

# Fiscal Year 2022 Local Federal Fund Exchange Program Report

March 7, 2023

## Background

In the fall of 2015, the County Road Association (CRA) proposed a Local Federal Fund Exchange (LFFE) Program to the Rural Task Force (RTF) Program Advisory Board. The RTF Program Advisory Board agreed to begin a pilot program to assess the validity of an exchange program. To ensure State Transportation Improvement Program (S/TIP) stability, and as the stewards of the federal aid process, the Michigan Department of Transportation (MDOT) agreed to an exchange program and developed suitable guidelines. Steve Puuri from CRA, Denise Jones, Eric Mullen, and Pam Boyd, all from MDOT, worked together to develop the LFFE Program Pilot Guidelines and Procedures document. Sample agreements and procedures were developed and put into place. The pilot called for a limit of five federal fund exchanges, to allow for any issues to be worked out.

Although there were several entities negotiating federal fund exchanges in Fiscal Year (FY) 2016, only one exchange, Montcalm County to Kent County, took place. The lack of exchanges in FY 2016 was attributed to the timing of the completed guidelines and procedures, as well as additional questions that were raised by potential participants.

The pilot was continued in FY 2017 and the exchanges remained limited to five transactions. There were five LFFE transactions completed in FY 2017. Concerns raised by RTF Program Advisory Board members and MDOT management were addressed with updates to the FY 2018 LFFE Program Guidelines. Appendix A, *The Rural Task Force (RTF) Local Federal Fund Exchange Program Proposal for FY 2018*, documents those concerns and changes to the 2018 guidelines. The exchange agreement was not changed from the original template developed in 2015. The FY 2018 LFFE Program was expanded to allow 15 exchanges. Steve Puuri created a webpage on the CRA website that assisted buyers and sellers to identify potential partners for fund exchanges. This site also outlined the exchanges, funding amounts, rate of exchange, and the date the agreements were signed. Thirteen exchanges were successfully executed in FY 2018.

In FY 2018, a more formal process for handling the exchanges was developed. This included requesting transfers of Surface Transportation Block Grant (STBG) allocation and obligation authority through the MDOT finance office, notification to the participating counties, and the MDOT Local Agency Programs (LAP). A *Selling County Project Information* spreadsheet was developed and distributed to all the selling counties, to track the local funds that were exchanged for the federal STBG funds. This spreadsheet documented that those projects, previously listed on the S/TIP by the selling county, were completed.

In FY 2019, the LFFE Program was expanded to allow 30 exchanges. The Program Guidelines were updated to outline how a county road commission may enter into an agreement with a city or village that has a project in the S/TIP to include those funds in the county's exchange with the understanding that the city or village project will be funded with a portion of the non-federal exchanged funds. The specifics of this agreement are the responsibility of the parties involved.

The Agreement Template was also updated for FY 2019 with the change in the trigger for the Buyer to pay the Seller. The old trigger was the date of obligation of the Buyer's project. It is now the date that the allocation transfer that is confirmed by MDOT staff. This was done to protect the Seller in case the Buyer did not get their project obligated in the specific fiscal year.

Lastly, the Program Guidelines were updated to include reporting requirement instructions.

In FY 2020, the RTF Exchange Templates and Allocation Accounts were created for the five urban counties to hold the allocation transferred to them from an exchange. These allocations point to the Local RTF obligation authority which has an obligation guarantee that state that any project with a complete biddable package submitted to MDOT Local Agency Programs will be obligated that fiscal year or off the top of the next fiscal year. This protects the Buyers utilizing the new trigger of the point of allocation transfer confirmation in the 2019 agreement template.

There were no other changes to the program in FY 2022. The guidelines for the program can be found on the [MDOT RTF page](#).

### History of LFFE Program Exchanges

Year	Number of Exchanges
2016	1
2017	5
2018	13
2019	18
2020	17
2021	6
2022	14

### Description of FY 2022 Program

In the FY 2022 program, 14 exchanges were executed. A total of \$9,078,037 of federal funds were exchanged. The increased number of exchanges in FY 2022 was likely due to the increased certainty of local fund availability. Below is a listing of the participating counties.

