

# TwinCATS General Program Account (GPA) Policy- Preliminary Draft 8-17-2015

## **What are General Program Accounts?**

Under federal transportation regulations, MPOs and the State DOT may choose to group projects that are not of a significant enough scale to be listed individually in the State Transportation Improvement Program (STIP). Michigan calls these groupings General Program Accounts (GPAs). Some projects with certain worktypes and some phases can be grouped together as GPAs. However, it is important that the grouping of projects not hinder the public participation process in any way. In Michigan, provision of a project list for all projects grouped under a GPA is required, and should be available to any interested parties.

Federal regulations state that GPAs may only be used under the following circumstances:

1. The total project cost for all phases cannot exceed \$5 million.
2. The project cannot be part of a new roads or capacity expansion project.
3. The project cannot be a congressional earmark project.
4. Each project must also be a categorical exclusion and air quality neutral.
5. Right-of-way activities related to the project are limited to grading permits, mutual benefit permits, and minor takings without relocation.

## **Reasons for Establishing a Policy**

The Michigan Department of Transportation has asked Metropolitan Planning Organizations to explore the use of GPAs within their Transportation Improvement Programs (TIP). GPAs offer a way to reduce the amount of time spent on administering the S/TIP, since certain modifications to individual projects would not have to go through the amendment process unless they significantly change the overall GPA grouping. Instead, changes to projects within a GPA would be counted as administrative modifications for the purposes of Federal Highway Administration, and as such, would not have to go through the formal approval process.

Until now, the TwinCATS MPO has not allowed the use of GPAs in the TIP. SWMPC staff have conducted an analysis of current and past projects in the TIP and amendments submitted during the 2011-2014 and 2014-2017 TIP. The number of locally generated projects and amendments is small, and therefore staff believes that there would be little utility gained from using GPAs for local projects.

However, MPO staff acknowledge that there is particular value for using GPAs for MDOT projects. There are often adjustments to MDOT projects that, individually, meet the threshold of an amendment, but as part of MDOT's overall program, are quite minor. The submittal and processing of TIP amendments incurs costs in terms of legal notices and staff time at the regional, state, and federal level. Staff sees a cost-effectiveness improvement in minimizing the number of amendments that need to go through the full state and federal approval process.

At the same time, it is important to the MPO to preserve its oversight function and opportunities for public participation. Having a GPA policy in place ensures that the inclusion of projects within a GPA and any amendments to them are in line with the TwinCATS TIP and Administrative Modification Policy, as passed by the committees in 2013.

## **The Policy**

The MPO proposes that any highway project generated by a local agency (City, Village, or Road Commission) **be ineligible for inclusion in a GPA**. The reasoning behind this proposal is that the TwinCATS MPO receives very limited Surface Transportation Program (STP) funding, and as such, we have a very small number of projects generated by local agencies each year. In addition, the funds only usually go towards funding construction phases. In order to continue to allow for adequate public participation and MPO review of these locally generated projects, it makes sense to individually list the projects.

There still may be value to establishing local Transit GPAs to assist transit agencies in their planning. SWMPC has found that transit agencies struggle to estimate their funding allocations for future years, and these allocations often change throughout a given year. Establishing GPAs for transit would allow agencies to plan a desired program of projects and make minor changes to them more easily. At this time, however, there is still uncertainty about how transit GPAs would interface with the constrained portion of the TIP. Therefore, no transit GPAs are currently included in the policy. Transit GPAs may be added to the Policy at a later date.

The MPO proposes that use of a GPA only be permissible under the following circumstances:

### MDOT Trunkline Bridge Preservation Projects

Staff have found that MDOT trunkline bridge preservation projects tend to be funded late in the fiscal year as MDOT determines that funds are available. These projects are preventative maintenance, and a GPA makes sense so that the projects do not get held up in TIP amendment processing. Staff recommends the establishment of a Trunkline Bridge Preservation GPA.

