractors will be used for this line item.

Funding Source	Section of Statute	CFDA Number	Amount
5311 - Rural Area Formula	5311-1A	20509	\$1,095,323
Local			\$0
Local/In-Kind			\$0
State			\$0
State/In-Kind			\$0
Other Federal			\$0
Transportation Development Credit			\$219,065
Adjustment			\$0
Total Eligible Cost			\$1,095,323

Milestone Name	Est. Completion Date	Description
Logan County Construction RFP	6/15/2023	The date Logan County Commissioners will post the RFP for construction services.
Logan County Construction Contract Awarded	7/1/2023	The date Logan County awards a construction contract to a contractor.
Logan County Contractor Start Date	8/1/2023	Estimated start date for Logan County RTC to award contract for rehab.

Logan County Contractor End Date	12/31/2024	Estimated completion of rehab work by the contractor
Final Expenditure	3/31/2025	Final Expenditure for rehab construction

Project Environmental Findings

Finding: Class II(c) - Categorical Exclusions (C-List)

Class Level Description

Class II(c) consists of projects that do not have a significant environmental impact on the human or natural environment and are therefore categorically excluded from the requirement to prepare an environmental assessment or an environmental impact statement. FTA requires a sufficient project description to support a CE determination. The project may require additional documentation to comply with other environmental laws.

Categorical Exclusion Description

Type 04: Planning and administrative activities which do not involve or lead directly to construction, such as: training, technical assistance and research; promulgation of rules, regulations, directives, or program guidance; approval of project concepts; engineering; and operating assistance to transit authorities to continue existing service or increase service to meet routine demand.

Date Description	Date
Class IIc CE Approved	1/24/2023

Scope Name / Code	Line Item Number	Line Item Name	Quantity	FTA Amount	Total Eligible Cost
OTHER PROGRAM COSTS (600-00)	11.79.00	PROJECT ADMINISTRATION	1	\$115,000.00	\$115,000.00

Finding: Class II(c) - Categorical Exclusions (C-List)

Class Level Description

Class II(c) consists of projects that do not have a significant environmental impact on the human or natural environment and are therefore categorically excluded from the requirement to prepare an environmental assessment or an environmental impact statement. FTA requires a sufficient project description to support a CE determination. The project may require additional documentation to comply with other environmental laws.

Categorical Exclusion Description

Type 07: Acquisition, installation, rehabilitation, replacement, and maintenance of vehicles or equipment, within or accommodated by existing facilities, that does not result in a change in functional use of the facilities, such as: equipment to be located within existing facilities and with no substantial off-site impacts; and vehicles, including buses, rail cars, trolley cars, ferry boats and people movers that can be accommodated by existing facilities or by new facilities that qualify for a categorical exclusion.

Date Description	Date
Class IIc CE Approved	1/24/2023

Scope Name / Code	Line Item	Line Item Name	Quantity	FTA	Total Eligible
-------------------	-----------	----------------	----------	-----	----------------

	Number			Amount	Cost
OTHER PROGRAM COSTS (600-00)	11.42.20	ACQUIRE - MISC SUPPORT EQUIPMENT	1	\$60,000.00	\$60,000.00

Finding: Class II(c) - Categorical Exclusions (C-List)

Class Level Description

Class II(c) consists of projects that do not have a significant environmental impact on the human or natural environment and are therefore categorically excluded from the requirement to prepare an environmental assessment or an environmental impact statement. FTA requires a sufficient project description to support a CE determination. The project may require additional documentation to comply with other environmental laws.

Categorical Exclusion Description

Type 08: Maintenance, rehabilitation, and reconstruction of facilities that occupy substantially the same geographic footprint and do not result in a change in functional use, such as: improvements to bridges, tunnels, storage yards, buildings, stations, and terminals; construction of platform extensions, passing track, and retaining walls; and improvements to tracks and railbeds.

