

**Air Quality Conformity Analysis  
for  
Berrien County, Michigan 2015 Ozone NAAQS Nonattainment Area  
May 15, 2023**

**Draft for Public Comment**

Prepared by:  
Michigan Department of Transportation  
Statewide and Urban Travel Analysis Section  
Van Wagoner Transportation Building  
Lansing, MI 48933  
[WittID@Michigan.gov](mailto:WittID@Michigan.gov)  
517-335-4620

in cooperation with

Southwest Michigan Planning Commission (SWMPC)  
376 West Main St., Suite 130  
Benton Harbor, MI 49022  
269-925-1137  
[www.swmpc.org](http://www.swmpc.org)

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## 1.0 Conformity

### 1.1 Introduction

Transportation conformity provisions of the Clean Air Act Amendments require metropolitan planning organizations (MPOs) to make a determination that the Long-Range Transportation Plan (LRTP), Transportation Improvement Program (TIP), and projects conform to the State Implementation Plan (SIP), and that regional emissions will not negatively impact the region's ability to meet the National Ambient Air Quality Standards (NAAQS).

Conformity to the SIP means that the region's LRTPs and TIPs 1) will not cause any new violations of the NAAQS; 2) will not increase the frequency or severity of existing violations; and 3) will not delay attaining the NAAQS. A demonstration is conducted by comparing emission estimates generated from implementation of LRTPs and TIPs for analysis years to the motor vehicle emission budgets (MVEBs) contained in the maintenance SIP.

The purpose of this report is to document the process and findings of the transportation conformity analysis for the nonattainment and maintenance areas.

### 1.2 Nonattainment and Maintenance Areas

Berrien County is the nonattainment area. Within the boundary are the MPO of Twin Cities Area Transportation Study (TwinCATS) and part of the Niles-Buchanan-Cass Area Transportation Study (NATS) MPO, as well as the rural projects contained in the State Transportation Improvement Program (STIP).

Findings of the transportation conformity analysis are for projects within Berrien County. The projects for the 2050 NATS LRTP and 2023 to 2026 TIP were evaluated for this analysis at the March 31, 2023, Michigan Transportation Conformity Interagency Workgroup (MITC-IAWG). Projects in TwinCATS and the Rural State Transportation Implementation Plan (STIP) have not changed since the previous analysis and are included in the modeling. Projects for this analysis are contained in:

- NATS 2050 LRTP in Berrien County,
- NATS 2023-2026 TIP and amendments in Berrien County,
- TwinCATS 2050 LRTP,
- TwinCATS 2023-2026 TIP and amendments, and
- Rural STIP 2023-2026 and amendments in Berrien County.

### 1.3 Conformity Finding

The staff of the Southwest Michigan Planning Commission (SWMPC), representing the two MPOs, finds that the LRTPs and TIPs conform to the SIP for the 2015 ozone standard and the 1997 ozone standard based on the results of this conformity analysis. This report makes the determination that the region's transportation plans and programs satisfy all applicable criteria and procedures in the conformity regulations.

This conformity analysis document is subject to a public comment period from May 15 to June 9, 2023. Comments will be recognized, considered, and responses provided in Appendix B.

On June 20, 2023, The Southwest Michigan Planning Commission is scheduled to make a formal conformity determination, through a resolution, supporting the conformity determination.

### 1.4 Results of Conformity Analysis

Conformity is demonstrated when the analysis-year emissions are equal to or less than the SIP budget. For the 2015 and 1997 ozone standards, as shown in Table 1, the emissions results for the analysis years show that the volatile organic compounds (VOC) and nitrogen oxides (NOx) emissions are lower than the SIP budgets; thus, conformity for the ozone standards are demonstrated.

**Table 1: Results of the 2015 and 1997 Ozone Standards Conformity Analysis**

Analysis Year	Emissions (tons/day)	
	VOC	NOx
SIP Budget	9.16	15.9
2023	1.80	2.48
2025	1.64	2.02
2035	1.10	1.02
2045	0.97	0.85
2050	0.95	0.84

## 2.0 Background and Attainment Status

### 2.1 Background

The federal Clean Air Act Amendments of 1990 (CAAA) established rules to improve the air, protect public health, and protect the environment. The act requires the U.S. Environmental Protection Agency (EPA) to set, review, and revise the National Ambient Air Quality Standards (NAAQS) periodically.

The Clean Air Act links together air quality planning and transportation planning through the transportation conformity process. Air quality planning is controlled by Michigan's SIP, which includes the state's plans for attaining or maintaining the NAAQS. The main transportation planning tools are the metropolitan LRTP and the metropolitan TIP. Transportation conformity ensures that federal funding and approval are given to highway and transit activities that are consistent with the SIP and that these activities will not affect Michigan's ability to achieve the NAAQS.

Transportation activities that are subject to conformity are LRTPs, TIPs, and all non-exempt federal projects that receive Federal Highway Administration (FHWA) or Federal Transit Administration (FTA) funding or approval. The conformity process ensures emissions from LRTP, TIP, or projects are within acceptable levels specified within the SIP and meet the goals of the SIP.

Transportation conformity only applies to on-road sources and transportation-related pollutants: ozone, particulate matter (particulate sizes 2.5 and 10), nitrogen dioxide, and carbon monoxide.

In addition to emissions that are directly emitted, regulations specifically require certain precursor pollutants to be addressed. Precursor pollutants are those pollutants that contribute to the formation of other pollutants. For example, ozone is not directly emitted but created when NO<sub>x</sub> and VOC react with sunlight.

When the EPA revises a NAAQS, all areas of the country are evaluated to determine if monitored levels of the pollutant are at or below the standard; these areas are classified as attainment. If the pollutant level is above the standard, these areas are classified as nonattainment. MPOs in areas classified as nonattainment or maintenance must conduct conformity analysis on their transportation programs.

## 2.2 Attainment Status

On April 15, 2004, the EPA issued final designations of areas not attaining the 1997 ozone NAAQS (also referred to as 1997 ozone standard). Berrien County was designated a nonattainment area.

On May 16, 2007, the EPA redesignated the area attainment/maintenance, approving and finding adequate motor vehicle emissions budgets for VOC and NO<sub>x</sub> for the year 2018. The area was placed into maintenance, requiring conformity emission to be compared to the MVEBs contained in the SIP, referred to as SIP budgets.

On July 20, 2012, the EPA designated all of Michigan as attainment for the strengthened 2008 ozone NAAQS.

