MEMORANDUM OF UNDERSTANDING
AMONG
THE TOLEDO METROPOLITAN AREA COUNCIL OF GOVERNMENTS,
THE OHIO ENVIRONMENTAL PROTECTION AGENCY,
THE OHIO DEPARTMENT OF TRANSPORTATION,
THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY-REGION 5,
THE FEDERAL HIGHWAY ADMINISTRATION-OHIO DIVISION, AND
THE FEDERAL TRANSIT ADMINISTRATION-REGION 5

The purpose of this Memorandum of Understanding (MOU) is to implement Section 176 of the Clean Air Act (CAA), as amended (42 U.S.C. 7401 et seq.), the related requirements of 23 U.S. C. 109(j), and regulations under the Code of Federal Regulations (CFR) Section 40, Part 93, Subpart A with respect to the conformity of transportation plans, programs, and projects that are developed, funded or approved by the United States Department of Transportation (U.S. DOT) and by Metropolitan Planning Organizations (MPOs), and the Ohio Department of Transportation (Ohio DOT), or other recipients of funds under title 23 U.S.C. or the Federal Transit Laws (49 U.S.C. Chapter 53). This MOU sets forth policy, criteria, and procedures for demonstrating and assuring conformity of such activities to applicable implementation plans developed according to Part A, Section 110 and Part D of the CAA.

This is a MOU concerning the criteria and procedures for the conformity determination of transportation plans, programs and projects in the Toledo, Ohio Metropolitan Statistical areas for National Ambient Air Quality Standards (NAAQS), pursuant to the CAA Amendments of 1990.

The six parties to this MOU are as follows, hereafter referred to as "all parties":

Federal Highway Administration-Ohio Division (FHWA-OH)
Federal Transit Administration-Region 5 (FTA-R5)
Ohio Department of Transportation (Ohio DOT)
Ohio Environmental Protection Agency (Ohio EPA)
Toledo Metropolitan Area Council of Governments (TMACOG)
United States Environmental Protection Agency-Region 5 (U.S. EPA-R5)

This MOU will be submitted as a revision to the Ohio State Implementation Plan (SIP) required by Section 176 of the CAA Amendments of 1990 and will govern conformity determinations in the TMACOG area. TMACOG is the MPO for Lucas and Wood counties.

This MOU will continue to apply to any revised nonattainment area geographies resulting from future designations, or designation revisions for the criteria pollutants within the TMACOG area.

Execution of this MOU by each party shall be by signature of each party's representative.

The provisions of this MOU shall be implemented through appropriate procedures, resolutions, or other means, in order to comply with the requirements of all federal and state laws and regulations relating to the conformity determination and development of applicable implementation plan revisions. The roles, processes and responsibilities of each signatory to this MOU are defined and delineated in the MOU and Attachments A and B.

Attachment A

Transportation Air Quality Conformity Protocol

Conformity Procedures

In accordance with the requirements under Section 176 (c)(4)(C) of the CAA, Ohio EPA submitted a state implementation plan (SIP) revision to U.S. EPA on August 17, 1995. This submittal was found to be complete on October 5, 1995. In this submittal, Ohio EPA adopted State rules to meet the requirements of 40 CFR Part 51, Subpart T, as published on November 24, 1993. Transportation conformity is required for all nonattainment or maintenance areas for any transportation related criteria pollutants [40 CFR 51.394 (b)].

On August 10, 2005, the President signed into law the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU). SAFETEA-LU promotes more efficient and effective Federal surface transportation programs by focusing on transportation issues of national significance, while giving State and local transportation decision makers more flexibility for solving transportation problems in their communities. Section 6011 of SAFETEA-LU specifically addresses transportation conformity. One of the requirements, (f)(4)(E) states,

> "Not later than 2 years after the date of enactment of the SAFETEA-LU the procedures under subparagraph (A) shall include a requirement that each state include in the state implementation plan criteria and procedures for consultation required by subparagraph (D) (i), and enforcement and enforceability (pursuant to sections 93.125 (c) and 93.122 (a) (4) (ii) of Title 40, Code of Federal Regulations (CFR) in accordance with the Administrator's criteria and procedures for consultation, enforcement and enforceability."