Date Description	Date
Class IIc CE Approved	1/24/2023

Scope Name / Code	Line Item Number	Line Item Name	Quantity	FTA Amount	Total Eligible Cost
OTHER PROGRAM COSTS (600-00)	11.44.03	REHAB/RENOVATE - ADMIN/MAINT FACILITY	1	\$1,095,323.00	\$1,095,323.00

Project Title: Facility Projects (No TDC)

Project Number	Temporary Project Number	Date Created	Start Date	End Date
OH-2023-019-02-02	OH-2023-019-01-P2	3/4/2025	8/30/2024	12/15/2027

Project Description

Original and Amendments:

This FTA-project represents all the facility projects that will not have TDC. All the activities within this project will have a local match component.

Project Benefits

Original and Amendments:

Improvements and replacement of existing admin and maintenance facilities will allow the sub-recipients to better and more efficiently manage their vehicles and operations. A few projects will include some space for customer service to help improve the way these agencies work with their customers.

Additional Information

Amendment 2:

Note, separate versions of the 11.43.03 ALI for facility construction projects are created in TrAMS due to the differing categorical exclusions used for approvals. Specifically, the projects for Ashland and Knox are under 1 ALI, and the projects for Perry and Columbiana are under a different version of the ALI.

Location Description

This project will include investments in the following counties: Perry, Ashland, Columbiana, and Knox.

Project Location (Urbanized Areas)

UZA Code	Area Name
390000	Ohio

Congressional District Information

District	State
1	Ohio
2	Ohio
3	Ohio
4	Ohio
5	Ohio
6	Ohio
7	Ohio
9	Ohio
10	Ohio
11	Ohio
13	Ohio
14	Ohio
15	Ohio
12	Ohio
8	Ohio

Program Plan Information

STIP/TIP

Date: 3/20/2025

Description: Ohio 2024-2027 STIP Administrative Modification.

UPWP

Date: N/A

Description: N/A

Long Range Plan

Date: N/A

Description: N/A

Project Control Totals

Funding Source	Section of Statute	CFDA Number	Amount
5311 - Rural Area Formula	5311-1A	20509	\$10,670,819
Local			\$4,336,397
Local/In-Kind			\$0

State			\$0
State/In-Kind			\$0
Other Federal			\$0
Transportation Development Credit			\$0
Adjustment			\$0
Total Eligible Cost			\$15,007,216

Project Budget

Project Number	Budget Item	FTA Amount	Non-FTA Amount	Total Eligible Amount	Quantity
OH-2023-019-02-02	600-00 (600-A2) OTHER PROGRAM COSTS	\$10,670,819.00	\$4,336,397.00	\$15,007,216.00	10
OH-2023-019-02-02	11.41.03 ENG/DESIGN - ADMIN/ MAINTENANCE FACILITY	\$65,600.00	\$16,400.00	\$82,000.00	2
OH-2023-019-02-02	11.42.20 ACQUIRE - MISC SUPPORT EQUIPMENT	\$330,279.00	\$82,570.00	\$412,849.00	3
OH-2023-019-02-02	11.43.03 CONSTRUCT - ADMIN/MAINT FACILITY	\$3,059,294.00	\$764,824.00	\$3,824,118.00	2
OH-2023-019-02-02	11.43.03 CONSTRUCT - ADMIN/MAINT FACILITY	\$7,104,797.00	\$3,444,890.00	\$10,549,687.00	2
OH-2023-019-02-02	11.79.00 PROJECT ADMINISTRATION	\$110,849.00	\$27,713.00	\$138,562.00	1

Project Budget Activity Line Items

Budget Activity Line Item: 11.43.03 - CONSTRUCT - ADMIN/MAINT FACILITY

Scope Name / Code	Line Item #	Line Item Name	Activity	Quantity
OTHER PROGRAM COSTS (600-00)	11.43.03	CONSTRUCT - ADMIN/ MAINT FACILITY	CONSTRUCTION OF BUS SUPPORT EQUIP/FACIL	2

Extended Budget Description

Amendment 2-New ALI:

This amendment will add FFY2024 Section 5311 funds in the amount of \$7,104,797 as well as local match in the amount of \$3,444,890. Note, the local match for this ALI exceeds 20% as due to amount awarded to Knox in comparison to overall project cost. These funds will be used for the construction of the admin/maintenance facility for Knox and Ashland. Project details can be found in the attached program of projects.