On July 20, 2013, the EPA partially revoked the 1997 ozone standard, withdrawing the requirement to do transportation conformity for areas that were in maintenance. On April 6, 2015, the EPA completely revoked the 1997 ozone standard, which resulted in removal of all transportation conformity requirements.

On April 23, 2018, the FHWA started requiring areas in the country to conduct conformity if they were a maintenance area for the 1997 ozone standard and attainment for the 2008 ozone standard when the 1997 ozone NAAQS was revoked. This was to comply with the court's decision in *South Coast Air Quality Management District v. EPA*. Later, this was amended to require MPOs to have a conformity in place on Feb. 16, 2019, and conduct conformity going forward.

On Aug. 3, 2018, the EPA designated Berrien County as nonattainment for the strengthened 2015 ozone NAAQS (also referred to as 2015 ozone standard).

Nov 7, 2022, the Berrien County 2015 ozone nonattainment area was reclassified by EPA from marginal to moderate for failure to attain the NAAQS by August 3, 2021. Therefore, the area now has more stringent CAA requirements to follow to assist in attaining the NAAQS. The area must now show attainment by August 3, 2024, with 2023 being the last ozone season.

### 2.3 SIP Budgets

Berrien County has existing maintenance budgets from the 1997 ozone standard maintenance SIP. Regulations require use of these budgets to test both ozone standards. Emissions generated must be equal to or less than the SIP budgets, also referred to as MVEB. The MVEB is the portion of the total allowable emissions allocated to highway and transit vehicle use in the maintenance or nonattainment area. By showing emissions are below the MVEB, the LRTP and TIPs are conforming to the SIP.

## 3.0 Interagency Consultation

Consultation with federal, state, and local transportation authorities is conducted through the Michigan Transportation Conformity Interagency Workgroup (MITC-IAWG). Issues discussed include evaluating and choosing emission models and methods, determining regionally significant project definition and projects, procedures for future MITC-IAWG meetings, and rules for reviewing projects.

A MITC-IAWG was held on March 31, 2023, to review projects and modeling assumptions; individuals attended by video conferencing (TEAMS). The meeting was a joint meeting between the two conformity areas: the Berrien County 2015 Ozone Nonattainment Area and the Cass County 1997 Ozone Orphan Maintenance Area (OMA). The NATS MPO extends into Cass County, which is a 1997 ozone orphan maintenance area. A summary of the MITC-IAWG meeting and relevant interagency consultation correspondence related to this conformity is in Appendix A. A copy of this conformity analysis was sent to each MITC-IAWG member for review and comment.

## 4.0 Public Participation

The Public Participation Plan, adopted by the MPO Policy Committee, establishes the procedures by which the MPOs reach affected public agencies and the public. The same procedures were followed for this document, ensuring the public has an opportunity to review and comment before the SWMPC, representing the two MPOs, makes a determination.

A formal public comment period for the draft Air Quality Conformity Analysis held from May 15 to June 9, 2023, for the NATS MPO. Public comments received and responses to the comments are in Appendix B.

## 5.0 Projects Evaluated for the Conformity Analysis

The Michigan Transportation Conformity Interagency Workgroup (MITC-IAWG) review projects for the NATS 2050 LRTP and 2023 to 2026 TIP at the March 31 MITC-IAWG. All other projects had been reviewed previously and any non-exempt projects were part of the analysis for the TwinCATS 2050 LRTP and included here. There were no new projects for TwinCATS or rural STIP, all had been reviewed previously as amendments. Projects classified as non-exempt must be analyzed.

## 6.0 Transportation Modeling

### 6.1 Travel Demand Forecasting Models

Nonattainment areas are established independent of MPO boundaries. The Berrien County nonattainment and maintenance area is covered by three travel demand forecasting models: the TwinCATS travel demand model and the South Bend/NATS regional travel demand model, covering the urban portions, and the statewide model covering the rural area of the county. Each of these models was developed in TransCAD modeling software, using the latest demographic and employment data available to generate estimates of travel, vehicle miles of travel (VMT), vehicles hours of travel (VHT), and speeds. Detailed documentation on each of these models is contained in separate documents available upon request.

#### 6.1.2 TwinCATS Model

The TwinCATS model covers the greater Benton Harbor, St. Joseph, and Berrien Springs area. Developed by the Michigan Department of Transportation (MDOT), this standard four-step model has a base year of 2015 and a horizon year of 2050. Each of the four steps - trip generation, trip distribution, mode choice, and traffic assignment - are checked for reasonableness against national standards. Final model validation verifies that the assigned volumes replicate actual traffic counts. The decennial 2010 census and 2015 American Community Survey (ACS) data were the sources of population and household base data. Employment data was obtained from a private business database and verified with local knowledge. Economic, Regional Economic Models Inc. (REMI), and demographic forecast data were used to estimate future growth to 2045. The University of



Michigan and MDOT jointly develop county-specific forecast data for the REMI model. Horizon year 2050 was created by projecting socioeconomic data.

#### 6.1.3 Niles/South Bend Regional Model

This model is a regional model developed by a consultant and covers the NATS MPO and the Michiana Area Council of Governments (MACOG) MPO areas. The model reflects the interconnected travel patterns experienced in the Niles, Michigan, and South Bend, Indiana, region. The model is a hybrid, blending a traditional four-step model with an activity-based model, with a base year of 2015 and horizon year of 2045. Census data was used to develop base population and household data, employment data is developed from a private business database verified with local knowledge, and REMI was used to develop future year socioeconomic data to 2045. Horizon year 2050 was created by projecting VMT and VHT.

#### 6.1.4 Statewide Model

The statewide model developed by a consultant and MDOT (completed in 2019) covers all counties in the state and was used for the non-urban parts of Berrien County. The model is an advanced trip-based model with short- and long-distance passenger trip generation, mode choice, trip distribution, and traffic assignment by four time-of-day periods, as well as freight models for multi- and single-unit trucks and other light commercial vehicles. The model has a base year of 2015 and forecasts traffic in five-year increments through 2045. Required interim analysis years are interpolated. The base year trip table is calibrated to match a passive origin and destination dataset for a typical fall weekday. Trip assignment uses an equilibrium method and base year volumes were validated against traffic counts using MDOT and FHWA standards. Future data is based on REMI and demographic forecasts to 2045. Horizon year 2050 was created by projecting VMT and VHT.

