

# **Transportation Conformity Determination Report for the 1997 Ozone NAAQS**

## **Cass County Orphan Maintenance Area**

### **New 2026-2029 Transportation Improvement Plan**

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## Executive Summary

As part of its transportation planning process, the Niles-Buchanan-Cass Area Transportation Study (NATS) and the State Transportation Improvement Plan (STIP) completed the transportation conformity process for the new 2026-2029 Transportation Improvement Programs (TIPs) for Cass County. This report also covers the relevant portions of the NATS 2050 Metropolitan Transportation Plan (MTP).

This report documents that the NATS' 2026-2029 TIP and associated 2050 MTP and the projects in Cass County in the 2026-2029 STIPs meet the federal transportation conformity requirements in 40 CFR Part 93 Subpart A.

Clean Air Act (CAA) section 176(c) (42 U.S.C. 7506(c)) requires federally funded or approved highway and transit activities are consistent with ("conform to") the purpose of the State Implementation Plan (SIP). Conformity to the purpose of the SIP means that transportation activities will not cause or contribute to new air quality violations, worsen existing violations, or delay timely attainment of the relevant National Ambient Air Quality Standard (NAAQS) or any interim milestones of 42 U.S.C. 7506(c)(1). The United States Environmental Protection Agency's (EPA) transportation conformity rules establish the criteria and procedures for determining whether MTPs, TIPs, and federally supported highway and transit projects conform to the SIP, 40 CFR Parts 51.390 and 93.

On Feb. 16, 2018, the United States Court of Appeals for the District of Columbia Circuit in *South Coast Air Quality Mgmt. District v. EPA* ("South Coast II," 882 F.3d 1138) held that transportation conformity determinations must be made in areas that were either nonattainment or maintenance for the 1997 ozone NAAQS and attainment for the 2008 ozone NAAQS when the 1997 ozone NAAQS was revoked. These conformity determinations were required in these areas after Feb. 16, 2019. Cass County was in maintenance at the time of the 1997 ozone NAAQS revocation on April 6, 2015, and was also designated attainment for the 2008 ozone NAAQS on May 21, 2012. It was also designated attainment for the 2015 ozone NAAQS on Aug. 3, 2018. Therefore, per the South Coast II decision, this conformity determination on the MTP and TIPs is being made for the Cass County maintenance area for the 1997 ozone NAAQS.

This conformity determination was completed consistent with CAA requirements, existing associated regulations at 40 CFR Parts 51.390 and 93, and the *South Coast II* decision,

according to EPA's *Transportation Conformity Guidance for the South Coast II Court Decision* issued on Nov. 29, 2018.

## **1.0 Background**

### **1.1 Transportation Conformity Process**

The concept of transportation conformity was introduced in the CAA of 1977, which included a provision to ensure that transportation investments conform to the state's SIP for meeting federal air quality standards. Conformity requirements were made substantially more rigorous in the CAA Amendments of 1990. The transportation conformity regulations that detail implementation of the CAA requirements were first issued in November 1993 and have been amended several times. The regulations establish the criteria and procedures for transportation agencies to demonstrate that air pollutant emissions from MTPs, TIPs and projects are consistent with ("conform to") the state's air quality goals in the SIP.

Transportation conformity is required under CAA Section 176(c) to ensure that federally supported transportation activities are consistent with ("conform to") the purpose of a state's SIP. Transportation conformity establishes the framework for improving air quality to protect public health and the environment. Conformity to the purpose of the SIP means Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) funding and approvals are given to highway and transit activities that will not cause new air quality violations, worsen existing air quality violations, or delay timely attainment of the relevant air quality standard, or any interim milestone.

### **1.2 Conformity Area**

The conformity area consists of Cass County. Within the boundary is part of the metropolitan planning organization (MPO) of NATS (core cities of Niles and Buchanan), as well as the rural projects contained in the STIP in Cass County.