States are no longer required to adopt all of the provisions of the federal conformity rule. The three required SIP elements are:

1) consultation procedures [40 CFR 93.105];
2) procedures for determining regional transportation-related emissions [40 CFR 93.122(a)(4)(ii)]; and
3) enforceability of design concept and scope and project-level mitigation and control measures [40 CFR 93.125 (c)].

In accordance with 40 CFR Section 93.105, the SIP or SIP revision shall include procedures for interagency consultation (federal, state and local), resolution of conflicts, and public consultation as described in Attachment B. Public consultation shall be developed in accordance with the requirements for public participation in 23 CFR Part 450. The plan shall include procedures to be undertaken by TMACOG, state and federal DOTs, local air quality agencies and U.S. EPA, prior to making conformity determinations, and by state and local air agencies and U.S. EPA with TMACOG, state and federal DOTs, in developing applicable implementation plans. TMACOG and Ohio DOT must provide reasonable opportunity for consultation with Ohio EPA, U.S. EPA and local air quality and transportation agencies as described in Attachment B.

In accordance with 40 CFR section 93.122 (a)(4)(ii), prior to making a conformity determination on the regional transportation plans (RTPs) or transportation improvement programs (TIPs), TMACOG will not include emissions reduction credits from any control measures that are not included in their RTPs or TIPs and that do not require a regulatory action in the regional emissions analyses used in the conformity analyses unless TMACOG or FHWA/FTA obtains

written commitments, as defined in 40 CFR section 93.101, from the appropriate entities to implement those control measures. The written commitments to implement those control measures must be fulfilled by the appropriate entities. Prior to making a conformity determination on a RTP or TIP, TMACOG will ensure the project design concept and scope are appropriately identified in the emissions analyses used in the regional conformity analyses.

In accordance with 40 CFR section 93.125(c), prior to making a project-level conformity determination for a transportation project, FHWA/FTA must obtain from the project sponsor and/or operator written commitments, as defined in 40 CFR section 93.101, to implement any project-level mitigation or control measures in the construction or operation of the project identified as conditions for National Environmental Policy Act (NEPA) approval. The written commitments to implement those project-level mitigation or control measures must be fulfilled by the appropriate entities.

Attachment B

Interagency Consultation Procedures

I. General

Ohio EPA shall provide well-defined consultation procedures in the SIP whereby all parties to this MOU and other organizations with responsibilities for developing, submitting, or implementing provisions of a SIP must consult with each other on the development of the SIP, the RTPs, the TIPs, and associated conformity determinations in accordance with 40 CFR 93.105(b)(1).

These procedures implement the interagency consultation process for TMACOG and include procedures to be undertaken by all parties to this MOU before making transportation conformity determinations on the RTPs and TIPs in accordance with 40 CFR 93.105(a)(1) and 40 CFR 93.105(c)(3). This area's geographic coverage includes one MPO, TMACOG. TMACOG and Ohio DOT perform conformity analysis for the TMACOG area. This analysis is used to make a conformity determination for the area.

II. Consultation on Transportation Plans, Transportation Plan Amendments, Transportation Improvement Programs, and Transportation Improvement Program Amendments [40 CFR 93.105]

Consultation on all non-conformity related aspects of transportation plans, transportation improvement programs, and amendments thereto shall be governed by the applicable participation plans developed pursuant to 23 USC 134/49 USC 5303(i)(5), (i)(6), and (j)(4) and 23 USC 135/49 USC 5304 (f)(3) and (g)(3). Consultation on conformity related aspects of these activities are delineated below.

a) Consultation on Transportation Plan and Transportation Plan Amendment Conformity Process

Following TMACOG's notice that the transportation plan's air quality conformity process has been initiated, interagency consultation will define the procedures and parameters by which conformity will be established. TMACOG and Ohio DOT will coordinate the interagency consultation process. In accordance with 40 CFR 93.105 (c), interagency consultation will include the following topics, as appropriate:

- travel forecasting and modeling assumptions;
- latest planning assumptions;
- motor vehicle emission factors to be used in conformity analysis;
- appropriate analysis years;
- treatment of regionally significant projects (federal and non-federal funded) assumed in the transportation network and the year of operation;
- treatment of regionally significant projects that span MPO boundaries;
- status of TCM implementation;
- financial constraints and other requirements that affect conformity pursuant to Federal Statewide and Metropolitan Planning regulations;
- reliance on a previous regional emissions analysis;
- conformity process public participation procedures; and
- the need for interim RTPs (in the event of a conformity lapse).