#### 6.1.5 Coding Travel Demand Model Links for NFC by Urban and Rural

For emission modeling, the National Functional Classification (NFC) system is used to determine the function of roads; however, after 2010, NFCs do not distinguish roads by urban and rural. The emission model, Motor Vehicle Emission Simulator (MOVES), requires roads to be classified as urban or rural. MOVES also requires roads to be grouped into one of four road types: rural restricted, rural unrestricted, urban restricted, and urban unrestricted. To determine a road's urban or rural status, roads within the adjusted census urban boundary were considered urban and those outside as rural. NFCs designated as interstate and other freeways are considered restricted while all others are considered unrestricted. The Michigan Geographic Framework (GIS digital base map) was used to combine NFC with adjusted census urban boundary to generate MOVES road types for the network.

#### 6.1.6 Highway Performance Monitoring System (HPMS)

The EPA and FHWA endorse HPMS as the source of VMT estimates. The travel demand modeling VMT is aggregated by NFC road types for the county, then normalized to HPMS data for the base

year/validation year of the travel demand model. Normalization factors were applied to all analysis years.

## 6.2 Analysis Years

Analysis years were determined by the MITC-IAWG. Projects requiring modeling are grouped into an analysis year based on the projects open-to-traffic date. Emissions are generated for each analysis year.

Analysis Year	Reason
2023	2015 ozone NAAQS attainment year
2025	Interim year (so analysis years not more than 10 years apart)
2035	Interim year (so analysis years not more than 10 years apart)
2045	Interim year (so analysis years not more than 10 years apart)
2050	Last year of long-range transportation plans for NATS and TwinCATS

## 7.0 Latest Planning Assumptions

### 7.1 Demographic Data

The most current and future assumptions developed or approved by the MPO were used in the development of the travel demand models. Table 2 shows base and future year 2045 population and employment by county from the travel demand models. Future year REMI data was not available for 2050 at the time of this analysis; only the TwinCATS model projected socioeconomic data to year 2050.

**Table 2: Base and Future Year Population and Employment by County**

County	Population		Employment	
	2015	2045	2015	2045
Berrien County	154,845	158,681	80,113	81,989

### 7.2 Vehicle Miles of Travel

VMT is one measure of travel. Current and future levels of travel and growth rates are provided in Table 3.

**Table 3: Vehicle Miles of Travel and Growth Rate by County**

	Analysis year					
Berrien County	Base Year 2015	2023	2025	2035	2045	2050
VMT	5,362,141	5,508,248	5,521,750	5,639,161	5,749,027	5,796,859
Growth Rate	1.00	1.03	1.03	1.05	1.07	1.08

### 7.3 Vehicle Hours of Travel

VHT is an indicator of congestion. Current and future levels are provided in Table 4.

**Table 4: Vehicle Hours of Travel by County**

	Analysis year					
Berrien County	Base Year 2015	2023	2025	2035	2045	2050
VHT	119,758	121,817	122,188	123,939	126,418	127,467

### 7.4 Transportation Control Measures

There are no transportation control measures (TCMs) identified in the applicable state implementation plan. Thus, no measures are included at this time.

## 8.0 Emission Modeling

### 8.1 MOVES Specifications

The EPA's MOVES version MOVES3.1 was used to generate emissions. Ozone is formed in the presence of heat and sunlight, so the highest ozone concentrations are monitored during the summer. This conformity analysis involves generating summer (July) weekday emissions to simulate the meteorology of a high-ozone summer day.

### 8.2 Road Type Distribution

HPMS data is used to create MOVES road-type distribution fractions. County-level HPMS passenger data is used for motorcycle and passenger vehicles, and commercial HPMS is used for trucks and buses. HPMS VMT is aggregated to MOVES road types, then converted to a fraction, generating a road-type distribution.

### 8.3 Average Speed

A speed distribution is created using a method developed by EPA for taking a single average speed and creating a distribution. An average speed is generated for each of the four-time periods (a.m., midday, p.m., and off-peak) in the travel demand forecasting models for each of the four road types in MOVES, generating 16 average speeds. The same distribution was used for each vehicle type. The Niles/South Bend travel demand model was not used to generate speeds.

### 8.4 Average Weekday VMT to Annual VMT

Monthly VMT adjustment factors were obtained from MDOT's data collection area. The EPA's AADVMT Converter-Tool MOVES2014 was used to convert annual average daily VMT to annual VMT, monthly VMT fractions, and daily VMT fractions. Hourly fractions use MOVES default data. For motorcycles, the monthly fractions use MOVES defaults since local data is limited. Future analysis years utilize the same fractions.

### 8.5 Vehicle Population

The source of the vehicle population is the Michigan Secretary of State (SOS) vehicle registration database of 2015. The database was supplemented with school bus data from the Michigan Department of Education and MDOT public transit bus data. The EPA's default distributions were used to determine other bus, refuse truck, single-unit truck, and combination truck categories. The SOS data must be converted to MOVES source (vehicle) types. Table 5 shows how vehicle body style combined with plate type and company code are used to obtain MOVES vehicle types.

Future year vehicle population is based on growth in VMT from base year to analysis year. The growth rate is applied to all MOVES vehicle types. Table 3 shows the VMT for each analysis year and growth rate.

### 8.6 Vehicle Age Distribution

MOVES requires vehicle age as one of the local data inputs. The Michigan SOS vehicle registration database of 2015 was the source of vehicle ages. Vehicles are assigned to an age group, from 0 to 30-plus, based on model year indicated in the SOS database, with 0 being the newest vehicles (2015 or newer) and each year is its own group until vehicles are 30 years and older, which are aggregated into the 30-plus group. The SOS database is sorted by MOVES vehicle types and age. For intercity buses, refuse trucks, single-unit trucks, and combination trucks, the EPA's default age distribution are used to calculate splits in population because of limited local numbers. Base year age distribution fractions were used for all future analysis years.

### 8.7 Meteorology Data

Local meteorology data was imported into MOVES. Data was sourced from the Midwestern Regional Climate Center (MRCC) using the cli-MATE tool. For ozone, a typical summer day is being estimated. Local temperature and humidity data for year 2015, measured at the airport within the nonattainment area, was generated by averaging the three summer months: June, July, and August.

## 8.8 Other Local Data

The MOVES model allows input for other types of local data, if available. This conformity demonstration used default data for hoteling (truck parking) and starts. The default fuel data is correct for Michigan and was used.

## 9.0 Conclusion

Conformity has a two-step endorsement process. The MPOs must make a formal conformity determination through a resolution that the findings of this conformity analysis conform to the SIP; thus, emissions are at or below the budgets found in the SIP. Then FHWA, jointly with the FTA, after consultation with the EPA, issues a letter of concurrence with the determination.