Findings of this transportation conformity report are for transportation activities contained within the 1997 ozone maintenance area.

### **1.3 Attainment Status**

On April 15, 2004, the EPA issued final designations of areas not attaining the 1997 ozone NAAQS. Cass County was designated a nonattainment area.

On May 16, 2007, the EPA redesignated the area attainment, approving and finding adequate

motor vehicle emissions budgets for volatile organic compounds (VOC) and nitrogen oxides (NOx) for the year 2018. The area was placed into maintenance; this requires conformity emissions to be compared to the motor vehicle emission budgets contained in the SIP.

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 metropolitan planning organizations (MPOs) to have a conformity in place on Feb. 16, 2019, and conduct conformity going forward.

On Aug. 3, 2018, the EPA designated Cass County as attainment for the strengthened 2015 ozone NAAQS.

This qualitative report is for the Cass County 1997 ozone orphan maintenance area.

## **2.0 Metropolitan Transportation Plan or Long-Range Transportation Plan**

The Metropolitan Transportation Plan (MTP), also referred to as a Long-Range Transportation Plan (LRTP), is developed by the MPO to establish a long-term transportation plan. An MTP is federally required for MPOs to receive federal funding and must provide a 20-year (or longer) horizon. Plans are required to be updated every four to five years. The purpose of MTP is to assess future needs of the area's transportation system and set goals to meet those needs. The planning process can enhance quality of life by fostering the mobility of people and freight in an effective and safe method.

The last conformity determination for this maintenance area was conducted for the new 2050 MTP and 2023-2026 TIP, receiving a letter supporting the conformity findings from FHWA/FTA

on Sept. 8, 2023. Findings of this transportation conformity report are for transportation activities contained within the conformity area.

### **3.0 Transportation Improvement Program**

The TIP is a financially constrained four-year program covering the most immediate implementation priorities for transportation projects and strategies from the MTP.

The TIP identifies proposed projects developed by local agencies in accordance with the joint regulations of the FHWA and the FTA. These regulations establish the TIP as the programming phase of the overall continuing, comprehensive and cooperative planning process. This planning process includes local jurisdictions, transit agencies, and state and federal transportation officials.

Findings of the transportation conformity report are for transportation activities contained within the conformity area. The NATS and the STIP are developing new 2026-2029 TIPs. This conformity report is to ensure that the part of NATS and STIP in the 1997 ozone orphan maintenance area in Cass County satisfies their obligation to the CAA. This report evaluates transportation activities contained in:

- The NATS 2026-2029 TIP in Cass County,
- The NATS 2050 MTP in Cass County, and
- The STIP 2026-2029 in Cass County.

### **4.0 Transportation Conformity Determination: General Process**

Per the court's decision in South Coast II, beginning Feb. 16, 2019, a transportation conformity determination for the 1997 ozone NAAQS will be needed in 1997 ozone NAAQS nonattainment and maintenance areas identified by EPA<sup>1</sup> for certain transportation activities, including updated or amended MTPs and TIPs and projects. FHWA/FTA made its initial 1997 ozone conformity determinations for this area on Aug. 7, 2019. Conformity will now be required no less frequently

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<sup>1</sup> The areas identified can be found in EPA's "Transportation Conformity Guidance for the South Coast II Court Decision," EPA-420-B-18-050, available at <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100VQME.pdf>.

than every four years. The current conformity determination report will address transportation conformity for the new 2026-2029 TIPs as well as projects in the NATS 2050 MTP contained in Cass County.

## **5.0 Transportation Conformity Requirements**

### **5.1 Overview**

On Nov. 29, 2018, EPA issued the Transportation Conformity Guidance for the South Coast II Court Decision (EPA-420-B-18-050, November 2018) that addresses how transportation conformity determinations can be made in areas that were nonattainment or maintenance for the 1997 ozone NAAQS when the 1997 ozone NAAQS was revoked but were designated attainment for the 2008 ozone NAAQS in EPA's original designations for this NAAQS (May 21, 2012). The area was designated attainment for the 2008 ozone NAAQS on May 21, 2012, and Aug. 3, 2018, for the 2015 ozone NAAQS.

