

SECTION 2

INTRODUCTION

ORGANIZATION FOUNDATION

The Miami Valley Regional Planning Commission is responsible for ensuring comprehensive and coordinated development of the regional transportation system serving the designated MPO area including Greene, Miami and Montgomery Counties and the jurisdictions of Carlisle, Franklin, Springboro and Franklin Township in Warren County.

The transportation planning program is carried out under the direction of the members of MVRPC's Board of Directors that represent jurisdictions/organizations located within the MPO Boundary. The breakout is as follows: forty-six representatives (and forty-six votes) from jurisdictions located within Greene, Miami and Montgomery Counties, four representative (and four votes) from the cities of Carlisle, Franklin, Springboro, and Franklin Township in Warren County, three representatives from "Other Governmental/Non Governmental Members" (three votes), the three local transit authorities (three votes) and two ODOT representatives (two votes) for a total of 58 MPO members and votes.

PURPOSE

The purpose of the TIP is to ensure a closer relationship between the urban transportation planning process and the program of projects advanced for implementation with federal and state assistance and other regionally significant projects funded with other sources.

Because the TIP spans several modes of transportation, it is extremely important to properly review and coordinate the program development with other agencies, governmental units and transit operators for all federal, state and other regionally significant projects. The enclosed program for SFY2024-2027 was developed with input and assistance from various state and local officials. The resulting four-year Transportation Improvement Program is consistent with the region's needs and priorities.

REQUIREMENTS AND REGULATIONS

The MVRPC transportation programs comply with both the transportation conformity provisions resulting from the Clean Air Act and subsequent Amendments as well as the current Surface Transportation Reauthorization Bill, the "Infrastructure Investment and Jobs Act" (IIJA), signed into a law by the President on November 15, 2021. This section provides a summary of applicable elements of these regulations and laws.

PLANNING BOUNDARIES

The planning regulations require the boundaries of the metropolitan planning area to include the existing urbanized area plus the contiguous area expected to become urbanized within the 20-year planning period. Additionally, boundaries may be extended to encompass the entire combined statistical area or to include the entire non-attainment or maintenance area for ozone, carbon monoxide, or particulate matter. The Clark County-Springfield Transportation Coordinating Committee (CCS-TCC) serves Clark County and MVRPC serves Greene, Miami, Montgomery and northern Warren Counties. MVRPC officially expanded its transportation planning boundary to include the jurisdictions of Franklin, Carlisle (July 2003), Springboro (May

2006) and Franklin Township (July 2017) in Warren County, however for transportation conformity purposes the areas within Warren County are considered part of the Cincinnati Air Quality Region. To coordinate the activities required by the metropolitan planning process, including conformity, MVRPC maintains planning agreements with both CCS-TCC and OKI - the adjacent MPOs.

FINANCIAL CAPACITY

The planning regulations require a financial capacity determination, which realistically assesses available implementation funds for improvements.

Consistent with the 3-C planning process (continuing, cooperative and comprehensive), data was provided by all of the major planning partners (local project sponsors, ODOT and the transit providers). ODOT inflation factors are applied to all highway/bikeway projects and the transit providers apply inflation factors to all transit projects shown in the TIP. Thus the amounts shown from Federal, State and Local funding sources are shown in year-of-expenditure dollars.

The STIP (State Transportation Improvement Program)/TIP must be fiscally constrained, as such, MVRPC's and ODOT's highway fiscal analyses are included in Tables 4.7 and 4.8. For the Highway/Bikeway Program, the fiscal constraint will take ODOT's encumbrance based annual allocation into account. Table 4.7 - MVRPC'S Funding Plan shows a fiscal analysis for MVRPC's controlled funding sources. Table 4.8 summarizes all Federal, State and Local Match funds scheduled to be expended during SFY2024-2027. The ODOT STIP addresses the fiscal constraint for projects included in the TIP, financed with ODOT controlled funding sources. Fiscal analysis for transit is shown in the fiscally constrained transit tables (See Section 5) for each individual project sponsor. Consistent with federal regulations for Transportation Management Areas (TMA's), MVRPC limits projects shown in the first two years of the TIP to those with funds available or committed.