The conformity analysis described here and conducted by MDOT, with support of TwinCATS and NATS, concludes that the NATS 2050 LRTP and 2023- 2026 TIP, TwinCATS 2023-2026 TIP and 2050 LRTP, along with the projects in the 2023-2026 STIP, contained in Berrien County meet all applicable requirements for conformity for the 2015 and 1997 ozone standards; thus, it is recommended that FHWA support this conformity determination finding.

**Table 5: MOVES Source Types from SOS Body Style, Plate Type, and Company Code**

MOVES Source Type	SOS Body Style, Plate Type, and Company Code
11 – Motorcycles	Motorcycles
21 – Passenger Cars	Two-Door Four-Door Convertible Roadster Low-Speed
31 – Passenger Trucks	Station Wagon Pickup Van Hearse with Plate Type, Personal Ambulance with Plate Type, Personal Panel Van with Plate Type, Personal
32 – Light Commercial Trucks	Pickup with Plate Type, Commercial or Company Van with Plate Type, Commercial or Company Hearse with Plate Type, Commercial or Company Ambulance with Plate Type, Commercial or Company Panel Van with Plate Type, Commercial or Company Utility Truck Wrecker
40 – Buses (MOVES: 41*, 42, 43)	Bus; Supplemented with Other Data Sources
50 – Single-Unit Trucks* (MOVES: 51, 52, 53)	Dump Truck Mixer Truck Stake Truck
54 – Motorhomes	Motorhome
60 – Combination Trucks* (MOVES: 61, 62)	Tractor Trailer Tanker

\* The EPA default age distribution is applied to calculate individual MOVES Source Type categories.

## Appendix A: Meeting Summary of the Interagency Workgroups

### Meeting Summary

Michigan Transportation Conformity Interagency Workgroup (MITC-IAWG)

For the

**Berrien County 2015 Ozone Nonattainment Area and  
Cass County 1997 Ozone Orphan Maintenance Area**

March 31, 2023

10:30 to 11:30 a.m. TEAMS Meeting

#### Name

#### Agency

#### **In attendance:**

Andy Pickard	Federal Highway Administration (FHWA)
Michael Leslie	US Environmental Protection Agency (EPA)
Breanna Bukowski	Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Tracey McDonald	EGLE
Marissa Vaerten	EGLE
Donna Wittl	Michigan Department of Transportation (MDOT) – regional conformity
Brandon Kovnat	Southwest Michigan Planning Commission (SWMPC) representing TwinCATS and NATS MPOs
Kim Gallagher	SWMPC representing the TwinCATS and NATS MPOs
Jim Sturdevant	MDOT – program manager
Josh Grab	MDOT – region planner
Lane Masoud	MDOT – project level conformity and NEPA

- 1) **Welcome and Introductions.** Introductions were held.
- 2) **Berrien County Reclassification: Marginal to Moderate** (Tracey McDonald and Marissa Vaerten, EGLE)
  - a. **Attainment Demonstration Moderate 2015 Ozone State Implementation Plan**  
Tracey from EGLE provided information to the group about the three 2015 NAAQS ozone nonattainment areas on the west side of the state not making the marginal attainment date and were reclassified from marginal to moderate. And as such, a State Implementation Plan (SIP) Attainment Demonstration must be created and submitted to EPA to show the area can attain the NAAQS. The SIP has a lot of moving parts that need to come together. Rules need to be enacted that will lower the volatile organic compounds (VOC) produced by certain industries and products to reach the reduction in VOCs required by the moderate classification. By the beginning of the last full ozone season of the attainment period, which is 2023, the rules need to be in place. The VOC rules have been created and NOx rules will be coming. As part of the requirements for

a moderate area a 15 percent reduction in VOC's must be shown. Finding the needed reductions has been difficult in Berrien County. Much of the reductions are coming from the on-road sector. A comment was made during the discussion that ozone is being transported from other areas outside the state and causing the monitors to show high levels. It was stated that the new Good Neighbor Rule is trying to address this. But for now, we must address sources within the nonattainment area. The question was asked, what happens if the requirement is not met. Answer is EPA will disapprove this portion of the SIP if submitted, make a finding of failure to submit and a two-year sanction clock will start. If the clock's two-year time expires without being properly addressed – highway sanctions are imposed for the nonattainment area. It was mentioned that EGLE did a nice presentation on the rules that are changing because of the moderate classification and the link to the recording and rules can be found on the EGLE website. Link to the Part 6 Rule revision webinar as well as information on future rule work:

<https://www.michigan.gov/egle/about/organization/air-quality/laws-and-rules>

And questions on the rules can be sent to: [EGLE-AQD-Rules@michigan.gov](mailto:EGLE-AQD-Rules@michigan.gov)

**b. New motor vehicle emission budgets (MVEB)**

A discussion was held on how new budgets are created and EGLE explained that “reasonable further progress,” a requirement of the Clean Air Act for a moderate nonattainment area, is the reduction in emissions from year 2017 to 2023 needed by all sources. Most of the reduction is coming from on-road sources and in order to achieve the 15 percent reduction in volatile organic compounds (VOC) only a small “buffer” amount can be saved for use in the MVEBs. The MVEB is created by projecting what is needed, and then holding back a (sometimes small) percentage of the reduction and allocating it to the on-road sector, this is called a “safety margin,” to ensure the budget can be met in the future to account for growth but still meet the NAAQS. Different percentages and MVEB numbers were discussed. For the Berrien County 2015 ozone nonattainment area the group agreed to support a MVEB of 1.85 tons per summer day (tpsd) for VOC and 2.56 tpsd for nitrogen oxides (NOx). Note: after the meeting EGLE increase the NOx MVEB to 2.98 tpsd.

**3) Conformity Documents:**

**a. Berrien County: New 2050 Niles-Buchanan-Cass Area Transportation Study (NATS) Long Range Transportation Plan (LRTP) – requires emission analysis**

A new analysis will be done for the Berrien County Nonattainment Area.

**b. Cass County: New 2050 NATS LRTP – conformity report (no analysis)**

A new conformity report will be created for the Cass County Orphan Maintenance Area.