The transportation conformity regulation at 40 CFR 93.109 sets forth the criteria and procedures for determining conformity. The conformity criteria for MTPs, TIPs and projects includes latest planning assumptions (93.110), latest emissions model (93.111), consultation (93.112), transportation control measures (93.113(b) and (c)), and emissions budget and/or interim emissions (93.118 and/or 93.119).

Transportation conformity for MTPs, TIPs and projects for the 1997 ozone NAAQS areas can be demonstrated without a regional emissions analysis, per 40 CFR 93.109(c). This provision states that the regional emissions analysis requirement applies one year after the effective date of EPA's nonattainment designation for a NAAQS and until the effective date of revocation of such NAAQS for an area. The 1997 ozone NAAQS revocation was effective on April 6, 2015, and the South Coast II court upheld the revocation. As no regional emission analysis is required for this conformity determination, there is no requirement to use the latest emissions model, or budget or interim emissions tests.

Therefore, transportation conformity for the 1997 ozone NAAQS maintenance area in Cass County for the NATS 2050 MTP, 2026-2029 TIP, and STIP projects in Cass County can be demonstrated by showing the remaining requirements in Table 1 in 40 CFR 93.109 have been met. These requirements, which are laid out in Section 2.4 of EPA's guidance and addressed below, include latest planning assumptions (93.110), consultation (93.112), transportation control



measures (93.113), and fiscal constraint (93.108).

## **5.2 Latest Planning Assumptions**

The use of latest planning assumptions in 40 CFR 93.110 of the conformity rule generally apply to regional emissions analysis. In the 1997 ozone NAAQS areas, the use of the latest planning assumptions requirement applies to assumptions about transportation control measures (TCMs) in an approved SIP.

The Michigan SIP does not include any TCMs (refer also to Section 5.4).

## **5.3 Consultation Requirements**

The consultation requirements in 40 CFR 93.112 were addressed both for interagency consultation and public consultation.

Interagency consultation was conducted with NATS, TwinCATS, the Michigan Department of Transportation (MDOT), the Michigan Department of Environment, Great Lakes, and Energy (EGLE), FHWA, FTA, and EPA. A summary of the Michigan Transportation Interagency Workgroup (MITC-IAWG) meeting on April 1, 2025, and relevant interagency consultation correspondence related to this conformity is in Appendix A. Interagency consultation was conducted consistent with Michigan's conformity SIP.

Public consultation will be conducted consistent with planning rule requirements in 23 CFR 450. 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 NATS policy committee makes a determination.

A formal public comment period for this draft conformity report was May 5 - 27, 2025. Public comments received and responses to those comments are in Appendix B.

The NATS policy committee made a formal conformity determination through a resolution on May 27, 2025.

## **5.4 Timely Implementation of Transportation Control Measures**

The Michigan SIP does not include any TCMs.

## **5.5 Fiscal Constraint**

Transportation conformity requirements in 40 CFR 93.108 state that transportation plans and TIPs must be fiscally constrained consistent with the metropolitan planning regulations at 23 CFR part 450. The MTP and 2026-2029 TIPs are fiscally constrained, as demonstrated in the:

- NATS 2026-2029 TIP, Financial Plan section,
- NATS 2050 MTP, Fiscally Constrained Road and Bridge Projects and Fiscally Constrained Public transit Projects sections, and
- Rural STIP 2026-2029 projects in Cass County.

## **6.0 Conclusion**

The conformity determination process completed for the NATS 2026-2029 TIP, NATS 2050 MTP and the 2026-2029 rural STIP in Cass County demonstrates that these planning documents meet the CAA and transportation conformity rule requirements for the 1997 ozone NAAQS.

