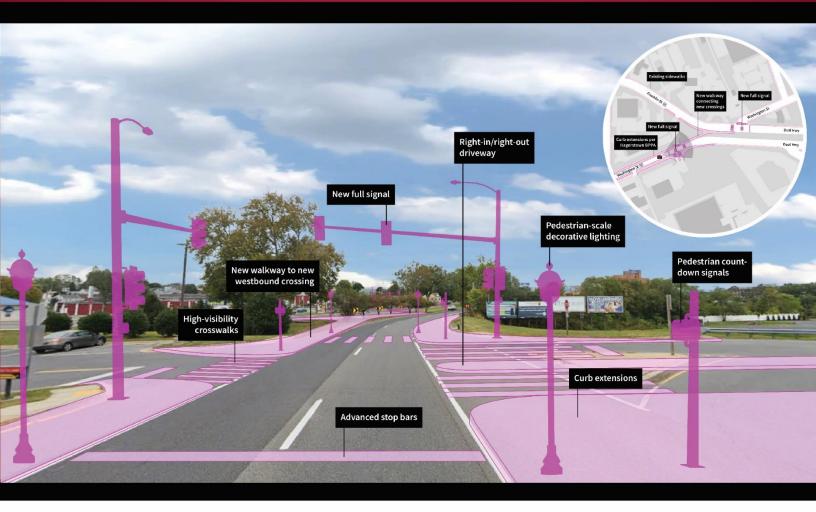
# Reconnecting US 40 (Dual Highway) – Planning for Community Prosperity and Equitable Connections

**Reconnecting Communities and Neighborhoods (RCN) Program - Community Planning Grant** 



### US 40 (Dual Highway) from Cannon Avenue to All Star Court

Hagerstown, Maryland



September 2023



#### A. <u>Overview</u>

The City of Hagerstown, located in Washington County, is rich in both local and national history. Nicknamed the "Hub City," Hagerstown, Maryland, has functioned as a historic transportation center since multiple railroad companies arrived in the area around 1834. Over time, the regional roads replaced railroads as the main form of transportation. US 40 became a key corridor for the City – running through downtown and connecting the City to other regions and I-70. Unfortunately, the current design of US 40, also known as Dual Highway on the east side, creates a significant burden for the community. It has been designated a Priority Corridor in Maryland's recently completed Pedestrian Safety Action Plan.

During the past five years, 388 automobile crashes have occurred along the 2.9-mile section of Dual Highway in Hagerstown, including six fatalities and multiple bicycle and pedestrian injuries. High volumes, high speeds, incomplete sidewalk connectivity, and limited crosswalks along this four-lane, divided arterial roadway impede and disrupt connections to the surrounding communities. The 'Reconnecting US 40 (Dual Highway) – Planning for Community Prosperity and Equitable Connections' study will engage the community to determine specific opportunities to enhance access and mobility on the corridor, unlocking Hagerstown's future as a modern and inclusive transportation hub.

As facility owner and lead applicant, the Maryland Department of Transportation (MDOT) State Highway Administration (SHA), in coordination with the City of Hagerstown, the Hagerstown Eastern Panhandle Metropolitan Planning Organization (HEPMPO), and Washington County, is seeking a Community Planning Grant in federal aid under the Reconnecting Communities and Neighborhoods (RCN) Program. SHA is applying for a \$1.6 million grant with \$400,000 matching funds through both the Neighborhood Access and Equity (NAE) program and/or the Reconnecting Communities Pilot. The grant will fund a Planning and Environmental Linkages (PEL) study, including community engagement, for US 40 (Dual Highway). This application represents the collective efforts of these four agencies to improve the corridor.