### MDOT Trunkline Safety Projects

These are usually small projects that are programmed late in the fiscal year to take advantage of bid savings. Many of the projects are extremely small and involve installation of flashers, pavement markings, beacons or signage. The MPO would still have a say in informing the need and location of these types of projects.

### Pre-Construction Phases of MDOT Projects

Staff have found that changes are often made for pre-construction phases (PE, ROW, SUB, UTL), and those changes tend to be relatively small cost changes. Staff recommends the adoption of a Pre-Construction Phase GPA for these projects.

### Rail Safety Projects

Staff have found that these projects tend to be small in cost and are added at the end of the fiscal year as funding becomes available. These are minor work items such as signal flashers or other low-cost improvements. The MPO would still have a say in informing the need and location of these types of projects.

Per MDOT and FHWA Policy, a project list will be attached to each GPA. That list will be made available through SWMPC and will be continually updated by MDOT. All GPA modifications must adhere to the TwinCATS Amendment and Administrative Modification Policy in regards to its classification as an amendment or administrative modification.

TwinCATS MPO 2015 Proposed NFC Change Requests

| Street        | Limits   | Mileage | PR Number | ADT (Year)   | Requested Classification | Previous Classification | Justification  | Jurisdictional Agency          | MAP ID |
|---------------|--|---------|-----------|--------------|--------------------------|-------------------------|--|--------------------------------|--------|
| Maiden Lane   | Lakeshore Drive/Red Arrow Highway to Crestview | 0.584   | 1382202   | 2,242 (2015) | Minor Collector          | Local                   | Increased freight traffic at Bosch manufacturing, Wadsworth Printing, Wolverine Manufacturing, and Auto Specialties. The South shore Raquet Club and the Tennis Lane business park attract automobile traffic. In addition, Maiden Lane serves as a collector of traffic from five separate residential subdivisions.              | Berrien County Road Commission |        |
| Maiden Lane   | Crestview to South Cleveland                   | 0.389   | 1382202   | 1,893 (2015) | Minor Collector          | Local                   | Increased freight traffic at Bosch manufacturing, Wadsworth Printing, Wolverine Manufacturing, and Auto Specialties. The South shore Raquet Club and the Tennis Lane business park attract automobile traffic. In addition, Maiden Lane serves as a collector of traffic from five separate residential subdivisions.              | Berrien County Road Commission |        |
| Momany Drive  | Renaissance Drive to M-63                      | 0.135   | 3111006   | 3,759 (2015) | Minor Collector          | Local                   | Route serves the Edgewater business Park, the Whirlpool Tech Center, and the Coast Guard. It serves as a connection between Upton Drive and M-63.  | City of St. Joseph             |        |
| Momany Drive  | Upton Drive to Renaissance Drive               | 0.201   | 3111006   | 1,193 (2015) | Minor Collector          | Local                   | Route serves the Edgewater business Park, the Whirlpool Tech Center, and the Coast Guard. It serves as a connection between Upton Drive and M-63.  | City of St. Joseph             |        |
| Whitwam Drive | Upton Drive to the St. Joseph City Limits      | 0.58    | 3111208   | 2,804        | Minor Collector          | Local                   | The proposed minor collector route serves the Whirlpool Tech Center, a Coast Guard Station, the Inn at Harbor Shores, and the Lafarge Corporation. It is the main route for people to access the businesses from I-94 and I-94 Business loop. Upcoming residential developments will only increase traffic volume along the route. | City of St. Joseph             |        |

## **Attachment for 8-17-2015 TwinCATS meeting- Past correspondence on US-31**

January 7, 2009

Roberta S. Welke  
Southwest Michigan Region Engineer  
501 E Kilgore Rd  
Kalamazoo, MI 49001

Dear Roberta S. Welke:

I writing on behalf of the Twin Cities Area Transportation Study (TwinCATS) to extend their strong support for the completion of the US 31 connection to I-94 with a full I-94 exit ramp for east-bound I-94 traffic to BL 94 into downtown Benton Harbor. TwinCATS feels it is important that the US-31 completion project be revisited for possible stimulus funding.