PUBLIC PARTICIPATION

Public participation is a key component in the IJJA with increased emphasis on visualization techniques, electronic availability of information, and expanded participation lists. One of the main purposes of the ODOT Project Development Process (PDP) is to ensure that the social, economic, and environmental effects of projects are identified early in the planning process in order to provide some of the information required for selecting the most beneficial alternative. Central to the success of the PDP is the early participation of private citizens, public officials, and interested agencies that represent a wide range of disciplines and areas of expertise. Specific project proposals are publicized through the early coordination and Intergovernmental Review process. Affected segments of the community are identified and tentative problems and/or issues concerning the projects are defined. These problems and issues are continuously refined as project development progresses. The PDP involvement is solicited through public meetings held on proposed projects, meetings with affected property owners, and circulating and/or advertising the availability of the draft environmental document. Formal public hearings may also be held in accordance with applicable local, state, and federal laws. Transit projects follow a similar public participation process.

In addition to the public participation conducted on individual projects, the Board of Directors has adopted the [Public Participation Policy](#). This document describes MVRPC's proactive and ongoing public participation procedures for all major transportation planning activities, including the TIP.

The TIP public input process includes two separate public input meetings throughout the TIP development process described in MVRPC's [Public Participation Policy](#). The initial public meeting for the TIP was held on January 17, 2023. All comments received were replied to if requested and the comments and replies were forwarded to project sponsors and MVRPC's TAC and Board for their consideration.

To increase the participation of citizens and organizations in the transportation planning process, MVRPC has developed and will maintain a mailing list notifying various groups and individuals of scheduled public participation meetings approximately three weeks before the meeting date. The goal of this mailing is to include groups not directly involved through the current structure of MVRPC's policy board. The list includes interested private citizens, transportation organizations/agencies, economic development interests, private transportation providers, freight representatives, environmental protection, cultural-historic resources, media outlets, and other pertinent groups identified by the IJJA legislation. In addition to groups identified by IJJA, MVRPC will add any interested party requesting placement on the mailing list.

The MVRPC TIP is part of ODOT's State Transportation Improvement Program (STIP) and as such will also be made available as part of the state public participation process. STIP public participation meetings will be conducted for projects located in the MVRPC planning area. Comments received through this process will be documented in the STIP.

In accordance with Executive Order 12898 on Environmental Justice (EJ), MVRPC developed its public participation policy to incorporate the regulations required by this order. Although MVRPC has historically made efforts towards the requirements of Environmental Justice, a concerted effort has been made to further seek out disadvantaged populations or otherwise EJ targeted groups to include them in the public participation process. These efforts included:

- Expanding mailing list to include EJ populations (low-income and minority) as well as other vulnerable populations including older adults, individuals with disabilities and all public libraries.
- Adapting advertising for ease of understanding including special articles and flyers.
- Submitting press releases to all local newspapers, television and radio stations – approximately 89 media outlets.
- Advertising at GDRTA Hubs via English and Spanish posters and providing posters to Greene CATS and Miami County Transit.
- Printing a public notice in the *Dayton Daily News* and newspaper ads announcing the public meetings in *La Mega Nota*, an English and Spanish publication, and the *Dayton Weekly News*, a predominately urban-based target audience.
- Offering an English-to-Spanish translator on MVRPC's website.
- Posting public meeting announcements on social networking sites such as Twitter and Facebook including boosted posts.
- Both English and Spanish posters are also distributed to the Latino Connection, an East Dayton neighborhood-based outreach group which assists Hispanics in a variety of capacities.
- Posting the information being presented at the meeting, on the MVRPC website along with an online comment card and making this same information available for review at the MVRPC offices in downtown Dayton.

TIP ADA COMPLIANCE

Ohio MPOs actively incorporate the transportation provisions of the Americans with Disabilities Act (ADA) of 1990 into their urban transportation planning programs. The purpose of ADA is to ensure that pedestrians with disabilities have opportunity to use the transportation system in an accessible and safe manner. An integral component of the ADA planning process is for local government, transportation infrastructure owners, to prepare and implement ADA Transition Plans that inventory accessibility conditions and define strategies and schedules for implementing fully accessible pedestrian networks.

MVRPC is incorporating ADA Transition Planning into regional transportation planning programs, as follows:

- Surveying member local governments to establish and determine whether they have active ADA Transition Plans.
- Reviewing local government transportation improvement project funding requests for consistency with ADA accessibility standards.
- Coordinating discussions between ODOT District staff and MVRPC Technical Advisory Committee members regarding ADA Transition Plans and educational opportunities.