The goal of the PEL Study is to directly address community burdens in consultation with local communities and stakeholders by identifying inequitable access and service throughout the study area and developing context-sensitive solutions to address them. The City maintains a rich African-American legacy and served as a former safe stop on the Underground Railroad via the Ebenezer AME church. It is



Figure 1: Project Location (39.639886, -77.714429, Northern Terminus)

also the site of baseball legend Willie Mays' minor league baseball debut. Throughout the process, the PEL Study will help identify specific opportunities to remove physical barriers to access and mobility, as well as economic barriers, with an emphasis on historically underserved communities, while reconnecting the surrounding neighborhoods for residents and visitors to live, work, and play freely and safely throughout the area.



The Study will build upon past work by conducting a review, consolidation, and synthesis of all prior studies including planning documents such as the <u>Hagerstown Bicycle and Pedestrian</u> Priority Area Plan, the <u>Hagerstown Dual Highway Speed Management Study</u>, and the <u>US 40 Dual</u> <u>Highway Pedestrian Safety Study and Audit</u>. The PEL Study will evaluate opportunities to improve the entire length of the study area, from the edge of Hagerstown's urban core to I-70, rather than prior efforts that evaluated only limited segments of the study area for access and safety. The study will include the development of a Purpose and Need statement; robust public outreach and community involvement; traffic and crash analyses for roadway operations; a range of geometric improvements along the mainline and at the intersections; roadway and pedestrian-level lighting analysis; prospective transit service enhancements; and identification of environmental conditions to expedite the National Environmental Policy Act (NEPA) process. Along with the assessment of existing physical conditions, the PEL Study will evaluate a range of short- and long-term solutions to support access, transit, and greenspace recommendations to bridge the divide created by the Dual Highway, while investing in opportunities to reduce the corridor's carbon footprint, preserve the natural environment, and celebrate local history and culture.

The PEL Study will inform decision-making for both immediate and long-term infrastructure investments that will prioritize connecting the community to nearby essential destinations, such as health care providers, schools, and sustenance, while increasing access to affordable and sustainable transportation options and reducing barriers to community connectivity.

#### B. Location and Map

US 40 is the successor to the historic route of the <u>National Road</u>, the first federal interstate road built in the 1910s that ran from the City of Baltimore, west through Ohio, Indiana, and Illinois to Vandalia, then to the Illinois Territory near the Mississippi River. US 40 was designated as an



Figure 2: Study Area (39.605483, -77.685971, Southern Terminus)

improvement to the original state road to connect central Maryland to Hagerstown, Maryland and the greater Baltimore and Washington regions.

This section of US 40 was expanded from two lanes to four lanes in 1966 and named the Dual Highway. The proposed study area along this statemaintained, median-divided, principal arterial begins at the intersection of Cannon Avenue in downtown Hagerstown and curves southeast, crossing Antietam Creek to All Star Court. The major crossroads that form intersections with Dual Highway include N. Cleveland Avenue, Eastern Boulevard, Mount Aetna Road, and Edgewood Drive as it passes through residential and commercial areas that



are also contiguous to three Historically Disadvantaged census tracts and one Area of Persistent Poverty tract. At the southeastern edge of Hagerstown, the study limits approach the cloverleaf interchange with I-70, built in the late 1950s.

Three fixed bus routes operated by Washington County are available in the study area. The <u>Robinwood, Funkstown, and Long Meadow Eastern</u> lines serve the Dual Highway or are near it. These combined routes experienced ridership levels above 75,000 in Fiscal Year23.

<u>Land use within the study area</u> transitions from commercial general and medium-density residential, with minor parks, recreation, and open space at the northern end to nearby institutional, higher density, and mixed-use areas at the southern end. Nearby surrounding communities include five apartment complexes and five long-term residential hotels that provide housing to significant transient populations.