TMACOG is the lead agency for development of its transportation plans and amendments thereto. TMACOG is lead agency for the conformity analyses for Lucas and Woo Counties. The interagency consultation parties will participate in the plan development process, review associated documentation, and collaboratively establish the procedures and parameters for determining transportation plan conformity.

If new designations for criteria pollutants occur that expand analyses areas beyond those defined above, interagency consultation will determine the parties responsible for conducting those analyses in accordance with 40 CFR 93.105(c)(2)(ii).

Following TMACOG's approval of their final transportation plan and conformity finding, Ohio DOT will provide the final transportation plans and conformity documentation to FHWA/FTA for joint review as required by 40 CFR 93.105 (c)(7) and 23 CFR 450.322 of the FHWA/FTA Statewide and Metropolitan Planning rule. Copies of the final transportation plans and conformity documentation also will be made available on the TMACOG Web site.

b) <u>Consultation and Notification Procedures for Conformity Analysis of TIP and TIP Amendments</u>

Following TMACOG's notice that the TIP air quality conformity process has been initiated, interagency consultation will define the procedures and parameters by which conformity will be established. TMACOG and Ohio DOT will coordinate the TIP transportation conformity interagency consultation process. Interagency consultation will include the same topics listed for the transportation plan (see Section II. a) as well as the additional topics listed below in accordance with 40 CFR 93.105 (c).

- identification of exempt TIP projects;
- identification of exempt projects which should be treated as nonexempt; and
- determination of an interim TIP (in the event of a conformity lapse) inclusive of projects that can advance during a conformity lapse.

For TIP amendments, TMACOG and Ohio DOT will consult as identified below:

Consultation required in situations requiring a conformity determination, including but not limited to:

- add a regionally significant project to the TIP when it has already been appropriately accounted for in the regional emissions analysis for the transportation plan;
- add a non-regionally significant project to the TIP;
- add non-exempt, regionally significant project that has not been accounted for in the regional emissions analysis; and
- change in non-exempt, regionally significant project that is not consistent with the design concept and scope or the conformity analyses years.

After TMACOG approves its final TIP and conformity finding, TMACOG will provide the final TIP and conformity documentation to Ohio DOT. Ohio DOT will forward the documents to FHWA/FTA for joint review as required by 40 CFR 93.105 (c)(7) and 23 CFR 450.322 of the FHWA/FTA Statewide and Metropolitan Planning rule.

Copies of the final TIPs and conformity documentation will be made available on TMACOG's Web site.

III. Transportation Plan and Transportation Improvement Program Interagency Consultation Agency Roles and Responsibilities [40 CFR 93.105(b)(2)]

Ohio EPA

- Reviews and comments on all aspects of the conformity determinations for the RTP and TIP in a timely manner.
- Develops, solicits input on and adopts motor vehicle emission budgets.
- Seeks U.S. EPA approval for the use of motor vehicle emissions factors and mobile source budgets in conformity analyses.
- Reviews and comments on the transportation plan and TIP development documentation and associated air quality analyses in a timely manner.

Ohio DOT

- Participates as a voting member of the TMACOG MPO governing body and associated committees as defined by their respective codes of regulations and/or agency bylaws.
- Project initiator for state sponsored transportation improvement projects in the TMACOG region.
- Works directly with TMACOG in providing and reviewing detailed project programming information.
- Defines the design concept and scope of state sponsored transportation improvement projects to conduct regional emissions analysis.
- Promptly notifies TMACOG of changes in design concept and scope, cost, and implementation year of regionally significant state sponsored projects.
- Assures project level CO and PM hotspot analyses are included in TMACOG region transportation project NEPA documentation.
- Identifies and commits to project level CO and PM mitigation measures for state sponsored transportation projects, as required;.
- Implements TCMs for which Ohio DOT is responsible in a timely fashion.
- Works with local municipalities and other project sponsors to ensure that the above procedures are also implemented on locally sponsored highway projects.
- Assists TMACOG with travel demand modeling and mobile source emissions estimating processes.