Selling County	Selling RTF	Selling Amount	Buying County	Buying RTF	Payback Amount	Date of Agreement
Mecosta	8A	\$920,355.00	Clare	7C	\$736,284.00	July 15, 2021
Gladwin	7C	\$688,037.00	Bay	7B	\$550,429.60	September 10, 2021
Arenac	7D	\$382,074.00	Clinton	6	\$305,659.20	December 28, 2021
Montcalm	8A	\$1,041,563.00	Kent	Urban	\$781,173.00	December 29, 2021
Baraga	13A	\$554,159.00	Oakland	Urban	\$443,327.20	September 9, 2021
Osceola	8A	\$736,319.00	Oakland	Urban	\$589,055.20	July 22, 2021
Keweenaw	13A	\$230,000.00	Oakland	Urban	\$184,000.00	July 22, 2021
Barry	3	\$780,000.00	Oakland	Urban	\$624,000.00	July 8, 2021
Dickinson	12B	\$297,200.00	Oakland	Urban	\$237,760.00	September 9, 2021
Emmet	10A	\$758,598.00	Oakland	Urban	\$606,886.40	May 20, 2021
Allegan	8B	\$1,435,298.00	Macomb	Urban	\$1,148,238.40	January 20, 2022
Antrim	10A	\$464,277.00	Macomb	Urban	\$371,421.60	January 20, 2022
Cass	4	\$453,157.00	Macomb	Urban	\$362,525.60	January 20, 2022
Iron	13B	\$337,000.00	Macomb	Urban	\$269,600.00	January 20, 2022
<b>Total federal funds exchanged</b>		<b>\$9,078,037.00</b>				

## **Summary**

The information provided by the Selling Counties demonstrates that the program was beneficial to the participating agencies and the communities they served. The exchanges were negotiated after project selection to ensure that other RTF members were not negatively affected by the exchange. All the FY 2022 S/TIP projects that the federal funds were exchanged from were built or are in the process of being built and scheduled for completion before the end of this fiscal year.

The information compiled from the *Selling County Project Information* spreadsheets for the FY 2022 LFFE Program is included in Appendix B. Comments provided by the Sellers as to the value of the program are included in Appendix C. The value of the program can be seen in Appendix B where it is shown by the scope increases and additional projects completed with the exchanged funds remaining after the S/TIP project was completed.

## Appendix A

### The Rural Task Force Local Federal Fund Exchange Program Proposal for FY 2018

November 2, 2017

It is the responsibility of MDOT to ensure stability of the S/TIP including a fair and transparent process for project selection and adherence to the federal transportation planning process. MDOT is recommending changes to the LFFE Program to uphold this responsibility. With the expansion of the LFFE Program, it is to be made available to all RTF agency members, including small cities, villages, and transit agencies (as outlined in the Recommendations under Issue 4).

Below is a summary of issues and recommendations that have been compiled from a MDOT staff report (that evaluated the FY 2016 and FY 2017 LFFE Program pilot), notes from meetings and internal MDOT discussions.

#### Note:

The term “federal-aid projects” includes all “federal-aid eligible activities” listed in the S/TIP.

#### 1. Issue

To ensure that federal funds are used appropriately and verify that the non-federal transportation dollars are used to implement the seller’s original federal-aid project(s), as prioritized within the RTF project selection process.

#### Recommendations

- The LFFE Program agreements will be modified to specify the federal-aid project(s) and funding amounts, that the buying and selling agencies will utilize. Rural funding must be utilized on federal aid projects, in rural counties, as well as rural areas within urban counties (as defined by the adjusted census urban boundary).
- If the selling agency does not intend to utilize the non-federal transportation dollars that they have obtained for the prioritized federal-aid project(s), then MDOT may not allow the agreement to move forward.

#### 2. Issue

Ensure that stability of the S/TIP is maintained, particularly in the first two years of the S/TIP, as required by FHWA.

#### Recommendation

- In addition to the recommendations above, to ensure that the current year federal-aid project(s) in the S/TIP are not abandoned, the LFFE Program agreements will be modified to specify the federal-aid project(s) and funding amounts, that the buying and selling agencies will utilize.

### **3. Issue**

Federal-aid exchanges of future year funding are problematic because of the uncertainty of the amount of federal aid and the lack of ability to track any future year dollars in any financial system at MDOT.