Knox

The proposed project is to construct an 8,100 square feet (sf) Transit Community Center that includes a transit facility and administrative offices, a 7,000 square foot (sf) Vehicle Maintenance Facility and a 28,800 sf Transit Vehicle Storage Facility that will accommodate the current needs of Knox Area Transit and allow room for future growth. This project will be on two separate parcels, located approximately 528 feet from each other. The project scope includes 60,900 sf of asphalt paving, 1,100 linear feet of fencing, landscaping, and site work.

-The Transit Community Center will be located at 503 West High Street in Mount Vernon, Ohio and includes the following components:

--Construction of an 8,100 square foot (sf) transit and administrative office facility.

--Twenty (20) Parking spaces on a 7,800 sf parking lot.

--Customer and pedestrian amenities.

-The Vehicle Maintenance and Transit Vehicle Storage Facility will be located at 601 West Chestnut Street in Mount Vernon, Ohio and include the following components:

-Construction of a 7,000 sf vehicle maintenance facility.

-Thirty-three (33) parking spaces in a 24,300 sf ungated lot.

-Construction of a 28,800 sf open-air, gated, secured lot.

-This includes a 10-bay canopy that will cover up to 20 transit vehicles.

-Thirty-one (31) parking spaces with a secured 805 sf fence.

Ashland

Proposed project is to construct a 14,500 square foot (sf) transit facility within the City of Ashland, Ohio in the light industrial and commercial area at the Northeast Corner of Union Street and East 3rd Street, Ashland, Ohio 44805. This site is currently vacant and owned by the City of Ashland. This transit facility will accommodate the administrative, operational, training, vehicle maintenance, and storage needs of the system. A dedicated transit facility will provide increased safety for staff, increased useful life for vehicles, and room to expand transit services to the community. This will be the sole transit facility for APT.

-The new transit facility will have:

--An administrative area approximately 2,300 sf and contain:

--A waiting room with one ADA-accessible public restroom for public transit customers who may come to the facility for training, loading value to their fare card, or waiting for a transit trip.

--Two private administration offices and an open office floor space for additional administrative staff members. APT has 13 full-time employees and 4 part-time employees, with typically no more than 10 employees working at any one time.

--One woman's and one man's ADA-accessible restroom for staff.

--One training room for the necessary operator and administrative training. The space will also be used for customer travel training.

--A utility, storage, and Informational Technology closet for equipment.

--20 parking spaces, with one ADA accessible, and 5 spaces available for bus parking. These outdoor bus parking spaces will be for daytime pick up and drop off, and not for bus storage overnight.

-A maintenance and storage garage that is approximately 12,200 sf that contains:

--20 bus bays that are 22 wide by 248 deep.

--One mechanic bay

--One wash bay

The useful life for these facilities will be 40 years.

Categorical exclusion determination and Section 106 consultation for these projects has been completed

as of January 28, 2025.

All projects are on PID 112531 and are part of the 5311 statewide group project list as outlined in Chapter 9 of the STIP.

Will 3rd Party contractors be used to fulfill this activity line item?

Yes, 3rd Party Contractors will be used for this line item.

Funding Source	Section of Statute	CFDA Number	Amount
5311 - Rural Area Formula	5311-1A	20509	\$7,104,797
Local			\$3,444,890
Local/In-Kind			\$0
State			\$0
State/In-Kind			\$0
Other Federal			\$0
Transportation Development Credit			\$0
Adjustment			\$0
Total Eligible Cost			\$10,549,687

Milestone Name	Est. Completion Date	Description
Subrecipient Contract Completion	6/15/2025	ODOT contract with subrecipient will be executed.
Subrecipient Vendor ITB	4/15/2026	Subrecipient Invitation to Bid for vendor for construction will be issued.
Subrecipient Vendor Contract	5/15/2026	Subrecipient contract with vendor will be executed.
Construction Begins	6/15/2026	Facility construction begins.
Construction Ends	9/15/2027	Facility construction ends.
Final Drawdown & Closeout	12/15/2027	Subrecipient will draw down final reimbursement and project will be closed.