TMACOG

- Develop, coordinate, and circulate transportation plan and TIP supporting and technical documentation for interagency consultation and public participation.
- Conduct transportation plan/TIP and air quality conformity public participation processes.
- Maintain demographic and land use data for travel demand forecasting and regional emissions analysis.
- Work with Ohio DOT and local sponsors to define the design concept and scope of projects in the transportation plan and TIP to conduct regional emissions analyses.
- Prepare transportation plan/TIP conformity documentation.
- Include funding for SIP mandated TCMs in the transportation plan and TIP.
- Adopt transportation plan/TIP and make conformity determinations.

U.S. EPA

- Administers and provides guidance on the Clean Air Act and Transportation Conformity regulations.
- Determines adequacy of motor vehicle emissions budget used for making conformity determinations.
- Reviews and comments on transportation plan and transportation improvement program documentation in keeping with participation plan requirements.
- Reviews and comments on conformity determinations for the transportation plans and transportation improvement programs.

FHWA/FTA

- Consult with U.S. EPA on conformity determinations.
- Provide guidance on transportation planning regulations.
- Ensure that all transportation planning and transportation conformity requirements contained in 23 CFR Part 450 and 40 CFR Part 93, respectively, are met.
- Work with transit agencies to ensure that conformity procedures are implemented in transit agency-sponsored projects.
- Make transportation plan/TIP conformity determinations

IV. State Implementation Plan (SIP) Consultation Process [40 CFR 93.105]

a) SIP Consultation Structure and Process

Ohio EPA is responsible for preparing the SIP. If new transportation control strategies or TCMs are considered necessary to achieve and/or maintain federal air quality standards, the interagency consultation group will discuss possible TCMs for inclusion in the SIP. Ohio EPA will provide and update schedules for SIP development that will be available to all agencies and the public. Public involvement will be in accordance with Ohio EPA's public involvement procedures. Key documents will be posted on Ohio EPA's Web site. SIP development will normally cover inventory development, determination of emission reductions necessary to achieve and/or maintain federal air quality standards, transportation and other control strategies that may be necessary to achieve these standards, contingency measures, and other such technical documentation as required. Pursuant to 40 CFR 93.105 (b)(2)(vi) the SIP will include a process to develop and evaluate transportation control measures as may be suggested by TMACOG, Ohio DOT and other agencies and the public.

TMACOG and Ohio DOT develop the travel activity and emissions data that are used by Ohio EPA in establishing the on-road motor vehicle emission inventories for the SIP with consultation from Ohio EPA on the inputs for Mobile modeling.

If new transportation control strategies are considered that may aid the region to achieve and/or maintain federal air quality standards, Ohio EPA will provide TMACOG and Ohio DOT with guidance for estimating their impacts on regional emissions. Ohio EPA will utilize the results of these analyses to evaluate the measures and receive public comment on potential new measures through the SIP consultation process. This SIP process will define the motor vehicle emissions budget (MVEB), and its various components, that will be used for future conformity determinations of the RTP and TIP. Prior to publishing the draft SIP, TMACOG and Ohio DOT will have an opportunity to review and comment on the proposed MVEB.

In accordance with 40 CFR 93.105 (b)(2)(iii) and 40 CFR 93.105 (c)(7) Ohio EPA will circulate the draft SIP for public review, and all comments will be responded to in writing prior to adoption of the SIP. The draft will be amended as needed in response to comments received. Ohio EPA will then transmit the final document with amendments, along with the public notice, public hearing transcript and a summary of comments and responses, to U.S. EPA.

b) <u>Agency Roles and Responsibilities</u> [40 CFR 93.105(b)(2)(i)]

The following provides a summary on the roles and responsibilities of the different agencies with involvement in development and review of SIP submittals dealing with TCMs or emissions budgets.

Ohio EPA

- Responsible for air quality monitoring, preparation and maintenance of detailed and comprehensive emissions inventories, air quality modeling, and other air quality planning and control responsibilities.
- Responsible for preparing drafts of SIP submittals, revising those drafts, incorporating other agencies' comments, attending and scheduling public hearings, preparing public hearing transcripts and responding to public comments.
- Responsible for timely SIP submittal to U.S. EPA.

Ohio DOT

- Assists in developing regional travel demand forecasts used in the SIP mobile emissions inventories and analyses of new TCMs.
- Assists in developing mobile source inventories and analyses as needed.
- Participates in reviewing and commenting on draft SIP documents.