**4) Project Review:**



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- a. **Project List for NATS** - (sent with appointment and agenda)  
A few projects were discussed in more detail. The Gumwood realignment with new roundabout was discussed; project is in Cass County. The roundabout and the realignment are two separate projects. The NEPA and SHPO (State Historic Preservation Office) processes are ongoing for this project. The property owner of the land where the realigned road is proposed is contesting the project. The project was determined to be exempt. The US-12 project JN214141 in Cass County was also discussed and determined to be exempt. The group agreed all projects were exempt from air quality modeling.
  - b. **Projects for Twin Cities Area Transportation Study (TwinCATS)** – no changes since the last amendment.
  - c. **Projects for Rural State Transportation Improvement Program (STIP)** – no change from latest amendment.
- 5) **Analysis years:** Group agreed on the analysis years.
- 2015 base year of travel demand models
  - 2023 attainment year of 2015 ozone NAAQS – moderate  
(Must attain standard not later than 2023)
  - 2025 interim analysis year
  - 2035 interim analysis year
  - 2045 interim analysis year
  - 2050 last year of LRTPs
- 6) **Modeling:**
- a. **Emission model:** MOVES 3.1 will be used.
  - b. **Meteorology data:** same method as for TwinCATS LRTP
  - c. **Speeds:** same method as for TwinCATS LRTP
  - d. **Budgets:** 1997 ozone standard maintenance budgets will be used.
- 7) **Public comment period:** The exact dates for the public comment period have not been decided yet.
- 8) **Formal Resolution from SWMPC supporting findings:** June 20, 2023, was confirmed.
- 9) **New determination letter:** A new letter from FHWA will be needed by Aug 7, 2023; last LRTP letter dated Aug 7, 2019.
- 10) **Other topics:**
- Conformity analysis for Berrien County and conformity report for Cass County will be completed by the end of April. The MPO's plan is to have the LRTP done by end of May.

## Appendix B: Public Comments and Responses

## Appendix C: Projects Evaluated for Conformity Analysis

Attached are the projects evaluated at the March 31, 2023, MITC-IAWG, for the NATS LRTP. The projects for TwinCATS and the rural STIP within Berrien County are included in this analysis but there have been no changes in nonexempt projects since the last analysis. Projects for TwinCATS, NATS, and rural STIP within Berrien County are being evaluated in this conformity report.

The list of projects begins on the following page.