## **Appendix A: Meeting Summary of Interagency Workgroup**

### **Meeting Summary**

Michigan Transportation Conformity Interagency Workgroup (MITC-IAWG)  
for  
Berrien County 2015 Ozone Nonattainment Area and 1997 Ozone Maintenance Area  
and  
Cass County 1997 Ozone Orphan Maintenance Area  
for  
New 2026-2029 Transportation Improvement Programs  
Teams Meeting: 10 - 11 a.m. (EST) April 1, 2025

### **Welcome and Introductions:**

Members and partners attended the video conference by Teams. The group was welcomed to the MITC-IAWG. Attendees introduced themselves.

#### **In attendance:**

EPA: Michael Leslie  
FHWA: Christina Nicolaides  
EGLE: Breanna Bukowski  
TwinCATS/NATS: Brandon Kovnat  
MDOT: Donna Wittl, Jim Sturdevant, Lane Masoud, Katie Beck, Jon Roberts, Josh Grab, Adrian Stroupe, Sam Hetherington

#### **Not attending:**

FHWA: Jenny Staroska  
FTA: Cecilia Crenshaw  
TwinCATS/NATS: Kim Gallagher  
MDOT: Mark Kloha, Fred Featherly, and Richard Bayus

### **Conformity documents:**

Each of the two documents listed below would be needed, thus a new conformity document for each area. It was explained that the Berrien County ozone nonattainment area covers the Berrien County 1997 ozone maintenance area and would be included in that document. Cass County is only a 1997 ozone orphan maintenance area (OMA). For Berrien County, this will be the first time the moderate SIP motor vehicle emission budgets will be used. The budgets created for the moderate state implementation plan (SIP) are not as sizable as past budgets. The question was asked why the moderate SIP budgets are smaller. It was explained past budgets were maintenance plan budgets. These are rate of further progress budgets. The budgets for the moderate SIP and the forthcoming budgets for the serious SIP have different

requirements than a budget for a maintenance plan. It was mentioned that the budgets in the serious SIP will have more flexibility with VOC and NOx than the moderate SIP did.

The MPO stated the MPO boundary for TwinCATS has expanded, given the last census, and the project list now includes projects in the expanded area. The current travel demand model for TwinCATS has not incorporated the new area but will be in the model now being developed for the next long-range transportation plan (or also known as a metropolitan transportation plan). The new MPO area will continue to be modeled with the statewide model until incorporated into the TwinCATS model.

- 1) Berrien County 2015 Ozone Nonattainment Area Conformity Analysis (requires emission modeling)
- 2) Cass County 1997 Ozone Orphan Maintenance Area (OMA) Conformity Report (qualitative, no emission modeling)

### **Modeling:**

The modeling assumptions below were reviewed, and the group agreed with the methods to be used. It was discussed and agreed upon that for the year 2026 the travel demand model outputs can be interpolated if that year's data is not available in the model.

Analysis years for the Berrien County 2015 ozone nonattainment area:

- 2015 base year of TwinCATS and NATS travel demand models
  - 2025 interim analysis year not more than 10 years apart
  - 2026 attainment year of the 2015 ozone NAAQS - serious  
*Must attain standard by Aug. 3, 2027*
  - 2035 interim analysis year not more than 10 years apart
  - 2045 interim analysis year not more than 10 years apart
  - 2050 last year of MTPs
- a. Emission model: use MOVES5.
  - b. Budgets: use moderate SIP 2015 ozone nonattainment budgets.
  - c. Meteorology data: local 2015 meteorology.

The group discussed if 2015 or 2019 local meteorology data should be used. It was decided that 2015 meteorology data would be used because it was what was used in the SIP.

- d. Speeds: use average speed by MOVES road types by travel demand model time periods.
- e. Vehicle population and age distribution: use year 2015 Secretary of State (SOS) vehicle registrations pulled on Oct 1, 2015.
- f. AVFT: use based on local 2019 vehicle (SOS) data or default data.