COMMUNITY IMPACT ASSESSMENT

Title VI of the 1964 Civil Rights Act states that no person shall, on the grounds of race, color, national origin, sex, disability, age, or income status, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any programs or activity receiving Federal financial assistance.

As a recipient of Federal transportation funds, MVRPC provides assurance of compliance (<https://www.mvrpc.org/sites/default/files/public-notice-compliance-non-discrimination-acts.pdf>) with U.S. Department of Transportation requirements in regards to Title VI and civil rights.

MVRPC's Title VI program is described in a document entitled ***Miami Valley Regional Planning Commission Title VI Program Procedures Description***

(https://www.mvrpc.org/sites/default/files/mvrpc_agency_title_vi_program_procedures_description.pdf), which includes instructions on how to file a complaint and as well as a complaint form.

As recipients of Federal funds, MVRPC and their contractors, subcontractors, material suppliers, vendors, and consultants must:

- Ensure nondiscrimination in all of their programs and activities, whether those programs and activities are Federally funded, or not. The factors prohibited from consideration as a basis for discriminatory action or inaction include race, color, national origin, sex, age and disability.
- Provide Equal Employment Opportunity by not discriminating in employment based on race, color, religion, sex, national origin, age, or disability.

MVRPC analyzed the distribution of TIP projects with respect to Environmental Justice populations (low-income and minority) as well as other vulnerable populations (such as older adults and individuals with disabilities) deemed of interest to the transportation planning process using data summarized at the Traffic Analysis Zone (TAZ) level. All TIP projects, with the exception of area-wide programs and projects, slated for construction during SFY 2024-2027, were overlaid on top of the region's six target population maps for analysis. TAZ's with an

above or equal to county average population threshold for each target population were identified as focus areas. The analysis was conducted to assure that the focus areas are receiving a proportionate share of TIP project funds relative to the region's general population. Table 2.1 displays the allotment of total TIP project costs and project distribution throughout the region.

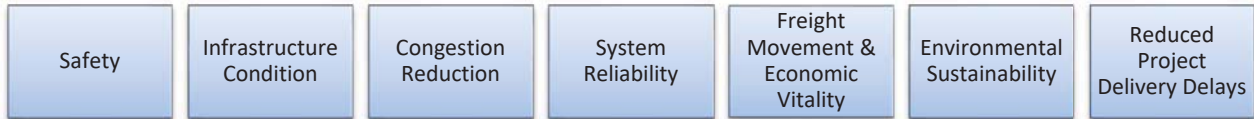
Table 2.1: Distribution of TIP Projects with Respect to Target Populations

(A summary of TIP projects will be provided in the Final TIP).

For an evaluation of transit and bike projects and for further information regarding MVRPC's approach to Title VI compliance and Environmental Justice, please refer to [Chapter 10 of MVRPC's 2050 Long Range Transportation Plan](#).

TRANSPORTATION PERFORMANCE MANAGEMENT

The Infrastructure Investment and Jobs Act (IIJA) continues to place emphasis on the performance management approach first specified in the Moving Ahead for Progress in the 21st Century Act (MAP-21). It requires state DOTs, transit agencies, and MPOs to establish performance and outcome-based programs in several national priority areas, which are:



While the various rules have different deadlines, generally, after a state DOT or transit agency adopt targets for a particular rule, MPOs have 180 days from the date targets are established to adopt their own targets or support the states' or transit agencies'. To date, MVRPC has decided to support the ODOT's targets for all applicable measures and has adopted the Region's transit agencies' targets.

To track progress related to performance management, MVRPC has created a [Performance Management Webpage](#). This page provides an overview presentation of the performance management approach and lists milestones and adoption documentation related to the various performance rules. To date, MVRPC has adopted/supported targets related to transit asset management and safety as well as highway safety, pavement and bridge conditions, system reliability, CMAQ emissions, Peak Hour Emission Delay, and Non-Single Occupancy Vehicle Travel.

The System Performance Report ([Chapter 8 of the LRTP](#)) provides an in-depth look at the performance management approach and an overview of each highway and transit performance measure including baseline conditions and future targets.

(The Final TIP will provide a summary of the anticipated effect the TIP programs and projects have in helping achieve the various rules' targets).