Budget Activity Line Item: 11.42.20 - ACQUIRE - MISC SUPPORT EQUIPMENT

Scope Name / Code	Line Item #	Line Item Name	Activity	Quantity
OTHER PROGRAM COSTS (600-00)	11.42.20	ACQUIRE - MISC SUPPORT EQUIPMENT	ACQUISITION OF BUS SUPPORT EQUIP/FACILITIES	3

Extended Budget Description

AMENDMENT 2-New ALI:

This ALI will use FFY2024 Section 5311 funds in the amount of \$330,279 as well as 20% local match in the amount of \$82,570. These funds will be used for the purchase of miscellaneous office equipment for multiple agencies. Project details can be found in the attached program of projects.

The useful life of this equipment will be 7 years.

All projects are on PID 112531 and are part of the 5311 statewide group project list as outlined in Chapter 9 of the STIP.

Will 3rd Party contractors be used to fulfill this activity line item?

Yes, 3rd Party Contractors will be used for this line item.

Funding Source	Section of Statute	CFDA Number	Amount
5311 - Rural Area Formula	5311-1A	20509	\$330,279
Local			\$82,570
Local/In-Kind			\$0
State			\$0
State/In-Kind			\$0
Other Federal			\$0
Transportation Development Credit			\$0
Adjustment			\$0
Total Eligible Cost			\$412,849

Milestone Name	Est. Completion Date	Description
Subrecipient Contract Completion	6/15/2025	ODOT contract with subrecipient will be executed.
Subrecipient Vendor Contract	7/15/2026	Subrecipient contract with vendor for equipment purchase will be executed.
Project Completion	11/15/2026	Equipment project will be completed.

Budget Activity Line Item: 11.79.00 - PROJECT ADMINISTRATION

Scope Name / Code	Line Item #	Line Item Name	Activity	Quantity
OTHER PROGRAM COSTS (600-00)	11.79.00	PROJECT ADMINISTRATION	OTHER CAPITAL ITEMS (BUS)	1

Extended Budget Description

AMENDMENT 2-No changes

AMENDMENT 1-New ALI:

This ALI will use FFY2023 Section 5311 funds in the amount of \$110,849 as well as 20% local match in the amount of \$27,713. These funds will be used for project management and oversight for the construction of the admin/maintenance facility for Perry County. Project details can be found in the attached program of projects.

All projects are on PID 112531 and are part of the 5311 statewide group project list as outlined in Chapter 9 of the STIP. 2024-2027 STIP Administrative Modification 5/16/2024

Will 3rd Party contractors be used to fulfill this activity line item?

Yes, 3rd Party Contractors will be used for this line item.

Funding Source	Section of Statute	CFDA Number	Amount
----------------	--------------------	-------------	--------

5311 - Rural Area Formula	5311-1A	20509	\$110,849
Local			\$27,713
Local/In-Kind			\$0
State			\$0
State/In-Kind			\$0
Other Federal			\$0
Transportation Development Credit			\$0
Adjustment			\$0
Total Eligible Cost			\$138,562

Milestone Name	Est. Completion Date	Description
Subrecipient Contract Completion	8/30/2024	ODOT contract with subrecipient will be executed.
Subrecipient Vendor Contract	12/31/2024	Subrecipient contract with vendors will be executed.
Final Drawdown & Closeout	11/30/2026	Subrecipient will draw down final reimbursement and project will be closed.

Budget Activity Line Item: 11.41.03 - ENG/DESIGN - ADMIN/MAINTENANCE FACILITY

Scope Name / Code	Line Item #	Line Item Name	Activity	Quantity
OTHER PROGRAM COSTS (600-00)	11.41.03	ENG/DESIGN - ADMIN/ MAINTENANCE FACILITY	ENGINEERING & DESIGN - BUS SUPPORT EQUIP/FACIL	2

Extended Budget Description

Amendment 2:

This amendment will add FFY2024 Section 5311 funds in the amount of \$40,000 as well as 20% local match in the amount of \$10,000 such that the total amounts will be \$65,600 federal and \$16,400 local. These funds will be used for architecture, engineering, design and permitting for the admin/maintenance facility for Columbiana. Project details can be found in the attached program of projects.