Fiscal Year	Job no.	County	Type	Responsible Agency	Project Name	Limits	Length	Primary work Type	Project Description	Phase	Federal Fund Source	Federal Budget	State Budget	Local Budget	Total Phase Cost	Air Quality
2023	206694	Berrien	Multi-Modal	Niles Dial A Ride	Transit Operating	Niles Dial A Ride	0.00	SP3000-operating except JARC and New Freedom	Operating expenses for FY 2023 using 5307 funds	NI	5307	\$150,000	\$150,000	\$0	\$300,000	exempt
2023	206695	Berrien	Multi-Modal	Niles Dial A Ride	Transit Capital	Niles Dial A Ride	0.00	SP1801-preventative	Preventative Maintenance in FY 2023 using 5307 funds	NI	5307	\$110,000	\$27,500	\$0	\$137,500	exempt
2023	206699	Berrien	Multi-Modal	Niles Dial A Ride	Transit Capital	Niles Dial A Ride	0.00	SP1101-<30 foot replacement bus with or	Replace one cutaway bus in FY 2023 using 5339 funds	NI	5339	\$68,000	\$17,000	\$0	\$85,000	exempt
2023	206618	Berrien	Local	Buchanan	W Front St	Front and Oak Street Intersection	0.20	Traffic Safety	Replace Traffic Signal	CON	CRU	\$78,873	\$0	\$325,627	\$404,500	exempt
2023	201984	Berrien	Trunkline	MDOT	US-31 N	US-12 to Berrien Township	12.19	Road Rehabilitation	Hot Mix Asphalt Overlay	CON	NH	\$16,247,225	\$3,602,775	\$0	\$19,850,000	exempt
2023	202003	Berrien	Trunkline	MDOT	M-51	Chestnut Lane to M-60BR	5.01	Reconstruction	Interchange reconstruction and asphalt resurfacing	CON	NH	\$21,281,000	\$4,719,000	\$0	\$26,000,000	exempt
2023	214938	Berrien	Trunkline	MDOT	US-12	Mayflower Road to M-139	1.88	Road Rehabilitation	Mill and Two Course Hot Mix Asphalt Overlay	PE	NH	\$345,407	\$76,593	\$0	\$422,000	exempt
2023	206394	Berrien	Local	Buchanan	West Front Street	Red Bud Trail to Oak Street	0.15	Reconstruction	Reconstruction	CON	ST	\$44,354	\$0	\$67,451	\$111,805	exempt
2023	127449	Berrien	Trunkline	MDOT	US-12	Galien Township line to west of Mayflower Road	6.77	Road Rehabilitation	Shoulder Rehabilitation	CON	ST,VRU	\$8,336,423	\$1,848,578	\$0	\$10,185,000	exempt
2023	206394	Berrien	Local	Buchanan	West Front Street	Red Bud Trail to Oak Street	0.15	Reconstruction	Reconstruction	CON	STU	\$594,929	\$0	\$2,310,566	\$2,905,495	exempt
2023	206395	Berrien	Local	Berrien County	E Bertrand Rd	M-51 East to County Line	1.29	Road Capital Preventive Maintenance	HMA overlay with paved shoulders	CON	STU	\$441,990	\$0	\$150,962	\$592,952	exempt
2024	216352	Berrien	Multi-Modal	Niles Dial A Ride	Transit Capital	Areawide	0.00	SP1801-preventative	Preventative Maintenance in FY 2024 using 5307	NI	5307	\$110,000	\$27,500	\$0	\$137,500	exempt
2024	216357	Berrien	Multi-Modal	Niles Dial A Ride	Transit Operating	Areawide	0.00	SP3000-operating except JARC and New Freedom	Operating Expenses for FY 2024 using 5307 funds	NI	5307	\$155,200	\$155,200	\$0	\$310,400	exempt
2024	216359	Berrien	Multi-Modal	Niles Dial A Ride	Transit Capital	Areawide	0.00	SP1203-admin/maintenance facility improvements	Transit Capital in FY 2024 usng5339 funds	NI	5339	\$52,800	\$13,200	\$0	\$66,000	exempt
2024	215349	Berrien	Multi-Modal	Niles Dial A Ride	Transit Capital	Areawide	0.00	SP1101-<30 foot replacement bus with or	Replace three (3) buses with transit vans using 2024 CMAQ funds	NI	CM	\$140,000	\$35,000	\$0	\$175,000	exempt
2024	208503	Berrien	Trunkline	MDOT	US-31	under Buchanan Road, Niles Township, Berrien County	0.00	Bridge CPM	Epoxy Overlay, Replace Expansion Joint, P&H Repl, Zone Paint, Approaches	CON	NH	\$1,938,382	\$429,831	\$0	\$2,368,213	exempt
2024	216911	Berrien	Trunkline	MDOT	US-31 S	US-12 to Niles/Berrien Township Line	12.22	Road Capital Preventive Maintenance	Concrete pavement repairs and shoulder one course milling and resurfacing	CON	NH	\$2,205,639	\$489,094	\$0	\$2,694,733	exempt
2024	211989	Berrien	Trunkline	MDOT	Areawide	US-12 @ Redbud, M-139 @ M-139	0.00	Traffic Safety	Modernize signals to current standards	ROW	STG	\$0	\$0	\$0	\$0	exempt
2024	216087	Berrien	Local	Berrien County	W Bertrand Rd	US-31 to Portage Rd.	1.18	Road Capital Preventive Maintenance	HMA trench & widen with overlay	CON	STU	\$222,433	\$0	\$77,567	\$300,000	exempt
2024	216092	Berrien	Local	Niles	Wayne St	North 5th Street to 13th Street	0.50	Road Capital Preventive Maintenance	HMA Mill & Resurface	CON	STU	\$252,514	\$0	\$88,057	\$340,571	exempt
2024	214949	Berrien	Local	Buchanan	Schirmer Pkwy	McCoy Creek Trail, City of Buchanan, Berrien County	0.77	Roadside Facilities - Improve	Nonmotorized path and sidewalk construction	CON	TA	\$169,885	\$0	\$128,159	\$298,044	exempt
2024	214949	Berrien	Local	Buchanan	Schirmer Pkwy	McCoy Creek Trail, City of Buchanan, Berrien County	0.77	Roadside Facilities - Improve	Nonmotorized path and sidewalk construction	CON	TAU	\$169,885	\$0	\$128,159	\$298,044	exempt
2025	216372	Berrien	Multi-Modal	Niles Dial A Ride	Transit Operating	Areawide	0.00	SP3000-operating except JARC and New Freedom	Transit Operating for FY 2025 using 5307 Funds	NI	5307	\$160,500	\$160,500	\$0	\$321,000	exempt
2025	216373	Berrien	Multi-Modal	Niles Dial A Ride	Transit Capital	Areawide	0.00	SP1801-preventative maintenance	Preventative Maintenance in FY 2025 using 5307	NI	5307	\$110,000	\$27,500	\$0	\$137,500	exempt
2025	216374	Berrien	Multi-Modal	Niles Dial A Ride	Transit Capital	Areawide	0.00	SP1102-30-34 foot replacement bus with or without lift	Replace one bus in FY 2025 using 5339 funds	NI	5339	\$72,000	\$18,000	\$0	\$90,000	exempt
2025	215065	Berrien	Trunkline	MDOT	US-12	over St. Joseph River, St. Joseph County	0.00	Bridge Replacement	Bridge removal and replacement, scour countermeasure, Approaches	PE	BFP	\$16,370	\$3,630	\$0	\$20,000	exempt
2025	215065	Berrien	Trunkline	MDOT	US-12	over St. Joseph River, St. Joseph County	0.00	Bridge Replacement	Bridge removal and replacement, scour countermeasure, Approaches	PES	BFP	\$1,129,530	\$250,470	\$0	\$1,380,000	exempt
2025	214938	Berrien	Trunkline	MDOT	US-12	Mayflower Road to M-139	1.88	Road Rehabilitation	Mill and Two Course Hot Mix Asphalt Overlay	CON	NH	\$3,731,132	\$827,368	\$0	\$4,558,500	exempt
2025	215947	Berrien	Local	Berrien County	W Bertrand Rd	US-31 to Red Bud Trail	1.63	Road Capital Preventive Maintenance	HMA trench & widen with overlay	CON	STU	\$374,521	\$0	\$83,049	\$457,570	exempt
2025	216108	Berrien	Local	Niles	Sycamore St	9th Street to 13th Street	0.25	Road Capital Preventive Maintenance	Mill and Resurface	CON	STU	\$133,256	\$0	\$29,549	\$162,805	exempt
2026	216375	Berrien	Multi-Modal	Niles Dial A Ride	Transit Operating	Areawide	0.00	SP3000-operating except JARC and New Freedom	Transit Operating for FY 2026 using 5307 Funds	NI	5307	\$160,500	\$160,500	\$0	\$321,000	exempt
2026	216376	Berrien	Multi-Modal	Niles Dial A Ride	Transit Capital	Areawide	0.00	SP1801-preventative maintenance	Preventative Maintenance in FY 2026 using 5307	NI	5307	\$115,500	\$28,875	\$0	\$144,375	exempt
2026	216377	Berrien	Multi-Modal	Niles Dial A Ride	Transit Capital	Areawide	0.00	SP1102-30-34 foot replacement bus with or without lift	Replace one bus in FY 2026 using 5339 funds	NI	5339	\$75,200	\$18,800	\$0	\$94,000	exempt
2026	214935	Berrien	Trunkline	MDOT	M-139	US-12 to M-140	5.03	Road Rehabilitation	Mill and Two Course Hot Mix Asphalt Overlay	PE	ST	\$876,368	\$194,332	\$0	\$1,070,700	exempt
2026	211989	Berrien	Trunkline	MDOT	Areawide	US-12 @ Redbud, M-139 @ M-139	0.00	Traffic Safety	Modernize signals to current standards	CON	STG	\$573,927	\$0	\$0	\$573,927	exempt