#### **Recommendations**

- Federal-aid exchanges will remain limited to current fiscal year exchanges. Federal funds must be obligated in the year of allocation to avoid fiscal constraint issues in the S/TIP.
- The ability to bank non-federal transportation dollars and use them in subsequent years is allowed, on a limited basis, to fund larger scale projects and should be maintained as part of the Program. MDOT staff will work with the CRA Engineering Specialist to update the FY 2018 LFFE Program guidelines and agreements. These updates will include a tracking protocol that will identify future non-federal transportation dollar project(s) (or activities) and the year of project implementation. A two-year limit will apply to the banking of non-federal transportation dollars.

### **4. Issue**

The concerns expressed by RTF Program Advisory Board members, regarding the reduction in funding due to counties participating in the LFFE Program, could negatively impact the total funding available within the individual RTF.

#### **Recommendations**

- Implementation of the RTF prioritized federal aid project(s) utilizing non-federal transportation dollars, must be in adherence to the RTF project selection process (ensuring participation from counties, small cities, villages, and transit agencies), thus safeguarding against negative financial impacts to all agencies within the RTF.
- MDOT, working with CRA, made the LFFE Program pilot available to the County Road agencies. However, with the expansion of the LFFE Program, it is to be made available to all RTF agency members (including small cities, villages, and transit agencies).
- Recognizing that other agencies have not been involved in the development and review of the current LFFE Program, if there is interest from other RTF agencies to participate, MDOT will work with the RTF Program Advisory Board and the requesting RTF agencies, such as Michigan Municipal League (MML) and Transit Association members, to determine the applicability and logistics of participating in the Program and establish the process and methodology for participation. The objective in subsequent years is to have one program agreement that can be utilized by all participants in the LFFE Program.

### **5. Issue**

Tracking those projects or activities using non-federal transportation dollars coming back to the selling agency (to ensure that S/TIP stability and the impacts to the federal aid system, can be evaluated and demonstrated).

## **Recommendations**

- It is the expectation of MDOT that the RTF members will proactively work with their Regional Planning Agency (RPA) representative to monitor and track all project and funding exchanges and to ensure accuracy of financial reports pertaining to the exchange of federal and state funds.
- MDOT staff will work with the CRA Engineering Specialist to update the FY 2018 LFFE Program guidelines and agreements. This will include reporting requirements from the selling agency to the appropriate RPA representative. This information will then be included in the monthly status report, which is sent from the RPA representative to the MDOT RTF staff.

Note: The Act 51 report is not an effective tool for tracking federal aid exchange projects or activities, due to the timeline in which they are submitted (May) and approved (September) of the following fiscal year.

## **6. Issue**

Changing federal aid allocation estimates are not specifically addressed in the current LFFE Program agreements.

## **Recommendations**

- The funding amount identified in the LFFE Program agreements is (and shall remain) for a specified dollar amount. If the buyer and seller choose to adjust the agreement, an amended agreement is required, and a copy is to be provided to the MDOT RTF Program Manager.
- If there is a significant dollar change to the original agreement (exceeding \$10,000), then the amended agreement amount would need to be approved by the appropriate RTF committee (to ensure fair distribution of funds between all agencies on the RTF committee). A copy of the updated agreement and RTF meeting notes are also to be submitted to the MDOT RTF Program Manager.

## **7. Issue**

To ensure adherence of the objectives of the LFFE Program, non-federal transportation dollars that are returned to the seller must be used as outlined in the guidelines and agreements.

## **Recommendation**

- MDOT staff will work with the CRA Engineering Specialist to update the FY 2018 LFFE Program guidelines and agreements to include language, stating that agencies that do not follow Program guidelines, the terms of the agreement or misuse the Program funds, will not be allowed to participate in the LFFE Program for the next four years without MDOT approval.

## **8. Issue**

Request for expansion of LFFE Program.

### **Recommendations**

- Expanding the Program from five to fifteen transactions is acceptable for FY 2018, provided these recommendations are included in the LFFE Program guidelines and agreements, and MDOT receives timely tracking, reporting and accurate project updates from the RPA representatives (for assessment of the Program expansion).
- Prior to the expansion of the LFFE Program in subsequent years, MDOT will evaluate the LFFE Program. The focus will be in respect to ensuring adherence to guidelines, STIP stability, and tracking of the Program are followed. MDOT is confident that expansion of the Program is achievable, through a cooperative effort between the RTF members, RPA representatives, the RTF Program Advisory Board and MDOT.
- MDOT will provide an evaluation of the FY 2018 LFFE Program and recommended changes (if any) for the FY 2019 LFFE Program, at the RTF Program Advisory Board meeting in August 2018. Following the RTF Program Advisory Board meeting, MDOT staff will work with the CRA Engineering Specialist to finalize the FY 2019 LFFE Program guidelines and agreements, no later than October 1, 2018.