TwinCATS believes this project is critical to the economic vitality of Southwest Michigan specifically the City of Benton Harbor. A strengthened connection between I-94 and downtown Benton Harbor will enhance downtown commerce. The connection between US-31 and I-94 will increase the connectivity between northern and southern southwest Michigan and will ensure that the transportation system functions effectively and safely. The completion of US-31 becomes even more significant with the development of Harbor Shores.

TwinCATS hopes you will consider including the US-31 completion project as a priority for alternative funding sources.

A group of TwinCATS representatives would like to meet and discuss MDOT's position, funding options, and TwinCATS role in making US-31 a priority.

Sincerely,

Nickolas Musson  
Transportation Planner  
269.925.1137  
[mussonn@swmpc.org](mailto:mussonn@swmpc.org)



STATE OF MICHIGAN  
DEPARTMENT OF TRANSPORTATION  
LANSING

RICK SNYDER  
GOVERNOR

KIRK T. STEUDLE  
DIRECTOR

February 4, 2013

The Honorable Al Pscholka  
Michigan House of Representatives  
P.O. Box 30014  
Lansing, Michigan 48909

Dear Representative Pscholka:

Thank you for your recent letter regarding proposed improvements to US-31. The completion of the US-31 freeway project in Berrien County remains a long-term priority for the Michigan Department of Transportation (MDOT). The current estimated cost to complete this project is approximately \$92 million.

Since the issuance of the Federal Highway Administration's Record of Decision in 2004, MDOT has been acquiring the necessary right-of-way to complete this project subject to the availability of funds for those purchases. There are approximately nine outstanding properties that need to be acquired, at an estimated cost of \$1.3 million. In addition, there is a major pipeline in the proposed corridor that needs to be relocated before construction can begin. It is estimated that this relocation could take as much as two years to complete.

Over the past decade, MDOT has been focusing on system preservation needs. This strategy has left little funding for new freeway segments. At current state and federal transportation funding levels, this strategy is not likely to change soon. When adequate funding becomes available to meet and sustain MDOT system condition goals, priorities beyond system preservation will be examined. At that point, MDOT's Southwest Region staff believes this project should be divided into three phases. The first phase would be reconfiguring the interchange at the I-94/I-94 business loop, the second phase would be additional improvements to the I-94 corridor in the vicinity of the reconfigured interchange, and the last would be the new US-31 freeway corridor between Napier Road and I-94.

As you are aware, the freeway currently terminates at Napier Avenue, which provides a connection to I-94. This connection is currently performing adequately and meets the mobility needs of the area for the present time. MDOT will continue to monitor traffic operations at US-31/Napier Road and I-94/Napier Road.

If you have any questions, please contact either me or David E. Wresinski, Director, Bureau of Transportation Planning, at 517-373-0343.

Sincerely,

Kirk T. Steudle  
Director

BTP:AMD:HM:gms

bcc: David E. Wresinski

Bob Parsons

William Tansil  
Andy Irwin

Hugh McNichol  
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Governmental Affairs



## SOUTHWEST MICHIGAN PLANNING COMMISSION

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### MEMORANDUM

DATE: August 11, 2015

FROM: MPO Staff

TO: Members of the TwinCATS TAC and Policy Committees

SUBJECT: Proposed Changes to the Transportation Improvement Program (TIP) 2014-2017

The Michigan Department of Transportation (MDOT) is proposing the following amendments to the 2014-2017 TIP:

- 2015- Add PE and SUB phases of I-94 BL (Main St) bridge preservation over the St. Joseph River. PE phase cost is \$14,427 and SUB cost is \$412,571. Total project cost is \$3,155,042.

Construction phase will take place in 2019 and will be added to the Illustrative List.

- 2015- Add PE and SUB phases of M-63 bridge preservation over the St. Joseph River. PE phase cost is \$16,394 and SUB phase cost is \$558,897. Total project cost is \$4,250,762.

Construction phase will take place in 2019 and will be added to the Illustrative List.