The group discussed the use of local 2019 data or defaults for the AVFT. Since the requirement for fuel type was not a requirement when the 2015 vehicle data was processed, that data was not retained. It was agreed that the 2019 local data would be used as it is thought to be closer to actual existing than MOVES default data.

- g. Default data used in MOVES: starts, hoteling (truck parking), idling, fuel, hour VMT fraction.

**Project list review:**

It was stated that the project list provided for the meeting had all the projects on one list, not separated by MPO or rural areas. The list will be separated as needed for the different documents.

There were three projects that the group discussed in detail. All the other projects the group agreed were exempt. Job number 215942, a local road diet project on Red Arrow Highway, is classified as non-exempt and will be modeled in 2035. The previous portions of Red Arrow Highway that have been converted to three lanes are either modeled with the TwinCATS model or are outside the current TwinCATS travel demand model will be modeled in the statewide travel demand model. Job numbers 210875 and 213168 were also classified as non-exempt with open to traffic years after 2026, so will be modeled in 2035. The travel demand modeler will check with the MDOT region office and MPO for specific details before modeling.

**Other:**

The group discussed the naming convention for nonattainment areas. It was explained if the area is a county, then the county name is used. If more than a county, then the CMSA name that was in place when the designations are made is used.

## **Appendix B: Public Comments and Responses**

No comments were received.

## **Appendix C: Projects Evaluated for Conformity**

Attached are the projects evaluated for Cass County at the April 1, 2025, MITC-IAWG meeting.

The list of projects starts on the following page.