Along Dual Highway, there are additional highly relevant community resources, such as three schools, a medical center, two places of worship, four grocery stores, numerous restaurants, and convenience stores, as well as four pharmacies/express health care facilities including <u>Meritus</u> <u>Health</u>. The corridor also provides access to local, culturally significant destinations:

- Hagerstown Multi-Use Sports and Events Facility;
- <u>Hagerstown Flying Boxcars</u> professional minor league baseball team;
- Fairgrounds Park with sports fields and recreational facilities; and
- <u>Hagerstown Cultural Trail.</u>

#### C. Merit Criteria

#### 1. Equity and Environmental Justice

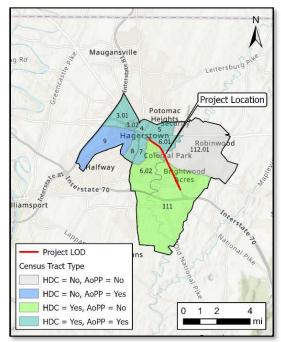
Hagerstown is just south of the Mason Dixon line and was a segregated city with its black population red-lined and confined residentially to the Jonathan Street corridor, slightly north of Dual Highway in downtown Hagerstown. Although the City's population is majority white, reminders of the legacy of social injustice are still evident. For example, most of the City's prominent African-American historic sites have been neglected over time. Additionally, the City's poverty concentrations remain disproportionately burdensome for minority residents in contrast to whites, experiencing proportionally higher poverty rates. For example, within the contiguous census tracts, although blacks represent only 10% of the population with 72% of those living below poverty are black, while whites compose nearly 80% of the population with 72% of those living in poverty are white, the distribution of poverty for blacks is comparatively higher than their distribution in the population while white poverty distribution is comparatively lower than their representation in the overall population. As the City and Washington County progress into the next half of the century, SHA seeks to work closely with localities to ensure equitable investments are made throughout the State's transportation systems.

The demographic composition of the study area varies from downtown Hagerstown at the northern terminus of the study area (Census tracts 3.01, 3.02, 4, 5, 7, 8, 9) to the southern terminus (Census tracts 6.01, 6.02, 111, 112.01) approaching the interchange with I-70. For example, the poverty rate



transitions from 32% in downtown to 10% in the census tracts adjacent to the study area. Additionally, heading east from downtown, the demographic analysis shows an increase in employment, education attainment levels, and average mean, median, and per capita income.

For example, according to the American Community Survey (ACS) 2021 5-year estimates, average per capita income is \$13,000 higher for tracts outside the urban core, the percent of households without vehicles is 20% lower, and the number of households reliant on the Supplemental Nutrition Assistance Program is 27% lower. Based on these findings, social and economic disparities exist between the downtown core and the study area/surrounding communities. SHA will seek to further understand these disparities through the PEL Study and develop options to improve the connectivity between downtown and the study area.



#### 2. Access

The PEL Study will identify improvements to address safety and accessibility along the Dual Highway corridor in Hagerstown and the neighboring communities. Per the vision of Governor Wes Moore's Administration, MDOT is committed to Vision Zero policies and improving safety for all vulnerable roadway users. These efforts include joining the U.S. Department of Transportation as an Ally in Action for the <u>National Roadway Safety Strategy (NRSS</u>). The study area has one of the highest pedestrian and vehicular crash rates in the State, making it one of Maryland's Priority Corridors to improve pedestrian safety and reduce crashes (as identified through <u>SHA's recent Pedestrian Safety Action Plan</u>). The study area is also listed as a Candidate Safety Improvement Location (CSIL) in Maryland due to the high number of reported crashes and a high crash severity index relative to similar corridors throughout the State. By focusing on this corridor, SHA will be able to implement solutions per their 2019 <u>Context Driven Guide</u> and Toolkit for Traditional Town Centers and Suburban Activity Centers.

There are numerous access concerns within the corridor due to sidewalk gaps, insufficient lighting, complex intersection geometry, long crossings, and few crosswalks. Crash analysis on this corridor has determined that streets with higher numbers of travel lanes, travel speeds, and vehicle volumes are associated with higher numbers of crashes and higher rates of pedestrian and bicyclist fatalities, including serious injuries. The PEL Study will develop recommendations for the following:

- Options to increase mobility, connectivity, and safety to access essential destinations;
- New or improved context-sensitive solutions;
- Safe accommodation for all types of users, including underserved and underrepresented;
- Integration of the corridor into surrounding context and community character; and
- Encouraging thriving communities for individuals to live/work/play with or without a car.