Fiscal Year	Job no.	County	Type	Responsible Agency	Project Name	Limits	Length	Primary work Type	Project Description	Phase	Federal Fund Source	Federal Budget	State Budget	Local Budget	Total Phase Cost	Air Quality
2026	216111	Berrien	Local	Berrien County	Red Bud Trl	US-12 to Bertrand Road	2.58	Road Capital Preventive Maintenance	HMA Overlay	CON	STU	\$378,212	\$0	\$121,788	\$500,000	exempt
2026	216119	Berrien	Local	Niles	Pokagon St	2nd Street to 5th street	0.23	Road Capital Preventive Maintenance	Mill and Resurface	CON	STU	\$130,811	\$0	\$29,007	\$159,818	exempt
2027	218747	Berrien	Trunkline	MDOT	M-51	M-51 from Fort Street northerly to North Niles City Limit	3.04	Traffic Safety	Vulnerable Road User Road Safety Audit	EPE	HSIP	\$22,500	\$2,500	\$0	\$25,000	exempt
2029	215065	Berrien	Trunkline	MDOT	US-12	over St. Joseph River, St. Joseph County	0.00	Bridge Replacement	Bridge removal and replacement, scour countermeasure, Approaches	CON	BFP	\$15,284,670	\$3,389,332	\$0	\$18,674,000	exempt
2029	214935	Berrien	Trunkline	MDOT	M-139	US-12 to M-140	5.03	Road Rehabilitation	Mill and Two Course Hot Mix Asphalt Overlay	CON	ST	\$7,948,208	\$1,762,492	\$0	\$9,710,700	exempt
2023	207365	Both	Trunkline	MDOT	Regionwide	All trunkline routes of SWMPC MPO	0.98	Traffic Safety	Longitudinal pavement marking application on trunklines in Southwest Region	PE	HSIP	\$1,278	\$142	\$0	\$1,420	exempt
2023	207365	Both	Trunkline	MDOT	Regionwide	All trunkline routes of SWMPC MPO	0.98	Traffic Safety	Longitudinal pavement marking application on trunklines in Southwest Region	CON	HSIP	\$253,044	\$28,116	\$0	\$281,160	exempt
2023	207367	Both	Trunkline	MDOT	Regionwide	All trunkline routes of SWMPC MPO	1.19	Traffic Safety	Special pavement marking application on trunklines in Southwest Region	PE	HSIP	\$1,278	\$142	\$0	\$1,420	exempt
2023	207367	Both	Trunkline	MDOT	Regionwide	All trunkline routes of SWMPC MPO	1.19	Traffic Safety	Special pavement marking application on trunklines in Southwest Region	CON	HSIP	\$65,178	\$7,242	\$0	\$72,420	exempt
2023	207378	Both	Trunkline	MDOT	Regionwide	All trunkline routes of SWMPC MPO	1.72	Traffic Safety	Pavemt marking retroreflectivity readings on Southwest Region trunklines	CON	HSIP	\$1,802	\$200	\$0	\$2,002	exempt
2023	209414	Both	Trunkline	MDOT	Regionwide	M51 @ SYCAMORE, M139 @ M139, M60BR @ MAIN, M63 @ US12, M62 @ ELKHART	0.00	Traffic Safety	Modernizing signalized intersection to current standards	ROW	STG	\$30,000	\$0	\$0	\$30,000	exempt
2024	207391	Both	Trunkline	MDOT	Regionwide	All trunkline routes of SWMPC MPO	2.88	Traffic Safety	Longitudinal pavement marking application on trunklines in Southwest Region	PE	HSIP	\$1,278	\$142	\$0	\$1,420	exempt
2024	207391	Both	Trunkline	MDOT	Regionwide	All trunkline routes of SWMPC MPO	2.88	Traffic Safety	Longitudinal pavement marking application on trunklines in Southwest Region	CON	HSIP	\$288,189	\$32,021	\$0	\$320,210	exempt
2024	207392	Both	Trunkline	MDOT	Regionwide	All trunkline routes of SWMPC MPO	3.82	Traffic Safety	Special pavement marking application on trunklines in Southwest Region	PE	HSIP	\$1,278	\$142	\$0	\$1,420	exempt
2024	207392	Both	Trunkline	MDOT	Regionwide	All trunkline routes of SWMPC MPO	3.82	Traffic Safety	Special pavement marking application on trunklines in Southwest Region	CON	HSIP	\$49,203	\$5,467	\$0	\$54,670	exempt
2024	207403	Both	Trunkline	MDOT	Regionwide	All trunkline routes of SWMPC MPO	1.69	Traffic Safety	Pavement marking retroreflectivity readings on Southwest Region trunklines	CON	HSIP	\$1,406	\$156	\$0	\$1,562	exempt
2024	211815	Both	Trunkline	MDOT	M-51	M-51	30.06	Traffic Safety	Durable all-weather markings with centerline and shoulder corrugations	CON	HSIP	\$70,496	\$7,833	\$0	\$78,329	exempt
2024	217472	Both	Trunkline	MDOT	Regionwide	All trunkline routes in SWMPC MPO	7.07	Traffic Safety	Durable pavement marking application on trunklines in Southwest Region	PE	HSIP	\$639	\$71	\$0	\$710	exempt
2024	217472	Both	Trunkline	MDOT	Regionwide	All trunkline routes in SWMPC MPO	7.07	Traffic Safety	Durable pavement marking application on trunklines in Southwest Region	CON	HSIP	\$52,398	\$5,822	\$0	\$58,220	exempt
2024	209414	Both	Trunkline	MDOT	Regionwide	US12BR (LINCOLN) @ US12BR (GRANT), M51 (5TH) @ SYCAMORE, M62 @ US12 (MAIN), M62 @ REDFIELD RD, M62 @ ELKHART RD, M60BR (OAK) @ MAIN & 13TH ST	0.00	Traffic Safety	Modernizing signalized intersection to current standards	CON	STG	\$1,950,463	\$0	\$0	\$1,950,463	exempt
2025	209623	Both	Trunkline	MDOT	Regionwide	All trunkline routes of SWMPC MPO	2.79	Traffic Safety	Longitudinal pavement marking application on trunklines in Southwest Region	PE	HSIP	\$1,278	\$142	\$0	\$1,420	exempt
2025	209623	Both	Trunkline	MDOT	Regionwide	All trunkline routes of SWMPC MPO	2.79	Traffic Safety	Longitudinal pavement marking application on trunklines in Southwest Region	CON	HSIP	\$269,019	\$29,891	\$0	\$298,910	exempt
2025	209624	Both	Trunkline	MDOT	Regionwide	All trunkline routes of SWMPC MPO	2.84	Traffic Safety	Special pavement marking application on trunklines in Southwest Region	PE	HSIP	\$1,278	\$142	\$0	\$1,420	exempt
2025	209624	Both	Trunkline	MDOT	Regionwide	All trunkline routes of SWMPC MPO	2.84	Traffic Safety	Special pavement marking application on trunklines in Southwest Region	CON	HSIP	\$39,618	\$4,402	\$0	\$44,020	exempt
2025	209634	Both	Trunkline	MDOT	Regionwide	All trunkline routes of SWMPC MPO	2.03	Traffic Safety	Pavement marking retro reflectivity readings on Southwest Region trunklines	CON	HSIP	\$1,406	\$156	\$0	\$1,562	exempt
2025	211812	Both	Trunkline	MDOT	M-43	M-62, M-139, M-140	102.33	Traffic Safety	Installation of all-weather pavement markings and corrugations	PE	HSIP	\$37,623	\$4,180	\$0	\$41,803	exempt
2026	211812	Both	Trunkline	MDOT	M-43	M-62, M-139, M-140	102.33	Traffic Safety	Installation of all-weather pavement markings and corrugations	CON	HSIP	\$334,422	\$37,158	\$0	\$371,580	exempt
2026	213341	Both	Trunkline	MDOT	Regionwide	All trunkline routes in SWMPC MPO	3.61	Traffic Safety	Application of longitudinal pavement markings on Southwest Region trunkline	PE	HSIP	\$1,278	\$142	\$0	\$1,420	exempt
2026	213341	Both	Trunkline	MDOT	Regionwide	All trunkline routes in SWMPC MPO	3.61	Traffic Safety	Application of longitudinal pavement markings on Southwest Region trunkline	CON	HSIP	\$265,824	\$29,536	\$0	\$295,360	exempt