Fiscal Year	Job Type	Job#	GPA Type	MPO	County	Responsible Agency	Project Name	Limits	Length	Primary Work Type	Project Description	Phase	Air Quality Classification	Air Quality Comment	Conformity Area	Phase Status	S/TIP Cycle	Fund Source	Template Name	Fed Estimated Amount	State Estimated Amount	Local Estimated Amount	Total Estimated Amount	Total Job Cost	Schedule Obligation Date
2026	Local	220654	S/TIP Line items	Rural	Cass	Cass County	Yaw St	Yaw Street Str #1459 over Dowagiac River, Cass County	0.000	Bridge Replacement	Bridge Replacement	CON	Exempt		Cass OMA	Programmed	23-26	BO	Bridge	\$1,560,000	\$292,500	\$97,500	\$1,950,000	\$1,950,000	10/10/2025
2026	Local	224043	S/TIP Line items	NATS	Cass	Cass County	Fir Rd	Redfield Street to US-12	1.021	Road Capital Preventive Maintenance	Asphalt Overlay	CON	Exempt		Cass OMA	Programmed	23-26	EDD, STL	TEDF Category D, STP - Rural/Flexible	\$194,256	\$50,000	\$30,744	\$275,000	\$550,000	1/9/2026
2026	Trunkline	211812	S/TIP Line items	Rural	Cass	MDOT	M-40	Various routes in Branch, Cass, St. Joseph, and Van Buren County	34.789	Traffic Safety	Installation of all-weather pavement markings and corrugations	CON	Exempt		Cass OMA	Programmed	23-26	HSIP	Traffic And Safety - Safety Programs	\$549,000	\$61,000	\$0	\$610,000	\$615,000	10/10/2025
2026	Trunkline	213341	S/TIP Line items	NATS	Cass	MDOT	Regionwide	All trunkline routes in SWMPC MPO	3.614	Traffic Safety	Application of permanent pavement markings on Southwest Region trunklines	CON	Exempt		Cass OMA	Programmed	23-26	HSIP,VRU	Traffic And Safety - Pavement Markings	\$388,512	\$43,168	\$0	\$431,680	\$3,060,000	1/9/2026
2026	Trunkline	213341	S/TIP Line items	Rural	Cass	MDOT	Regionwide	All trunkline routes outside MPO boundaries	3.614	Traffic Safety	Application of permanent pavement markings on Southwest Region trunklines	CON	Exempt		Cass OMA	Programmed	23-26	HSIP,VRU	Traffic And Safety - Pavement Markings	\$1,277,712	\$141,968	\$0	\$1,419,680	\$3,060,000	1/9/2026
2026	Trunkline	213341	S/TIP Line items	NATS	Cass	MDOT	Regionwide	All trunkline routes in SWMPC MPO	3.614	Traffic Safety	Application of permanent pavement markings on Southwest Region trunklines	PE	Exempt		Cass OMA	Programmed	23-26	HSIP	Traffic And Safety - Pavement Markings	\$2,556	\$284	\$0	\$2,840	\$3,060,000	10/10/2025
2026	Trunkline	213341	S/TIP Line items	Rural	Cass	MDOT	Regionwide	All trunkline routes outside MPO boundaries	3.614	Traffic Safety	Application of permanent pavement markings on Southwest Region trunklines	PE	Exempt		Cass OMA	Programmed	23-26	HSIP	Traffic And Safety - Pavement Markings	\$8,406	\$934	\$0	\$9,340	\$3,060,000	10/10/2025
2026	Trunkline	213371	S/TIP Line items	NATS	Cass	MDOT	Regionwide	All of SWMPC MPO	19.427	Traffic Safety	Pvmt mrkg retroreflectivity readings on trunklines in Southwest Region	CON	Exempt		Cass OMA	Programmed	23-26	HSIP	Traffic And Safety - Pavement Markings	\$1,917	\$213	\$0	\$2,130	\$15,000	10/13/2025
2026	Trunkline	213371	S/TIP Line items	Rural	Cass	MDOT	Regionwide	All routes outside MPO boundaries	19.427	Traffic Safety	Pvmt mrkg retroreflectivity readings on trunklines in Southwest Region	CON	Exempt		Cass OMA	Programmed	23-26	HSIP	Traffic And Safety - Pavement Markings	\$6,305	\$701	\$0	\$7,006	\$15,000	10/13/2025