## **9. Issue**

Consideration that a date should be set for LFFE Program agreements to be in place.

### **Recommendations**

- MDOT will allow participation in the LFFE Program as late as March 31, within that fiscal year. This date is to ensure that participating agencies have the ability to obligate the funding within that fiscal year (particularly for the buying agency).
- Any agreements requested after March 31, shall only be considered by MDOT, on a case-by-case basis. Consideration factors will include the amount of obligation authority remaining, the status of project plans for delivery, etc. Each written request would require written MDOT acceptance (email is acceptable), prior to the execution of the agreement.

Note: The buying agency shall assume the risk of losing the ability of utilizing these funds, should their project not be obligated within that FY.

### **Summary**

Based upon analysis of the FY 2016 and FY 2017 LFFE Program pilot, MDOT recommends that program enhancements outlined above be added to the LFFE Program guidance and agreements, to enable better evaluation, monitoring and reporting. Once agreement is reached on all of the above recommendations, MDOT staff will work with the CRA Engineering Specialist to update the FY 2018 LFFE Program guidelines and agreements, to reflect these enhancements.

This guidance will be included in the information packet for the RTF Program Advisory Board meeting, scheduled for November 2, 2017.

**Appendix B**

**2022 Local Federal Fund Exchange Seller Information**

Note that many counties report on the total cost of the projects that they applied the exchanged funds to rather than just the portion of exchanged funds used on the project. These projects were originally programmed with federal and local funds, sometimes Transportation Economic Development Fund Category D, so the total project cost would exceed the federal funds exchanged.