TMACOG

- Responsible for developing regional travel demand forecasts used in the SIP emissions inventories and analyses of new TCMs.
- Monitor and report on implementation of federal TCMs.
- Responsible for providing review and comments on draft SIP documents.

U.S. EPA

- Receives the Ohio EPA SIP submittals and has the responsibility to act on them in a timely manner.
- Directly influences the content of the submittals through regulations implementing the federal Clean Air Act and has the opportunity to influence the submittals through various meetings, workshops and hearing that are conducted.
- Provides guidance on the Clean Air Act.
- Determines adequacy of motor vehicle emissions budget used for making conformity determinations.
- Provides concurrence with TCM substitution in the SIP.

FHWA/FTA

- Provides guidance on transportation planning regulation.
- Participates in the SIP review and comment process.

Please note: while these are key areas and agencies involved in the development of the SIP, participation in the SIP process by other agencies may occur.

V. Project Level Conformity Determinations for Carbon Monoxide (CO) and/or Fine Particulate Matter ($PM_{2.5}$) [40 CFR 93.105 (c)(1)(i)]

Project sponsors are required to conduct project level conformity analyses by the FHWA/FTA NEPA process. FHWA/FTA are responsible for making all project-level conformity determinations. FHWA/FTA, with the participation of U.S. EPA, identifies the applicable procedures for CO and/or $PM_{2.5}$ analyses. Project sponsors should use the most recently identified procedures. In accordance with 40 CFR 93.105 (c)(1)(i) and other applicable regulations, Ohio DOT will determine the following:

1. That FHWA/FTA, with U.S. EPA review participation, has approved the project-level CO and/or $PM_{2.5}$ conformity analyses which are included in the project's environmental document prior to initiating federal authorizations.

2. That the design concept and scope of the project has not changed significantly from that used by TMACOG and Ohio DOT in the most recent regional transportation conformity analyses of the RTP and TIP.

The TMACOG governing board or policy committee may periodically review and participate with Ohio DOT and other agencies as appropriate in the update of the CO and/or $PM_{2.5}$ analyses. Through the NEPA process, Ohio DOT may provide technical guidance to project sponsors who use these procedures.

VI. Monitoring of Transportation Control Measures (TCMs) [40 CFR 93.105 (c)(iv)]

As part of the conformity documentation for an RTP and/or TIP, TMACOG will identify the status of SIP TCMs. If TCM emissions reductions are included as part of the motor vehicle emissions budget, TMACOG will estimate the portion of emission reductions that have been achieved. If there are funding or scheduling issues for a SIP transportation control measure, TMACOG will describe the steps being undertaken to overcome these obstacles, including means to ensure that funding agencies are giving these TCMs maximum priority. TMACOG may propose substitution of a new TCM for all or a portion of an existing TCM that is experiencing implementation difficulties (see Section VII below).

VII. Substitution of TCMs in the SIP [40 CFR 93.105 (c)(iv)]

TMACOG shall prepare information on and documentation of the substitute TCM(s) and submit it to Ohio EPA and U.S. EPA for review and comment. Ohio EPA will work with TMACOG and U.S. EPA in order to ensure that the requested revision provides an emission reduction equivalent to the original SIP TCM(s) and will officially submit the document to U.S. EPA for approval. Following US EPA approval of the substitute TCM(s), TMACOG will amend the TCM in to its RTP and TIP and work with the affected project sponsor to implement the TCM.

VIII. Conflict Resolution [40 CFR 93.105 (d)]

Conflicts between any parties of this MOU that arise during consultation will be resolved as follows:

1. A statement of the nature of the conflict will be prepared and agreed to by the conflicting parties and shared with the remaining signatories.

2. Disagreeing parties will consult in a good faith effort to resolve the conflict in a manner acceptable to all parties.

3. If they are unsuccessful, the directors of the signatory agencies or their designees shall meet to resolve differences in a manner acceptable to all parties.