2026	Trunkline	214141	S/TIP Line items	NATS	Cass	MDOT	US-12	at Beebe Road and Adamsville Road intersections	0.361	Minor Widening	Addition of Left turn lane and Passing Flare	CON	Exempt	Intersections not Modeled	Cass OMA	Programmed	23-26	HSIP	Traffic And Safety - Safety Programs	\$1,233,342	\$137,038	\$0	\$1,370,380	\$1,657,143	10/10/2025
2026	Trunkline	221444	S/TIP Line items	NATS	Cass	MDOT	Regionwide	US-31, US-12 and M-62 locations in the townships of Niles, Milton and Ontwa.	29.461	Road Capital Preventive Maintenance	Crack Seal, Chip Seal, and Fog Seal	CON	Exempt		Cass OMA	Programmed	23-26	ST	Road - Capital Preventive Maintenance	\$2,512,042	\$557,038	\$0	\$3,069,080	\$5,600,000	11/14/2025
2026	Trunkline	221444	S/TIP Line items	NATS	Cass	MDOT	Regionwide	All locations not within the NATS boundaries.	29.461	Road Capital Preventive Maintenance	Crack Seal, Chip Seal, and Fog Seal	CON	Exempt		Cass OMA	Programmed	23-26	ST	Road - Capital Preventive Maintenance	\$1,907,858	\$423,062	\$0	\$2,330,920	\$5,600,000	11/14/2025
2026	Trunkline	221615	S/TIP Line items	NATS	Cass	MDOT	US-12	From West village limit of Edwardsburg to Lane Rd & Brady Rd to Five Points	4.590	Minor Widening	Shoulder Widening	CON	Exempt	No change to vehicle travel lanes	Cass OMA	Programmed	23-26	CRL	Carbon Reduction (Rural)	\$5,299,788	\$1,175,212	\$0	\$6,475,000	\$7,200,000	11/14/2025
2026	Trunkline	221627	S/TIP Line items	NATS	Cass	MDOT	M-51	From White St to Pokagon Hwy	3.200	Minor Widening	Shoulder Widening	CON	Exempt	No change to vehicle travel lanes	Cass OMA	Programmed	23-26	CRL	Carbon Reduction (Rural)	\$1,419,279	\$314,721	\$0	\$1,734,000	\$1,854,000	7/10/2026
2027	Local	224044	S/TIP Line items	Rural	Cass	Cass County	Calvin Center Rd	from Williamsville Street to Jefferies Street	1.748	Road Capital Preventive Maintenance	Milling & asphalt overlay	CON	Exempt		Cass OMA	Programmed	26-29	STL	STP - Rural/Flexible	\$336,150	\$0	\$159,350	\$495,500	\$495,500	1/8/2027
2027	Local	224045	S/TIP Line items	Rural	Cass	Cass County	Marcellus Hwy	Atwood Road to Twin Lakes Road	1.113	Road Capital Preventive Maintenance	Milling & asphalt overlay	CON	Exempt		Cass OMA	Programmed	26-29	STL	STP - Rural/Flexible	\$220,550	\$0	\$48,950	\$269,500	\$269,500	1/8/2027
2027	Local	224046	S/TIP Line items	Rural	Cass	Cass County	Marcellus Hwy	Burlington Road to M-40	0.740	Road Capital Preventive Maintenance	Milling & asphalt overlay	CON	Exempt		Cass OMA	Programmed	26-29	STL	STP - Rural/Flexible	\$147,300	\$0	\$32,700	\$180,000	\$180,000	1/8/2027
2027	Local	224169	S/TIP Line items	NATS	Cass	Cass County	Redfield St	Countyline to Batchelor Rd	1.038	Road Capital Preventive Maintenance	Asphalt Overlay	CON	Exempt		Cass OMA	Programmed	26-29	STU	STP - TMA	\$156,350	\$0	\$34,670	\$191,020	\$191,020	1/8/2027
2027	Local	224171	S/TIP Line items	NATS	Cass	Cass County	Redfield St	Fir Rd to Kline Rd	1.513	Road Capital Preventive Maintenance	Asphalt Overlay	CON	Exempt		Cass OMA	Programmed	26-29	STU	STP - TMA	\$164,650	\$0	\$103,650	\$268,300	\$268,300	1/8/2027
2027	Trunkline	213379	S/TIP Line items	NATS	Cass	MDOT	Southwest Regionwide Pvmt Mrkg Retro Readings	All of SWMPC MPO	28.353	Traffic Safety	Pvmt mrkg retroreflectivity readings on trunklines in Southwest Region	CON	Exempt		Cass OMA	Programmed	26-29	HSIP	Traffic And Safety - Pavement Markings	\$1,406	\$156	\$0	\$1,562	\$11,000	10/1/2026