<b>Allegan \$1,148,238.40 Received from exchange</b>							
Job Number	Fiscal Year	Project Name	Limits	Project description	Completed Date	Project Cost	Benefit of Participating in LFFE Program
216468	2022	Blue Star Hwy	111th avenue to 118th Avenue	Crush & Shape & Asphalt Resurfacing	8/8/2022	\$1,339,039.13	The LFFE program provided us with the scheduling flexibility needed to complete the project on time in 2022. In addition to much more control over the schedule for the bid letting and the construction timeline we saw significant savings over our estimate and in both design and construction engineering costs.
<b>Antrim \$371,421.60 Received from exchange</b>							
Job Number	Fiscal Year	Project Name	Location/Limits	Project description	Completed Date	Project Cost	Benefit of Participating in LFFE Program
212803	2022	Atwood Road	US-31 to Church Street	One course asphalt overlay	7/29/2022	\$1,032,541.00	Quick turn around with bid proposal. Saves valuable road commission resources in administering the project from scoping through construction and close out. This project resulted in an Asphalt Pavement Association of Michigan Award of Merit for a Single Course Overlay.
<b>Arenac \$305,659.20 Received from exchange</b>							
Job Number	Fiscal Year	Project Name	Limits	Project description	Completed Date	Project Cost	Benefit of Participating in LFFE Program
216362	2022	E Twining Rd	Tonkey Road to US-23	One Course Asphalt Overlay	8/6/2022	\$443,420.00	Being a small road commission, we don't have the staffing so we have to contract out the Engineering, Inspection and Office Technician costs. Having the ability to participate in the program is a huge cost savings for us and allows the project to be completed in a timely manner.
<b>Baraga \$443,327.20 Received from exchange</b>							
Job Number	Fiscal Year	Project Name	Limits	Project description	Completed Date	Project Cost	Benefit of Participating in LFFE Program
216424	2022	Pelkie Road	Otter River Bridge to Houghton County Line	Crush & Shape & Asphalt Resurfacing	Anticipated - 9/30/2023 with March 2023 letting	\$323,327.00	1- Leveraging other funding sources, partners and opportunities. 2- Reduced Design and Construction 3- Engineering costs as compared to Federal Fund requirements to deliver the project. 4- Flexibility in scheduling Local Letting and project completions. 5- Coordinate other improvements and ability to expand project limits and work items.
216425	2022	Imperial Heights Road	M28 to Red Road also known as Spurr Court	Crush & Shape & Asphalt Resurfacing	12/31/2022	\$120,000	
<b>Barry \$624,000.00 Received from exchange</b>							
Job Number	Fiscal Year	Project Name	Limits	Project description	Completed Date	Project Cost	Benefit of Participating in LFFE Program
206904	2022	W State Road	Countywide Preventative Maintenance	One Course Asphalt Overlay	8/16/2022	\$765,451	By using the FFE, BCRC was able to bid the HMA overlay of W. State Rd with a larger bid package of asphalt paving throughout Barry County that totaled 24+ miles of HMA work. This led to bid prices around \$70/ton and included a 4% total bid deduct from the awarding contractor resulting from an award for all of the paving work throughout the county being awarded to that respective bidder. Current AUP on MERL list 36A HMA at \$104/ton. Obviously, a significant savings on this project as well as the large amount of additional paving that was completed in Barry County in 2022. The economies of scale realized by this process saved on our local paving work and allowed the FFE funds to go further!
<b>Cass \$362,525.60 Received from exchange</b>							
Job Number	Fiscal Year	Project Name	Limits	Project description	Completed Date	Project Cost	Benefit of Participating in LFFE Program
207175	2022	Barron Lake Road	Cook Street to Pokagon Highway	Milling & One Course Asphalt Overlay	7/19/2022	\$408,459.00	The ability to perform the work allowed us to reduce construction and inspection costs compared to an MDOT bid project.
207179	2022	Calvin Center Road	Jeffries Street to Bonnie Street	Milling & One Course Asphalt Overlay	11/2/2022	\$155,114.94	
<b>Dickinson \$237,760.00 Received from exchange</b>							
Job Number	Fiscal Year	Project Name	Limits	Project description	Completed Date	Project Cost	Benefit of Participating in LFFE Program
212179	2022	County Road 577	5000 ft north of Menominee County Line north .5 mile	Crush & Shape & Asphalt Resurfacing	Anticipated - 7/1/2023 Letting occurred 6/7/2022	\$237,760.00	Project and administration costs are reduced.
<b>Emmet \$606,886.40 Received from exchange</b>							
Job Number	Fiscal Year	Project Name	Limits	Project description	Completed Date	Project Cost	Benefit of Participating in LFFE Program
206014	2022	E Levering Road	Pleasantview Rd. to US31	Asphalt Reconstruction	9/1/2022	\$1,322,080.16	The Road Commission was able to extend project limits originally scoped from Pleasantview Rd. to 0.33 miles east of Bill Rd.
<b>Gladwin \$550,429.60 Received from exchange</b>							
Job Number	Fiscal Year	Project Name	Limits	Project description	Completed Date	Project Cost	Benefit of Participating in LFFE Program
206758	2022	Countywide	Various Locations	Ultra-Thin Asphalt Overlay (3/4")	9/1/2022	\$907,000.00	Reduced cost of project and administration.
<b>Iron \$269,600.00 Received from exchange</b>							
Job Number	Fiscal Year	Project Name	Limits	Project description	Completed Date	Project Cost	Benefit of Participating in LFFE Program
206914	2022	Baumgartner Rd	Bonifas westerly 1.35 miles to Snipe Farm	Crush & Shape & Asphalt Resurfacing	9/29/2022	\$366,985.00	Through bidding locally along with our other in-house projects, we were able to leverage the saving from the original bid estimate (and project limits), with additional local funds to reconstruct an additional 1,100 feet.
<b>Keweenaw \$184,000.00 Received from exchange</b>							
Job Number	Fiscal Year	Project Name	Limits	Project description	Completed Date	Project Cost	Benefit of Participating in LFFE Program
215717	2022	Gratiot Lake Road	2.78 miles south of US41 thence 1.2 miles south	One Course Asphalt Overlay	7/31/2022	\$193,887.00	The design, bidding, admin., and construction admin. costs for the road commissioner is significantly less for the LFFE projects. Also, the time to administer the project from programming to construction completion was much less. This is a great, efficient means for county road commissions to complete projects more effectively. Hope the programs continues for many years.
<b>Mecosta \$736,284.00 Received from exchange</b>							
Job Number	Fiscal Year	Project Name	Limits	Project description	Completed Date	Project Cost	Benefit of Participating in LFFE Program
116166	2022	175th Avenue	Angling Road to Garfield Road and New Millpond Road from Garfield Road to Byers Creek	Reconstruction	9/14/2022	\$546,711.93	We were able to reduce construction costs and utilize township matching funds to reconstruct more roads for this fiscal year than originally planned.
214653	2022	4 Mile Rd	180th to US131	Reconstruction	10/1/2022	\$94,786.00	
N/A	2022	180th Rd	Northland to Northland	Reconstruction	10/1/2022	\$94,786.00	
<b>Montcalm \$781,173.00 Received from exchange</b>							
Job Number	Fiscal Year	Project Name	Limits	Project description	Completed Date	Project Cost	Benefit of Participating in LFFE Program
206969	2022	CR599 (Federal Road)	Village of Sand Lake to CR522 (Stanton Road)	One Course Asphalt Overlay Pave Wide Shoulders	9/30/2022	\$316,970.00	Our countywide material bid prices are lower than if let through the MDOT system. This allows us a larger projects scope which in turn completes more roadwork.
214733	2022	N Lakeview Rd	Village of Lakeview limits to North County Line Rd	One Course Asphalt Overlay	9/30/2022	\$123,384.00	
<b>Osceola \$589,055.20 Received from exchange</b>							
Job Number	Fiscal Year	Project Name	Limits	Project description	Completed Date	Project Cost	Benefit of Participating in LFFE Program
127179	2022	5th Avenue	Countywide	Single Course Chip Seal	10/31/2022	\$665,988.96	Project and administration costs are reduced.