Updated Milestones are as follows:

- Subrecipient Contract Completion: 6/15/2025
- Subrecipient Vendor Contract: 10/15/2025
- Design Completion: 1/15/2026
- Final Drawdown & Closeout: 4/15/2026

All projects are on PID 112531 and are part of the 5311 statewide group project list as outlined in Chapter 9 of the STIP.

AMENDMENT 1-New ALI:

This ALI will use FFY2023 Section 5311 funds in the amount of \$25,600 as well as 20% local match in the amount of \$6,400. These funds will be used for architect, engineering, design and permitting for the construction of the admin/maintenance facility for Perry County. Project details can be found in the attached program of projects.

All projects are on PID 112531 and are part of the 5311 statewide group project list as outlined in Chapter 9 of the STIP. 2024-2027 STIP Administrative Modification 5/16/2024

Will 3rd Party contractors be used to fulfill this activity line item?

Yes, 3rd Party Contractors will be used for this line item.

Funding Source	Section of Statute	CFDA Number	Amount
5311 - Rural Area Formula	5311-1A	20509	\$65,600
Local			\$16,400
Local/In-Kind			\$0
State			\$0
State/In-Kind			\$0
Other Federal			\$0
Transportation Development Credit			\$0
Adjustment			\$0
Total Eligible Cost			\$82,000

Milestone Name	Est. Completion Date	Description
Subrecipient Contract Completion	8/30/2024	ODOT contract with subrecipient will be executed.
Subrecipient Vendor Contract	12/31/2024	Subrecipient contract with vendors will be executed.
Design Completion	3/31/2025	Design and related activities are completed.
Final Drawdown & Closeout	6/30/2025	Subrecipient will draw down final reimbursement and project will be closed.

Budget Activity Line Item: 11.43.03 - CONSTRUCT - ADMIN/MAINT FACILITY

Scope Name / Code	Line Item #	Line Item Name	Activity	Quantity
OTHER PROGRAM COSTS (600-00)	11.43.03	CONSTRUCT - ADMIN/ MAINT FACILITY	CONSTRUCTION OF BUS SUPPORT EQUIP/FACIL	2

Extended Budget Description

Amendment 2:

This amendment will add FFY2024 Section 5311 funds in the amount of \$1,084,442 as well as 20% local match in the amount of \$271,110 for a total of \$3,059,294 federal and \$764,824 local. These funds will be used for the construction of the admin/maintenance facility for Columbiana. Project details can be found in the attached program of projects.

Columbiana

The current Community Action Rural Transit System (CARTS) facility is located at 202 1/2 Jackson Street, Lisbon, Ohio 44432, on 1.74 acres of land. It is owned and provided by the Columbiana County Board of Commissioners to the Community Action Agency as the designated grantee for use by the public transit system, CARTS. The existing facility was built in 1988 and was last renovated in 2010. This new project will include a facility renovation and expansion/construction.

Detailed Project Scope:

- Renovate area: 2,233 sf (square feet); new addition: 1,520 sf at Jackson St. Lisbon, OH 44432.
- The addition will include the construction of a new 20'x4' service and 18'x40' wash bay on the east side of the facility, totaling 1,520 sf.
- Repurpose the existing wash bay on the south side of the building into the client waiting area with two restrooms. A new service and wash bay are needed to meet the needs of CAACC, as the current bays are too small. The new location will also create a better separation of divisions of work, cut down on foot traffic within the building, and reduce noise levels.
- The existing breakroom on the north end of the building is being repurposed into three offices and a storage area.
- Two offices will be added within the central core.
- The first service bay is being repurposed into a large meeting room with a kitchenette and the driver's breakroom with a private restroom and kitchenette.
- Create a small office space within the existing tool room for the service supervisor.
- The parking lot will be expanded by an additional 1,770 sf to add seven additional automobile parking spaces. The total new square footage of the parking lot will be 26,319 sf. The addition of the new service bay and wash bay will eliminate three of the 54 existing automobile parking spaces. With the parking lot expansion, there will be a total of 58 automobile parking spaces available.
- The renovation will also include fixing the walls and adding another office under the stairwell.
- There is an existing area of 18,535 sf that is enclosed with fencing. After the expansion of the parking lot, an additional 100 sf will be fenced, with a total area enclosed of 18,635 sf.