Fiscal Year	Job no.	County	Type	Responsible Agency	Project Name	Limits	Length	Primary work Type	Project Description	Phase	Federal Fund Source	Federal Budget	State Budget	Local Budget	Total Phase Cost	Air Quality
2026	213342	Both	Trunkline	MDOT	Regionwide	All trunkline routes in SWMPC MPO	2.97	Traffic Safety	Application of special pavement markings on Southwest Region trunkline	PE	HSIP	\$1,278	\$142	\$0	\$1,420	exempt
2026	213342	Both	Trunkline	MDOT	Regionwide	All trunkline routes in SWMPC MPO	2.97	Traffic Safety	Application of special pavement markings on Southwest Region trunkline	CON	HSIP	\$49,203	\$5,467	\$0	\$54,670	exempt
2026	213371	Both	Trunkline	MDOT	Regionwide	All of SWMPC MPO	19.43	Traffic Safety	Pvmt mrkg retro reflectivity readings on trunklines in Southwest Region	CON	HSIP	\$1,406	\$156	\$0	\$1,562	exempt
2027	213379	Both	Trunkline	MDOT	Regionwide	All of SWMPC MPO	28.35	Traffic Safety	Pvmt mrkg retro reflectivity readings on trunklines in Southwest Region	CON	HSIP	\$1,406	\$156	\$0	\$1,562	exempt
2023	207181	Cass	Local	Cass County	Calvin Center Rd	US-12 to Grange Street	1.32	Road Capital Preventive Maintenance	Mill and one course non-structural hot-mix-asphalt overlay	CON	EDD	\$0	\$24,800	\$0	\$24,800	exempt
2023	211842	Cass	Local	Cass County	Gumwood Rd	Gumwood Road at Redfield Street, Cass County	0.29	Traffic Safety	Roundabout	CON	HSIP	\$581,672	\$0	\$145,418	\$727,090	exempt
2023	214939	Cass	Trunkline	MDOT	US-12	M-139 to Leet Road	6.39	Road Rehabilitation	Concrete Pavement Repairs	CON	NH	\$4,993,013	\$1,107,187	\$0	\$6,100,200	exempt
2023	207181	Cass	Local	Cass County	Calvin Center Rd	US-12 to Grange Street	1.32	Road Capital Preventive Maintenance	Mill and one course non-structural hot-mix-asphalt overlay	CON	STL	\$198,400	\$0	\$24,800	\$223,200	exempt
2023	218476	Cass	Local	Cass County	Gumwood Rd	Gumwood and Redfield Intersection	0.40	New Roads	Realignment of Gumwood Rd.	CON	STL	\$0	\$0	\$133,061	\$133,061	exempt
2023	218476	Cass	Local	Cass County	Gumwood Rd	Gumwood and Redfield Intersection	0.40	New Roads	Realignment of Gumwood Rd.	CON	STU	\$339,282	\$0	\$160,413	\$499,695	exempt
2024	216783	Cass	Local	Cass County	Pine Lake St	Conrad Rd. to Dailey Rd.	1.44	Road Capital Preventive Maintenance	Mill and one course Asphalt Overlay	CON	EDD	\$0	\$29,924	\$0	\$29,924	exempt
2024	214141	Cass	Trunkline	MDOT	US-12	at Beebe Road and Adamsville Road intersection in Cass County	0.36	Minor Widening	Addition of Left turn lane and Passing Flare	PE	HSIP	\$229,927	\$25,547	\$0	\$255,474	exempt
2024	216783	Cass	Local	Cass County	Pine Lake St	Conrad Rd. to Dailey Rd.	1.44	Road Capital Preventive Maintenance	Mill and one course Asphalt Overlay	CON	STL	\$161,421	\$0	\$107,893	\$269,314	exempt
2024	216091	Cass	Local	Cass County	Cassopolis Rd	US-12 to Old 205	0.79	Road Rehabilitation	2.5" mill and HMA overlay	CON	STU	\$134,053	\$0	\$46,747	\$180,800	exempt
2025	214141	Cass	Trunkline	MDOT	US-12	at Beebe Road and Adamsville Road intersection in Cass County	0.36	Minor Widening	Addition of Left turn lane and Passing Flare	ROW	HSIP	\$4,500	\$500	\$0	\$5,000	exempt
2025	202654	Cass	Trunkline	MDOT	Countywide	Signing Upgrade, Signing Update	124.00	Traffic Safety	Non-freeway signing	CON	STG	\$177,000	\$0	\$0	\$177,000	exempt
2025	216106	Cass	Local	Cass County	Elkhart Rd	May Street to Village of Edwardsburg limits	0.84	Road Capital Preventive Maintenance	1.5" HMA Mill and Overlay	CON	STU	\$100,841	\$0	\$22,361	\$123,202	exempt
2026	214141	Cass	Trunkline	MDOT	US-12	at Beebe Road and Adamsville Road intersection in Cass County	0.36	Minor Widening	Addition of Left turn lane and Passing Flare	CON	HSIP	\$1,121,220	\$124,580	\$0	\$1,245,800	exempt
2026	218476	Cass	Local	Cass County	Gumwood Rd	Gumwood and Redfield Intersection	0.40	New Roads	Realignment of Gumwood Rd.	CON	STL	\$532,244			\$532,244	exempt
2026	216117	Cass	Local	Cass County	Redfield St	County line to Batchelor Road	1.04	Road Capital Preventive Maintenance	1.5" HMA Overlay	CON	STU	\$122,976	\$0	\$27,270	\$150,246	exempt