OPERATION AND MAINTENANCE OF EXISTING TRANSPORTATION SYSTEM

The TIP is required to demonstrate that existing transportation facilities are being adequately operated and maintained by showing the operation and maintenance funds. Section 3 Accomplishments includes a discussion on how the region's existing transportation system is being adequately operated and maintained. We estimate that the region overall is spending **XX.XX**% of the total local roadway expenditures on system preservation type projects. This is consistent with the previous TIP analysis that estimated approximately 83.69% of total local roadway expenditures were for system preservation type projects. System preservation projects are essential to the long-term viability of the region's transportation system.

AIR QUALITY

Ozone Standard

In April 2004, the United States Environmental Protection Agency (U.S. EPA) issued final designations regarding the 1997 8-hour ozone standard. The 1997 8-hour standard is violated when the 3-year average of the annual fourth highest daily maximum 8-hour ozone average concentration exceeds 0.08 ppm (parts per million). All four counties (Clark, Greene, Miami, and Montgomery) in the Dayton/Springfield Region (D/S Region) and Warren County in the Cincinnati Region were designated as basic non-attainment for ozone. The D/S Region was designated to attainment/maintenance for 1997 ozone in August 2007 and the Cincinnati Region was designated to attainment/maintenance for 1997 ozone in May 2010. The Cincinnati Region is also designated as maintenance for the 2008/2015 ozone standards.

On March 6, 2015, U.S. EPA published the final rule for the Implementation of the 2008 NAAQS for Ozone: State Implementation Plan Requirements, 80 FR 12264, effective April 6, 2015. The final rule revoked the 1997 ozone standard for all purposes including transportation conformity but on February 16, 2018, the U.S. Court of Appeals for the District of Columbia Circuit on the South Coast II Court Case held that transportation conformity determinations must continue to be made in those areas ("orphan areas"). As an ozone orphan area and consistent with U.S. EPA's November 29, 2018 guidance and interagency consultation, MVRPC will advance a qualitative Long Range Transportation Plan (LRTP) and new SFY2024–2027 TIP transportation conformity determination as documented in Table 2.3.

Table 2.3 — MVRPC Transportation Conformity Requirements

Requirements	Documentation
Latest planning assumptions	<ul style="list-style-type: none"> MVRPC maintains a travel demand model with current socio-economic variables and highway/transit networks used to develop the LRTP. For the 2050 LRTP update both the socio-economic data and networks have been updated to 2050.
Consultation	<ul style="list-style-type: none"> Interagency consultation was conducted in December 2022-January 2023, documentation can be found in Appendix A Consistent with MVRPC’s Public Participation Policy, a public participation meeting for the final TIP was held on April 6, 2023 with a public comment period between March 21 and April 19, 2023. The SFY 2024-2027 TIP was adopted by the MVRPC Board of Directors on May 4, 2023 (Anticipated)
Transportation Control Measures (TCMs)	<ul style="list-style-type: none"> There are no TCMs in the Dayton/Springfield air quality Region State Implementation Plan (SIP)
Fiscal Constraint	<ul style="list-style-type: none"> All non-exempt projects in the MVRPC region are included in 2050 LRTP and TIP (if within the TIP years SFY2024-2027). Costs for these projects are included in the fiscal constraint analysis for the respective documents.

Table 2.4, prepared by the Ohio Kentucky Indiana Regional Council of Governments, shows that the Ohio portion of the Cincinnati non-attainment area demonstrates conformity to the 8-hour ozone standards of the State Implementation Plan (SIP). Technical details of the analysis and additional documentation can be found in **Chapter XX** of the OKI FY 2024-2027 TIP.

Table 2.4 — Quantitative Conformity Findings of Ozone-forming Emissions (tons per day) for the Ohio Portion* of the 2015 Ozone NAAQS Maintenance Area (Draft)

	2026	2035	2040	2050
Ohio VOC Budget	14.15	10.58	10.58	10.58
Ohio VOC Emissions	12.58	9.35	6.60	6.35
Ohio NO _x Budget	25.30	18.98	18.98	18.98
Ohio NO _x Emissions	21.06	15.28	14.24	14.20

*Includes the Counties of Butler, Clermont, Hamilton, and Warren in Ohio.