## Appendix C

### Summary of Responses

#### **Allegan County**

The LFFE program provided us with the scheduling flexibility needed to complete the project on time in 2022. In addition to much more control over the schedule for the bid letting and the construction timeline we saw significant savings over our estimate and in both design and construction engineering costs.

#### **Antrim County**

Quick turn around with bid proposal. Saves valuable road commission resources in administering the project from scoping through construction and close out. This project resulted in an Asphalt Pavement Association of Michigan Award of Merit for a Single Course Overlay.

#### **Arenac County**

Being a small road commission, we don't have the staffing, so we have to contract out the Engineering, Inspection and Office Technician costs. Having the ability to participate in the program is a huge cost savings for us and allows the project to be completed in a timely manner.

#### **Baraga County**

- 1- Leveraging other funding sources, partners and opportunities.
- 2- Reduced Design and Construction
- 3- Engineering costs as compared to Federal Fund requirements to deliver the project.
- 4- Flexibility in scheduling Local Letting and project completions.
- 5- Coordinate other improvements and ability to expand project limits and work items.

#### **Barry County**

By using the LFFE, BCRC was able to bid the HMA overlay of W. State Rd with a larger bid package of asphalt paving throughout Barry County that totaled 24+ miles of HMA work. This led to bid prices around \$70/ton and included a 4% total bid deduct from the awarding contractor resulting from an award for all of the paving work throughout the county being awarded to that respective bidder. Current AUP on MERL list 36A HMA at \$104/ton. Obviously, a significant savings on this project as well as the large amount of additional paving that was completed in Barry County in 2022. The economies of scale realized by this process saved on our local paving work and allowed the LFFE funds to go further!

#### **Cass County**

The ability to perform the work allowed us to reduce construction and inspection costs to an MDOT bid project.

#### **Emmet County**

The Road Commission was able to extend project limits originally scoped from Pleasantview Rd. to 0.33 miles east of Bill Rd.

#### **Gladwin County**

Reduced cost of project and administration.

**Iron County**

Through bidding locally along with our other in-house projects, we were able to leverage the saving from the original bid estimate (and project limits), with additional local funds to reconstruct an additional 1,100 feet.

**Keweenaw County**

The design, bidding, admin., and construction admin. costs for the road commissioner is significantly less for the LFFE projects. Also, the time to administer the project from programming to construction completion was much less. This is a great, efficient means for county road commissions to complete projects more effectively. Hope the programs continues for many years.

**Mecosta County**

We were able to reduce construction costs and utilize township matching funds to reconstruct more roads for this fiscal year than originally planned.

**Montcalm County**

Our countywide material bid prices are lower than if let through the MDOT system. This allows us a larger projects scope which in turn completes more roadwork.

**Osceola County**

Project and administration costs are reduced.