As the corridor progresses from the denser downtown area at the north end toward a less dense commercial area at the south end, sidewalks become scarce, blocks become longer, and opportunities to cross Dual Highway are fewer. Also, the study area has many multi-use facilities. In the northern section, there are several restaurants, pharmacies, grocery stores, gas stations, and book shops. In the central section, there are hotels, apartment buildings, schools, banks, restaurants, coffee shops, grocery stores, small businesses, car dealerships, places of worship, health care facilities, and thrift shops. Lastly, in the southern portion, facilities include hotels, car dealerships, childcare centers, and small businesses.

Bus service is available in the study area with riders accessing the bus stops along discontinuous sections of sidewalk. Bus service expansion in Washington County and along Dual Highway will be explored as part of the upcoming Transit Development Plan (TDP) being completed by Washington County and the Maryland Transit Administration. With the potential for expanded transit services to start in 2026, it would be beneficial for additional active transportation infrastructure to be in place as expanded transit would result in more bus riders. This additional transit service would also increase bicyclist and pedestrian crossings or travels along Dual Highway due to the bus stops and many essential destinations that lie between these intersections.

The PEL Study, along with input from the communities and stakeholders, will produce solutions to increase access and improve safety. SHA will investigate some of the following elements:

- 1. Long stretches of roadway without marked crosswalks, including:
  - a. 1.17 miles between Eastern Boulevard South and North Edgewood Drive;
  - b. 4,330 feet between North Edgewood Drive and All Star Court; and
  - c. 1,930 feet between South Cleveland Avenue and Tracys Lane.
- 2. The four right-turn lanes at the intersection of S Cleveland Avenue this causes pedestrians and bicyclists to have to cross an additional travel lane.
- 3. The recently upgraded marked crosswalk at Tracys Lane that provides a continuous pedestrian crossing through the landscaped median evaluate if the design could provide greater protection for those on foot and enhanced ADA compliance on all legs of the intersection.
- 4. Improvements at Cannon Avenue, South Cleveland Avenue, and Eastern Boulevard consider pedestrian refuge islands, leading pedestrian intervals, pedestrian hybrid beacons, increased pedestrian signal timing, and slower vehicle-turning speeds.
- 5. Use of pedestrian hybrid beacons at many crosswalks, designed to reduce pedestrian crashes.
- 6. Pedestrian and roadway lighting.

Although SHA has construction plans to extend the sidewalks along Dual Highway from Eastern Boulevard to All Star Court, it will not provide full continuous sidewalks nor address the access barriers along the entire length of the study area, similar to prior studies. The PEL Study will help to influence how this sidewalk extension is constructed. Additionally, evaluating this entire corridor will inform local and state leaders how to restore parity to this corridor by integrating the road with adjacent destinations, increasing access to affordable and sustainable transportation options, and improving the opportunity to cross and walk along segments of Dual Highway to residential and commercial destinations.



#### 3. Facility Suitability

Dual Highway is classified as a minor arterial in the study area and, in 2022, carried an average daily traffic (ADT) of 24,550 vehicles per day near Cannon Avenue and 32,650 vehicles per day near All Star Court. The posted speed limit is 25 mph between Cannon Avenue and Cleveland Avenue, 35 mph between Cleveland Avenue and Eastern Boulevard, and 45 mph between Eastern Boulevard and All Star Court approaching I-70.

During the five-year crash history (from 2018 through 2022), 388 crashes occurred in the study area. **Six of these crashes involved a fatality**, resulting in an exposure rate that is nearly 4 times higher than the statewide average. Similarly, the crash rates for injury crashes (154 crashes) and property damage crashes (228 crashes) exceeded the statewide average by more than 50% and nearly 30%, respectively. In summary, the 2.9-mile section between Cannon Avenue and All Star Court has exhibited a five-year crash history that significantly exceeds the statewide average for similar facilities.