4. If none of the above steps produces a satisfactory resolution, any participant to this agreement has 14 days to appeal to the Governor. If a party other than Ohio EPA appeals to the Governor, that participant must inform the Ohio EPA of the Governor's response to the appeal. Ohio EPA has 14 calendar days from that notification to appeal to the Governor if it disagrees with the response. The implementation plan revision required by 40 CFR 51.390 shall define the procedures for starting the 14-day clock. If Ohio EPA appeals to the Governor, the final conformity determination must have the concurrence of the Governor. If Ohio EPA does not appeal to the Governor within 14 days, TMACOG, and Ohio DOT may proceed with the final conformity determinations. The Governor may delegate his or her role in the process, but the head or staff of Ohio EPA, Ohio DOT and TMACOG may not delegate their respective roles.

IX. Public Consultation Procedures [40 CFR 93.105 (e)]

TMACOG will follow its adopted public participation procedures when making conformity determinations on transportation plans and programs. These procedures establish a proactive public participation process which provides opportunity for public review and comment by, at a minimum, providing reasonable public access to technical and policy information considered by TMACOG at the beginning of the public comment period and prior to taking formal action on a conformity determination for the RTP and TIP, consistent with these requirements and those of 23 CFR 450.316(a). Meetings of TMACOG are open to the public. Any charges imposed for public inspection and copying should be consistent with the fee schedule contained in 49 CFR 7.43. TMACOG also shall provide opportunity for public participation in conformity determinations for projects where otherwise required by law.

MEMORANDUM OF UNDERSTANDING
TRANSPORTATION CONFORMITY
CONSULTATION PROCEDURES
Parties: TMACOG, Ohio EPA, Ohio DOT, FHWA, FTA and U.S.EPA

LIST of SIGNATORIES

Note: Signatures appear on separate, multiple pages.

Anthony Reams
President
Toledo Metropolitan Area Council of Governments

Chris Korleski
Director
Ohio Environmental Protection Agency

James G. Beasley, P.E., P.S.
Director
Ohio Department of Transportation

Mary Gade
Regional Administrator
Region 5
U.S. Environmental Protection Agency

Dennis Decker
Division Administrator
Ohio Division
Federal Highway Administration
FHWA-OH is lead for U.S. DOT

Marisol Simon
Regional Administrator
Region 5
Federal Transit Authority

MEMORANDUM OF UNDERSTANDING
TRANSPORTATION CONFORMITY
CONSULTATION PROCEDURES
Parties: TMACOG, Ohio EPA, Ohio DOT, FHWA, FTA and U.S. EPA

Note: Signatures appear on separate, multiple pages.

_____ **Date:** 3/11/08
Anthony Reams, President
Toledo Metropolitan Area Council of Governments

MEMORANDUM OF UNDERSTANDING
TRANSPORTATION CONFORMITY
CONSULTATION PROCEDURES
Parties: TMACOG, Ohio EPA, Ohio DOT, FHWA, FTA and U.S. EPA

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_____ **Date:** 1/23/08
Chris Korleski, Director
Ohio Environmental Protection Agency

MEMORANDUM OF UNDERSTANDING
TRANSPORTATION CONFORMITY
CONSULTATION PROCEDURES
Parties: TMACOG, Ohio EPA, Ohio DOT, FHWA, FTA and U.S. EPA

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James G. Beasley **Date:** 6/25/08

James G. Beasley, P.E., P.S., Director
Ohio Department of Transportation

MEMORANDUM OF UNDERSTANDING
TRANSPORTATION CONFORMITY
CONSULTATION PROCEDURES
Parties: TMACOG, Ohio EPA, Ohio DOT, FHWA, FTA and U.S. EPA

Note: Signatures appear on separate, multiple pages.

_____ **Date:** _____
Mary Gade, Regional Administrator
U.S. Environmental Protection Agency-Region 5

MEMORANDUM OF UNDERSTANDING
TRANSPORTATION CONFORMITY
CONSULTATION PROCEDURES
Parties: TMACOG, Ohio EPA, Ohio DOT, FHWA, FTA and U.S. EPA

Note: Signatures appear on separate, multiple pages.

_____ **Date:** 2/12/2008
Dennis Decker, Division Administrator
Federal Highway Administration-Ohio Division

MEMORANDUM OF UNDERSTANDING
TRANSPORTATION CONFORMITY
CONSULTATION PROCEDURES
Parties: TMACOG, Ohio EPA, Ohio DOT, FHWA, FTA and U.S. EPA

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_____ **Date:** _____
Marisol Simon, Regional Administrator
Federal Transit Authority-Region 5