Fine Particulate Standard

In December 2004, the U.S. EPA issued air quality designations regarding the 1997 fine particulate (or PM 2.5) standard. The Clark, Greene, Montgomery, and Warren Counties were designated non-attainment for the annual PM 2.5 standard. The annual standard is exceeded if the 3-year average of annual mean PM2.5 concentrations is greater than 15 micrograms per cubic meter. The D/S Region was re-designated to attainment/maintenance for PM 2.5 on September 26, 2013 and the Cincinnati Region was designated to attainment/maintenance for PM 2.5 in 2011. In August 24, 2016, U.S. EPA published the final rule for the Implementation of

the Fine Particulate Matter National Ambient Air Quality Standards: State Implementation Plan Requirements, 81 FR 58010, effective October 24, 2016. The final rule revokes the 1997 PM 2.5 standard for all purposes including transportation conformity.

With the revocation of the PM 2.5 standard, areas that have already been re-designated to attainment no longer have to demonstrate conformity.

STATUS OF MAJOR PROJECTS IN SFY2021-2024 TIP

There were no SFY2021-2024 projects that experienced significant delays.

ANNUAL LISTING OF PROJECTS

Table 3.5 in Section 3 includes a listing of projects for which federal funds are anticipated to be obligated during SFY2023 **(FINAL TIP ONLY)**.

CONGESTION MANAGEMENT PROCESS (CMP)

The planning regulations require urban areas with a population over 200,000 to address congestion management through a process that provides for safe, effective, integrated management of the multimodal transportation system. A Congestion Management Process summary report is published by MVRPC approximately every 4 years, providing an overview of the multimodal system performance and regional congestion management strategies. The report was last published in May 2015 with the results/recommendations incorporated into the 2021 update of the Long Range Transportation Plan.

TIP PRIORITIZATION PROCESS

MVRPC's ***Policies and Procedures for Considering Major New Capacity Projects (TRAC Projects)*** were last published in April, 2022. In September of 2022, the Board of Directors adopted updates to the ***MVRPC Suballocated Funding Policy***. Both policies are continually updated to address IJA issues as well as changes in Ohio Department of Transportation (ODOT) regulations. The underlying data behind the Project Evaluation System (safety, congestion, etc.) is also updated periodically.

MVRPC Policies and Procedures for Suballocated Funding and Major New Capacity programs are available at www.mvrpc.org. These policies and procedures state that all projects must be consistent with one or more of the 10 factors required by the Federal legislation prior to being evaluated for inclusion into the TIP. Some smaller projects, such as system preservation projects, may not be specifically listed in the LRTP but they are considered consistent with the LRTP's goals and objectives. All projects listed in the TIP are consistent with the LRTP.

MVRPC CONTROLLED FUNDING SOURCES

MVRPC originally developed the [Project Evaluation System](#) (PES) for the 2004 LRTP in order to advance transportation projects that are consistent with regional transportation priorities. The PES was based on the common themes and transportation values identified by the 2003 visioning process *TransAction 2030*. Since then, PES has been used to prioritize projects seeking MVRPC controlled STP/CMAQ/TA & CR funds, TRAC funds and Federal Earmarks. In 2019, MVRPC staff worked with a PES Update Committee, comprising 15 TAC or Board members representing MPO member agencies and communities, to undertake a major review of the PES. Following an analysis of the projects funded over the previous decade, the

motivation for the 2019 update was to better align the criteria with the type of projects that are currently being funded, and to incorporate equity criteria and a performance management approach for project scoring and selection.

The PES is available on the MVRPC website (www.mvrpc.org) along with all relevant information and the MVRPC staff works with participants to ensure a full understanding of the process, including hosting a seminar for project sponsors. Project Evaluation Forms are unique to the mode of the project (highway, bikeway/pedestrian, transit).

The PES is made up of two different project ranking categories, first being the Basic Project Evaluation System (PES) score and the second being the Project Readiness/Other score.

The first category, the **Basic PES** score, measures 20 indicators from categories including Regional Context/Cooperation, Transportation Choices, Transportation System Management, Land Use, Economic Development and Environment. A maximum total of 70 points is possible under the Basic PES scoring system.

The second category, **Project Readiness/Other**, is made up of ranking criteria that are designed to measure project maturity and fairly and equally evaluate all traditional and non-traditional projects. A maximum total of 30 points is possible under the project readiness/other score.

The final project score is a combination of the Basic PES score (maximum total of 70 points) and the Project Readiness/Other score (maximum total of 30 points) for a maximum combined score of 100 points.

Once all Project Evaluation Forms are received, MVRPC staff confirms that potential capacity projects are consistent with the 2050 LRTP and the most recent Transportation Conformity Determination and then reviews them for consistency, accuracy, and completeness of data for each individual project. A cross-examination of all projects is also conducted to ensure that the evaluation remains equitable.