Crashes involving people who walk or bicycle represent a particular concern for this corridor. A total of 16 bicycle and pedestrian crashes occurred during the past five years—an exposure rate that is over 2.6 times the statewide average. Two of these pedestrian crashes resulted in death and twelve resulted in injury. One of the fatal crashes occurred at an unmarked, mid-block crossing near the directional median cross-over located northwest of Eastern Boulevard. The second pedestrian fatality occurred at an unmarked, mid-block crossing located south of Cleveland Avenue. Both fatal crashes occurred at night at locations with street lighting. Among the crashes resulting in injuries, five occurred at intersections: three at North Cannon Avenue, one at Tracys Lane, and one at Edgewood Drive. Four of these crashes occurred during dark conditions without street lighting.

As described, the design of Dual Highway results in crashes that are typical on high-volume, highspeed roadways in populated areas. These burdens often disproportionately affect vulnerable people, a characteristic that is true in the case of this section of Dual Highway. With high numbers of residents who are unable to drive due to age, disability, or vehicle ownership, **the roadway as designed is poorly suited to the community.** Additionally, SHA's future travel demand model predicts an increase in vehicle volumes that would warrant the widening of the roadway; however, widening would not be feasible given the corridor's constraints, and would be counter-productive to the goal of accommodating more multi-modal users and improving connectivity between the residential and commercial areas.





The study area along Dual Highway will be evaluated for context-sensitive solutions to restore access to the essential community destinations along and adjacent to the study area. High vehicle volumes on the roadway create an environmental burden on the community, as confirmed by observation, records and geospatial analysis, because they produce poor air quality, elevated ambient air temperatures, high greenhouse gas (GHG) emissions, and the potential for flooding.

The PEL Study will evaluate and propose solutions to alleviate the environmental burdens on the people who live, work, and travel along Dual Highway. These solutions would likely include more street trees, green infrastructure, and improved pedestrian/bicyclist accommodations. Implementing these types of solutions would address current and projected vulnerabilities that, if left unimproved, could threaten public health, accessibility and mobility of people, economic growth, goods movement, and transportation network efficiency.

## 4. Community Engagement and Community-based Stewardship, Management, and Partnerships

SHA recognizes that a successful PEL Study requires robust community engagement to understand the communities' needs and concerns, particularly underserved and underrepresented residents, in order to determine appropriate project improvements. A Community Participation Plan, compliant with <u>DOT Order 1000.12C</u>, will be developed and implemented to ensure meaningful outreach and information gathering are accessible for all users and available to all adjacent land uses – SHA intends to meet the community where they live, work and play, including the low-income, limited English proficient (LEP), and hard-to-reach populations, including those in multi-family dwelling units. This information will inform the design, construction, and operations of the corridor.

SHA will develop improvements through the PEL Study that build upon the work completed in previous studies (see appendix for previous studies). They will be targeted, measurable, and focused on the issues, opportunities, and milestones that are of highest relevance to the community and its stakeholders. The outreach approach will be based on the proven four-step process from the Public Relations Society of America: Research, Planning, Execution, and Evaluation.

To begin, SHA will develop clear and effective messages, which will be delivered through a variety of communication tactics to ensure those messages are understood. SHA will work to:

- Establish overarching goals and measurable objectives;
- Identify the stakeholders;
- Develop key messages;
- Establish a schedule and format for regular communications with the public and stakeholders;
- Set desired outcomes; and
- Identify tactics for achieving the desired outcomes.

From online outreach via web content and social media to grassroots efforts like canvassing and community meetings, SHA will employ tried-and-true tactics. SHA will also establish a forum for meaningful two-way communication with the community and various stakeholder groups, who will be integral to the success of this PEL Study.



During the stakeholder identification phase, SHA will identify representatives from community groups and community leaders to establish a Community Advisory Committee (CAC). This committee will not only provide feedback to SHA, but they will be a conduit to providing information to their communities. Many community groups are more receptive when information comes from a leader in their community. Meetings with the CAC will occur at a regular cadence to build trust and ensure information is shared in a timely manner.