2027	Trunkline	213379	S/TIP Line items	Rural	Cass	MDOT	Southwest Regionwide Pvmt Mrkg Retro Readings	All routes outside MPO boundaries	28.353	Traffic Safety	Pvmt mrkg retroreflectivity readings on trunklines in Southwest Region	CON	Exempt		Cass OMA	Programmed	26-29	HSIP	Traffic And Safety - Pavement Markings	\$4,623	\$514	\$0	\$5,137	\$11,000	10/1/2026
2027	Trunkline	220408	S/TIP Line items	NATS	Cass	MDOT	US-12	US-12 at Gumwood Road	2.643	Traffic Safety	Install a roundabout	PE	Exempt		Cass OMA	Programmed	26-29	NH	Operations	\$332,263	\$73,678	\$0	\$405,941	\$3,699,615	12/7/2026
2028	Local	224057	S/TIP Line items	Rural	Cass	Cass County	Marcellus Hwy	Dowagiac City limits to Atwood Road	1.004	Road Capital Preventive Maintenance	Milling & asphalt overlay	CON	Exempt		Cass OMA	Programmed	26-29	STL	STP - Rural/Flexible	\$214,500	\$0	\$47,500	\$262,000	\$262,000	1/7/2028
2028	Local	224058	S/TIP Line items	Rural	Cass	Cass County	Pokagon Hwy	Oak Grove Road to Cassopolis Village limits	1.736	Road Capital Preventive Maintenance	Milling & asphalt overlay	CON	Exempt		Cass OMA	Programmed	26-29	STL	STP - Rural/Flexible	\$415,000	\$0	\$92,000	\$507,000	\$507,000	1/7/2028
2028	Local	224172	S/TIP Line items	NATS	Cass	Cass County	Redfield St	M-62 to Brande Creek / Gast Ditch	0.842	Road Capital Preventive Maintenance	HMA Overlay	CON	Exempt		Cass OMA	Programmed	26-29	ST, STU	STP - TMA	\$98,460	\$0	\$60,040	\$158,500	\$317,000	1/7/2028
2028	Trunkline	202654	S/TIP Line items	NATS	Cass	MDOT	Countywide	Signing Upgrade, Signing Update	124.001	Traffic Safety	Non-Freeway Sign Replacement	CON	Exempt		Cass OMA	Programmed	26-29	STG	Traffic And Safety - Signs	\$177,000	\$0	\$0	\$177,000	\$2,100,000	11/12/2027
2028	Trunkline	202654	S/TIP Line items	Rural	Cass	MDOT	Countywide	Signing Update	124.001	Traffic Safety	Non-Freeway Sign Replacement	CON	Exempt		Cass OMA	Programmed	26-29	STG	Traffic And Safety - Signs	\$1,573,000	\$0	\$0	\$1,573,000	\$2,100,000	11/12/2027
2028	Trunkline	220408	S/TIP Line items	NATS	Cass	MDOT	US-12	US-12 at Gumwood Road	2.643	Traffic Safety	Install a roundabout	ROW	Exempt		Cass OMA	Programmed	26-29	NH	Operations	\$24,895	\$5,521	\$0	\$30,416	\$3,699,615	12/6/2027
2029	Local	223927	S/TIP Line items	NATS	Cass	Cass County	Old M-205	Stateline to US-12	1.675	Road Capital Preventive Maintenance	Milling & asphalt overlay	CON	Exempt		Cass OMA	Programmed	26-29	EDD, STL	TEDF Category D, STP - Rural/Flexible	\$225,000	\$50,000	\$0	\$275,000	\$550,000	1/5/2029
2029	Local	224059	S/TIP Line items	NATS	Cass	Cass County	Bell Rd	Ironwood Drive to US-12	0.411	Road Capital Preventive Maintenance	Asphalt Overlay	CON	Exempt		Cass OMA	Programmed	26-29	STL	STP - Rural/Flexible	\$70,200	\$0	\$15,570	\$85,770	\$85,770	1/5/2029
2029	Local	224188	S/TIP Line items	NATS	Cass	Berrien County	Ironwood Dr	Redfield St to Bell Rd	1.760	Road Capital Preventive Maintenance	HMA Overlay	CON	Exempt		Cass OMA	Programmed	26-29	STU	STP - TMA	\$317,875	\$0	\$133,125	\$451,000	\$451,000	1/5/2029
2029	Trunkline	220408	S/TIP Line items	NATS	Cass	MDOT	US-12	US-12 at Gumwood Road	2.643	Traffic Safety	Install a roundabout	CON	Exempt		Cass OMA	Programmed	26-29	NH,HSIP	Operations	\$2,670,976	\$592,282	\$0	\$3,263,258	\$3,699,615	10/6/2028