Revised Milestones are as follows:

- Subrecipient Contract Completion: 6/15/2025
- Subrecipient Vendor ITB: 4/15/2026
- Subrecipient Vendor Contract: 5/15/2026
- Construction Begins: 6/15/2026
- Construction Ends: 9/15/2027
- Final Drawdown & Closeout: 12/15/2027

The useful life for this facility will be 40 years.

Categorical exclusion determination and Section 106 consultation for this project has been completed as of February 20, 2025.

All projects are on PID 112531 and are part of the 5311 statewide group project list as outlined in Chapter 9 of the STIP.

AMENDMENT 1-New ALI:

This ALI will use FFY2023 Section 5311 funds in the amount of \$1,974,852 as well as 20% local match in the amount of \$493,714. These funds will be used for the construction of the admin/maintenance facility for Perry County. Project details can be found in the attached program of projects.

The useful life of this facility will be 40 years.

Categorical exclusion determination and Section 106 consultation for this project has been completed as of June 14, 2023.

All projects are on PID 112531 and are part of the 5311 statewide group project list as outlined in Chapter 9 of the STIP. 2024-2027 STIP Administrative Modification 5/16/2024

Will 3rd Party contractors be used to fulfill this activity line item?

Yes, 3rd Party Contractors will be used for this line item.

Funding Source	Section of Statute	CFDA Number	Amount
5311 - Rural Area Formula	5311-1A	20509	\$3,059,294
Local			\$764,824
Local/In-Kind			\$0
State			\$0
State/In-Kind			\$0
Other Federal			\$0
Transportation Development Credit			\$0
Adjustment			\$0
Total Eligible Cost			\$3,824,118

Milestone Name	Est. Completion Date	Description
Subrecipient Contract Completion	8/30/2024	ODOT contract with subrecipient will be executed.
Subrecipient Vendor ITB	5/31/2025	Subrecipient Invitation to Bid for vendor for construction will be issued.
Subrecipient Vendor Contract	6/15/2025	Subrecipient contract with vendor will be executed.
Construction Begins	6/30/2025	Facility construction begins.
Construction Ends	8/31/2026	Facility construction ends.
Final Drawdown & Closeout	11/30/2026	Subrecipient will draw down final reimbursement and project will be closed.

Project Environmental Findings

Finding: Class II(c) - Categorical Exclusions (C-List)

Class Level Description

Class II(c) consists of projects that do not have a significant environmental impact on the human or natural environment and are therefore categorically excluded from the requirement to prepare an environmental assessment or an environmental impact statement. FTA requires a sufficient project description to support a CE determination. The project may require additional documentation to comply with other environmental laws.

Categorical Exclusion Description

Type 04: Planning and administrative activities which do not involve or lead directly to construction, such as: training, technical assistance and research; promulgation of rules, regulations, directives, or program guidance; approval of project concepts; engineering; and operating assistance to transit authorities to continue existing service or increase service to meet routine demand.

Date	Description
	Class IIc CE Approved

Scope Name / Code	Line Item	Line Item Name	Quantity	FTA	Total Eligible
-------------------	-----------	----------------	----------	-----	----------------

	Number			Amount	Cost
OTHER PROGRAM COSTS (600-00)	11.79.00	PROJECT ADMINISTRATION	1	\$110,849.00	\$138,562.00

Finding: Class II(c) - Categorical Exclusions (C-List)

Class Level Description

Class II(c) consists of projects that do not have a significant environmental impact on the human or natural environment and are therefore categorically excluded from the requirement to prepare an environmental assessment or an environmental impact statement. FTA requires a sufficient project description to support a CE determination. The project may require additional documentation to comply with other environmental laws.