The team will also establish an electronic presence for the study. A website will be established and include all documents from previous, relevant studies, as well as current study information. The website will be a clearinghouse for information and provide a mechanism for community members and stakeholders to provide feedback to the study team. The team will work with the CAC to ensure that LEP needs are met, and the site will be designed for automatic translation into Spanish and other languages, if needed.

As the PEL Study progresses, at least three in-person public meetings will be planned, such as open houses and town halls. These meetings will provide community members with an overview of the Study and allow them to solicit feedback, which will be incorporated into the study process. The outreach team will work with the CAC to develop the best meeting format for the communities' needs, taking into consideration the identified 4% LEP needs demonstrated by the ACS. All relevant outreach materials will be translated accordingly.

Participation is key to these meetings, so aside from the traditional tactics of informing the community, such as newspaper ads, social media posts, digital/geofenced advertising, postcard mailers, and community boards, SHA will deploy an outreach team to canvas key locations to reach impacted audiences, including transit riders. In addition to providing meeting notifications, SHA will distribute information about the study and directly engage with people to encourage them to participate. A list of proposed locations and entities considered for outreach is shown below.

Lastly, several letters of support were provided for this Study and are included as attachments to this application, including letters from the City of Hagerstown, Delegate Brooke Grossman (2B),

Delegate William Valentine (2A), Governor Wes Greater Moore. Hagerstown Committee. Hagerstown/Eastern Panhandle Metropolitan Planning Organization (Transportation Improvement Plan confirmation), Meritus Health, Senator Paul Corderman (2), Sheetz, Tri-County Council of Western Maryland, and Washington County Chamber of Commerce. The numerous entities are supportive of the Study and understand the importance of reconnecting the communities along Dual Highway.

#### **Proposed Outreach Locations**

- Washington County Department of Human Services
- Eastern Elementary School
- Washington County Library
- The Bradford on Manor Drive Apartment Complex
- Covenant Life Church and Hagerstown Church of Nazarene
- Pedestrian magnets such as Sheetz, Aldi Food Market, Lidl Food Market



#### 5. Equitable Development

"<u>A Better Maryland</u>," is Maryland's State Development Plan that guides collaborative strategies essential for modern planning, including state and local plans and resources that are used to plan, coordinate responsible growth, and implement resource protection throughout Maryland. As SHA incorporates equality into the state, it looks to various strategies outlined in "A Better Maryland" to ensure a safe, secure, and resilient transportation system and provide state infrastructure assistance programs for economic development projects at different scales, while promoting development opportunities that leverage transportation investments. This grant application is most closely aligned with two listed strategies, including 1) working in partnership with local jurisdictions and other state agencies to encourage efficient use of infrastructure through corridor planning and 2) supporting revitalization strategies to strengthen existing communities and infrastructure.

Additionally, a park equity analysis was performed throughout the City and included in <u>visionHagerstown 2035</u> <u>Comprehensive Plan</u>. As demonstrated in Map 9-4 of the planning document, several areas along Dual Highway were identified as ranging from low to high need for equitable park access. The PEL will incorporate these findings into future efforts in improving access to nature and recreation along the corridor.



West of Dual Highway, multiple new developments are either currently planned, being constructed, or under consideration, including commercial warehouses, flex buildings, convenience stores, and fast food and family restaurants. Other new developments include various residential housing, such as single-family housing, townhomes and apartments, mixed-use high-density residences, and planned unit developments (PUD). All of these planned developments demonstrate a healthy diversity of planning investments that will continue to build up and reconnect the communities of Hagerstown and Washington County.