ODOT CONTROLLED FUNDING SOURCES

ODOT has a standard project selection process for each type of program that they administer. Information about the various programs and ODOT's project selection processes can be found at www.dot.state.oh.us. Once ODOT has selected a project within the MVRPC region for funding, the project is first reviewed for consistency with the LRTP and then presented to MVRPC's TAC and Board for final approval and inclusion in the TIP.

CONSISTENCY WITH THE LONG RANGE TRANSPORTATION PLAN AND CONFORMANCE WITH STATE IMPLEMENTATION PLAN

MPO's are required to review and approve all projects recorded in the TIP (both MPO funded and ODOT funded) and demonstrate the project's consistency with the LRTP.

MVRPC's transportation goals and objectives were redefined in 2003 as a result of a community-based visioning process known as TransAction 2030. The objective was to identify the collective transportation values of the communities in the Region and develop a shared transportation vision, along with measurable criteria that could be applied to potential projects to gauge their consistency with the vision. TransAction 2030 involved soliciting input from stakeholders in the Region by applying various tools and methods. Based on this input,

transportation goals were identified and incorporated into the MVRPC Strategic Plan. In May of 2007, MVRPC revised the Plan's goals and objectives to incorporate "security" into its transportation system management objective as per SAFETEA-LU requirements.

The Board of Directors reaffirmed the goals and objectives for use in the 2021 LRTP update in October 2020. The transportation goals are included in MVRPC's Strategic Plan under the larger umbrella of Regional Stewardship, Vibrant Communities, Vigorous Economy, and Sustainable Solutions.

Regional Stewardship

- Develop Regional Priorities — Continue to address regional transportation needs that further the shared social, economic, transportation and environmental goals of the Region.

Vibrant Communities

- Transportation Choices — Encourage a stronger multi-modal network in the Region to ensure that people and goods reach their destination safely, efficiently, and conveniently.
- Transportation System Management — Continue to maintain and upgrade the regional transportation system by providing safety, security, aesthetic, and capacity improvements as needed.
- Transportation and Land Use — Incorporate regional land use strategies into the transportation policy and the investment decision making process.

Vigorous Economy

- Transportation — Continue to address regional transportation needs to enhance economic development in order to attract and retain businesses in the Region while improving the quality of life of its residents.

Sustainable Solutions

- Clean Air — Encourage the pursuit of alternative fuels to reduce emissions and our reliance on petroleum-based products.

In order to document that all projects in the TIP have been reviewed and approved for their consistency with the LRTP, every project shown in Tables 4.1-4.6 has been assigned a LRTP Goal number based on Table 2.5 below:

Table 2.5 — TIP Project Consistency with LRTP Goals

Goal #	Goal-Objective	Description
G1	Regional Stewardship- Develop Regional Priorities	Continue to address regional transportation needs that further the shared social, economic, transportation and environmental goals of the Region.
G2-1	Vibrant Communities- Transportation Choices	Encourage a stronger multi-modal network in the Region to ensure that people and goods reach their destination safely, efficiently, and conveniently.
G2-2	Vibrant Communities- Transportation System Management	Continue to maintain the regional transportation system.
G2-3	Vibrant Communities- Transportation System Management	Continue to upgrade the regional transportation system by providing safety, security, aesthetic, and capacity improvements as needed.
G2-4	Vibrant Communities- Transportation and Land Use	Incorporate regional land use strategies into the transportation policy and the investment decision making process.
G3	Vigorous Economy	Continue to address regional transportation needs to enhance economic development in order to attract and retain businesses in the Region while improving the quality of life of its residents.
G4	Sustainable Solutions	Encourage the pursuit of alternative fuels to reduce emissions and our reliance on petroleum-based products.

CERTIFICATION OF THE METROPOLITAN PLANNING PROCESS

The final planning regulations require the Secretary of Transportation to certify the metropolitan planning process for TMA's at least every 4 years. A joint FHWA/FTA certification review was conducted on September 8, 2021. Based upon their findings, FHWA/FTA jointly certified the MVRPC transportation planning process for the Dayton urban planning area on November 10, 2021.

In addition, the regulations also require the State and MPO's to biennially certify to the FHWA and FTA that the planning process is addressing the major issues facing the area and is being conducted in accordance with all applicable federal requirements. A separate resolution self-certifying conformance with applicable federal requirements will be submitted with the final TIP.