Categorical Exclusion Description

Type 04: Planning and administrative activities which do not involve or lead directly to construction, such as: training, technical assistance and research; promulgation of rules, regulations, directives, or program guidance; approval of project concepts; engineering; and operating assistance to transit authorities to continue existing service or increase service to meet routine demand.

Date Description	Date
Class IIc CE Approved	

Scope Name / Code	Line Item Number	Line Item Name	Quantity	FTA Amount	Total Eligible Cost
OTHER PROGRAM COSTS (600-00)	11.41.03	ENG/DESIGN - ADMIN/ MAINTENANCE FACILITY	2	\$65,600.00	\$82,000.00

Finding: Class II(c) - Categorical Exclusions (C-List)

Class Level Description

Class II(c) consists of projects that do not have a significant environmental impact on the human or natural environment and are therefore categorically excluded from the requirement to prepare an environmental assessment or an environmental impact statement. FTA requires a sufficient project description to support a CE determination. The project may require additional documentation to comply with other environmental laws.

Categorical Exclusion Description

Type 09: Assembly or construction of facilities that is consistent with existing land use and zoning requirements (including floodplain regulations) and uses primarily land disturbed for transportation use, such as: buildings and associated structures; bus transfer stations or intermodal centers; busways and streetcar lines or other transit investments within areas of the right-of-way occupied by the physical footprint of the existing facility or otherwise maintained or used for transportation operations; and parking facilities.

Date Description	Date
Class IIc CE Approved	6/14/2023

Scope Name / Code	Line Item Number	Line Item Name	Quantity	FTA Amount	Total Eligible Cost
OTHER PROGRAM	11.43.03	CONSTRUCT -	2	\$3,059,294.00	\$3,824,118.00

COSTS (600-00)

ADMIN/MAINT
FACILITY

Finding: Class II(c) - Categorical Exclusions (C-List)

Class Level Description

Class II(c) consists of projects that do not have a significant environmental impact on the human or natural environment and are therefore categorically excluded from the requirement to prepare an environmental assessment or an environmental impact statement. FTA requires a sufficient project description to support a CE determination. The project may require additional documentation to comply with other environmental laws.

Categorical Exclusion Description

Type 07: Acquisition, installation, rehabilitation, replacement, and maintenance of vehicles or equipment, within or accommodated by existing facilities, that does not result in a change in functional use of the facilities, such as: equipment to be located within existing facilities and with no substantial off-site impacts; and vehicles, including buses, rail cars, trolley cars, ferry boats and people movers that can be accommodated by existing facilities or by new facilities that qualify for a categorical exclusion.

Date	Description	Date
	Class IIc CE Approved	

Scope Name / Code	Line Item Number	Line Item Name	Quantity	FTA Amount	Total Eligible Cost
OTHER PROGRAM COSTS (600-00)	11.42.20	ACQUIRE - MISC SUPPORT EQUIPMENT	3	\$330,279.00	\$412,849.00

Finding: Class II(c) - Categorical Exclusions (C-List)

Class Level Description

Class II(c) consists of projects that do not have a significant environmental impact on the human or natural environment and are therefore categorically excluded from the requirement to prepare an environmental assessment or an environmental impact statement. FTA requires a sufficient project description to support a CE determination. The project may require additional documentation to comply with other environmental laws.

Categorical Exclusion Description

Type 13: Federally-funded projects:

- (i) That receive less than \$5,000,000 of Federal funds; or
- (ii) With a total estimated cost of not more than \$30,000,000 and Federal funds comprising less than 15 percent of the total estimated project cost.

Date	Description	Date
	Class IIc CE Approved	

Scope Name / Code	Line Item Number	Line Item Name	Quantity	FTA Amount	Total Eligible Cost
OTHER PROGRAM COSTS (600-00)	11.43.03	CONSTRUCT - ADMIN/MAINT	2	\$7,104,797.00	\$10,549,687.00

FACILITY

Part 4: Fleet Details

No fleet data exists for this application.