#### 6. Climate and Environment

The transportation sector, specifically passenger cars and light-duty trucks, followed by heavy-duty trucks, account for one of the largest sources of GHG emissions in the State. SHA approaches adapting to and combating climate change by committing to multi-modal accessibility and mobility for all transportation system users and by helping to mitigate congestion and shift travel to less emission-intensive modes. MDOT has been working to integrate various planning, management, and implementation efforts that are critical from a climate change perspective. The purpose of this PEL Study is to identify transportation improvements that will enhance community connections between downtown Hagerstown and the study area so high-quality choices for active, lower-carbon travel will be evaluated for future implementation. For SHA to improve access to daily needs for the communities surrounding Dual Highway, the evaluation of adequate approaches and locations for transportation methods like walking, cycling, and public transit is necessary.

In alignment with the Maryland Climate Solutions Now Act (CSNA), the Maryland Department of Environment's 2023 <u>Maryland's Climate Pathway Report</u> (Maryland's Climate Action Plan) plans to reduce statewide GHG emissions by 60% by 2031. This action plan identifies currently



implemented policies as well as policies to be considered for implementation. Relevant to this PEL Study and as defined in Maryland's Climate Action Plan, MDOT's existing strategies include transitioning into cleaner, more efficient public transportation, expanding public transit systems and intercity systems, investing in bike and pedestrian infrastructure, and achieving comprehensive Smart Growth goals to help reach reduced GHG emissions.

The evaluation of planning and environmental linkages for equitable and lower-carbon travel like walking, cycling, and public transportation is necessary because these transportation methods do not rely on cars and light-duty trucks. With less of the population relying on automobiles for transportation to and from jobs, education, health care facilities, restaurants, nature and recreation, transportation-related air pollution and GHG emissions can be minimized.

Of local importance, <u>visionHagerstown 2035</u> is Hagerstown's most recent Comprehensive Plan. The <u>Environmental Resources and Sustainability</u> chapter of the City's Comprehensive Plan highlights local climate action plans and identifies additional strategies related to reducing GHG emissions and increasing lower-carbon travel. To date, the City has actively promoted the reduction of GHGs by encouraging alternative transportation. The City has also earned a coveted "Bicycle Friendly Community" distinction at the bronze level for the League of American Bicyclists (LAB). As Hagerstown intends to continue to implement policies that reduce GHG emissions, this PEL Study is important to understand prioritized areas for improvements and directly support the City's Climate Action Plan, encouraging SHA and the City to work together to make informed decisions on how to best implement GHG reduction transportation methods.

#### 7. Workforce Development and Economic Opportunity

To support workforce development, SHA's On-the-Job Training program helps contractors develop full journeyperson status for minorities, females, and the disadvantaged and disabled individuals in the highway construction industry. It helps individuals gain skills in crafts and helps employers maintain or exceed the proposed workforce representation goals in their contracts, thus meeting the primary objective of equal employment opportunity. This effort aids the contractor's affirmative action initiatives as described in their contracts and promotes equal opportunity in the highway construction industry. SHA requires full utilization of all training and skill-improvement opportunities to assure the increased participation of minority groups, the disadvantaged, and women in all phases of the highway construction industry.

Additionally, in 1978, Maryland's General Assembly enacted legislation creating the Minority Business Enterprise (MBE) Program to ensure that socially and economically disadvantaged small business owners are included in the State's procurement and contracting opportunities. SHA adheres to the MBE regulations and Code of Federal Regulations (CFR) by making every effort to award an overall minimum goal of 29% of the state-funded procurements and 26.39% of the federally funded procurement contracts directly (prime contractors) or indirectly (subcontractors) to MDOT-certified MBE and Disadvantaged Business Enterprise (DBE) firms.

SHA is committed to the intent and philosophy of the DBE and MBE Programs (D/MBE) and will utilize consultant contracts with these D/MBE goals to complete the PEL Study. SHA will monitor the participation and representation of the selected contract to ensure the prime consultant is using the D/MBE subconsultants in a meaningful manner and that they comply with the requirements of the program as addressed in the CFR 49 26.37 (b) (c) and in accordance with the MDOT D/MBE program guidelines.