Part 5: FTA Review Comments

FTA Comments for DOL

Comment By William Wheeler

Comment Type	DOL Review for Information
--------------	----------------------------

Date	5/1/2025
------	----------

Comment	For your information.
---------	-----------------------

Application Review Comments

Comment By Nathaniel Seeskin

Comment Type	Application Details
--------------	---------------------

Date	4/9/2025
------	----------

Comment

Recipient must comply with all applicable Federal laws and regulations related to this project, including the ADA Standards for Transportation Facilities, based on the U.S. Access Boards ADA Accessibility Guidelines found here: <http://www.access-board.gov/guidelines-and-standards/transportation/facilities/ada-standards-for-transportation-facilities>. The following is a non-exhaustive list of ADA standards that Recipient must comply with. The information provided below is intended as technical assistance and applies only to the project as described. Should the project scope change or new information on the project be provided, FTA may require a re-evaluation of the project information as it relates to ADA and require additional information. This confirmation is not an express or implied promise of project compliance with the ADA.

As required under DOT ADA Standard 206.4.1, Recipient must ensure that 60 percent of all public entrances to the facility will be accessible. If a station has only two entrances, then both must be accessible.

As required under DOT ADA Standard 810.10, for rail projects, Recipient must ensure that no flange way gap can be greater than 2.5 where passenger circulation paths cross tracks at grade (i.e. a street-level pedestrian crossing over streetcar tracks).

As required under DOT ADA Standard 206.3, Recipient must ensure that accessible routes coincide with or are located in the same area as general circulation paths, and elements such as ramps, elevators, and fare vending and collection areas are placed to minimize the distance that wheelchair users and other persons who cannot climb steps must travel in comparison to the general public.

As required under DOT ADA Standard 406.8, Recipient must ensure that curb ramps will have detectable warnings.

As required under DOT ADA Standard 810.2, Recipient must ensure that bus boarding and alighting areas are in compliance with the ADA-ABA Guidelines (Section 810.2), which address surfaces (sturdy); dimensions (96 long x 60 wide); connection to sidewalks, streets, and pedestrian paths; slope (not steeper than 1:48); signs; and public address systems.

As required by DOT ADA Standard 810.5.3, Recipient must ensure that station platforms must be coordinated with the vehicle floor height.

Recipient must comply with all applicable Federal laws and regulations related to this project, including the ADA Standards for Transportation Facilities, based on the U.S. Access Boards ADA Accessibility Guidelines found here: <http://www.access-board.gov/guidelines-and-standards/transportation/facilities/ada-standards-for-transportation-facilities>. The following is a non-exhaustive list of ADA standards that Recipient must comply with. The information provided below is intended as technical assistance and applies only to the project as described. Should the project scope change or new information on the project be provided, FTA may require a re-evaluation of the project information as it relates to ADA and require additional information. This confirmation is not an express or implied promise of project compliance with the ADA.

As required under DOT ADA Standard 201 and DOT ADA Regulation 49 C.F.R. 37.43(a)(1), Recipient must ensure that altered or added portions of the facility must be made accessible.

As required by DOT ADA Regulation 49 C.F.R. 37.43(a)(2) and DOT ADA Standard 202.3, Recipient must ensure that the path of travel to the altered or added portion of the facility must be made accessible, to the maximum extent feasible.

As required by DOT ADA Standard 202.4 and DOT ADA Regulation 49 C.F.R. 37.43(e)(1), if the path of travel cannot be made accessible, Recipient must submit to FTA an analysis demonstrating that the cost of making the path of travel accessible is disproportionate to (i.e., > 20%) the cost of the alterations or additions to the primary function area.

As required by DOT ADA Standard 202.4 and DOT ADA Regulation 49 C.F.R. 37.43(b), if the path of travel cannot be made accessible, Recipient must submit to FTA an analysis demonstrating that site-specific conditions prevent you from making the path of travel accessible. Include relevant diagrams and maps.

Per the current Title VI Circular, Title 49 CFR Section 21.9(b)(3) states, In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part. Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin. In order to comply with the regulations:

a. The recipient shall complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Recipients shall engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the

selection of the preferred site.

b. When evaluating locations of facilities, recipients should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.

c. If the recipient determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the recipient may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. The recipient must show how both tests are met; it is important to understand that in order to make this showing, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.