

*Macon Area
Transportation Study*

2050 Metropolitan
Transportation Plan and
FY 2024 - 2027
Transportation
Improvement Program

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Acknowledgements

This *Transportation Conformity Report* for the 2050 Macon Area Transportation Study Metropolitan Transportation Plan (2050 MTP) and FY 2024 - 2027 Transportation Improvement Program (TIP) was prepared by Macon Area Transportation Study. Individuals from the following agencies contributed their efforts towards the completion of the Transportation Conformity Determination Report. They include:

- U.S. EPA Region 4
- U.S. Federal Highway Administration, Region 4
- Georgia Department of Transportation, Office of Planning
- Georgia Department of Transportation, Intermodal Division
- Macon-Bibb County Transit Authority
- Macon Area Transportation Study MPO
- Georgia Environmental Protection Division

Executive Summary

As part of its transportation planning process, Macon Area Transportation Study completed the transportation conformity process for the original 2050 MTP and FY 2024 - 2027 TIP. This report documents that the 2050 MTP and FY 2024 - 2027 TIP meet the federal transportation conformity requirements in 40 CFR Part 93.

Clean Air Act (CAA) section 176(c) (42 U.S.C. 7506(c)) requires that federally funded or approved highway and transit activities are consistent with (“conform to”) the purpose of the State Implementation Plan (SIP). Conformity to the purpose of the SIP means that transportation activities will not cause or contribute to new air quality violations, worsen existing violations, or delay timely attainment of the relevant NAAQS or any interim milestones. 42 U.S.C. 7506(c)(1). EPA’s transportation conformity rules establish the criteria and procedures for determining whether metropolitan transportation plans, transportation improvement programs (TIPs), and federally supported highway and transit projects conform to the SIP. 40 CFR Parts 51.390 and 93.

On February 16, 2018, the United States Court of Appeals for the District of Columbia Circuit in *South Coast Air Quality Mgmt. District v. EPA* (“*South Coast II*,” 882 F.3d 1138) held that transportation conformity determinations must be made in areas that were either nonattainment or maintenance for the 1997 ozone national ambient air quality standard (NAAQS) and attainment for the 2008 ozone NAAQS when the 1997 ozone NAAQS was revoked. These conformity determinations are required in these areas after February 16, 2019. The Macon Area was a “maintenance” area at the time of the 1997 ozone NAAQS revocation on April 6, 2015 and was also designated attainment for the 2008 ozone NAAQS on May 21, 2012. Therefore, per the *South Coast II* decision, this conformity determination is being made for the 1997 ozone NAAQS on the MTP and TIP.

This conformity determination was completed consistent with CAA requirements, existing associated regulations at 40 CFR Parts 51.390 and 93, and the *South Coast II* decision, according to EPA’s *Transportation Conformity Guidance for the South Coast II Court Decision* issued on November 29, 2018.

1.0 Background

1.1 Transportation Conformity Process

The concept of transportation conformity was introduced in the Clean Air Act (CAA) of 1977, which included a provision to ensure that transportation investments conform to a State implementation plan (SIP) for meeting the Federal air quality standards. Conformity requirements were made substantially more rigorous in the CAA Amendments of 1990. The transportation conformity regulations that detail implementation of the CAA requirements were first issued in November 1993, and have been amended several times. The regulations establish the criteria and procedures for transportation agencies to demonstrate that air pollutant emissions from metropolitan transportation plans, transportation improvement programs and projects are consistent with (“conform to”) the State’s air quality goals in the SIP. This document has been prepared for State and local officials who are involved in decision making on transportation investments.

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

Figure 1 below shows the boundaries of the Macon air quality monitoring area. Macon was initially designated Non-Attainment for the 1997 8-Hour Ozone NAAQS, effective 15 June 2004 (69 FR 23857). The area was redesignated as Maintenance for the 1997 8-Hour Ozone NAAQS, effective on 19 October 2007 (72 FR 53432). Macon was more recently designated Attainment for the stricter 2008 and 2015 8-Hour Ozone NAAQS, effective on 20 July 2012 (77 FR 30087) and 3 August 2018 (83 FR 25776), respectively.



As of 22 May 2023, the last design value (2020 – 2022) for the Macon air quality monitoring area is **0.058 ppm**. This value falls below the 1997 8-Hour Ozone NAAQS (at or below **0.084** parts per million (ppm)), 2008 8-Hour Ozone NAAQS (at or below **0.075 ppm**) and 2015 8-Hour Ozone NAAQS (at or below **0.070 ppm**) levels.

MATS 1997 Ozone Air Quality Management Area



The Macon-Bibb County's infrastructure records, drawings, and other documents have been gathered over many years, using differing standards for quality control, documentation, and verification. All of the data provided represents current information in a readily available format. While the data provided is generally believed to be accurate, occasionally it proves to be incorrect; thus its accuracy is not warranted. Prior to making any property purchases or other investments based in full or in part upon the material provided, it is specifically advised that you independently field verify the information contained within our records. Date: 4/5/2010

Legend

-  Macon 8 Hour Ozone 1997 NAAQS Area
-  MATS Boundary
-  MATS Counties

1 inch = 32,425 feet

Map Maker: Michael J. Greenwald, Ph.D., AICP



2.0 MATS 2050 Metropolitan Transportation Plan Update

The [MATS Metropolitan Transportation Plan \(MTP\)](#) is the list of specific transportation projects for the MATS planning area. The MTP is designed to forecast demand for transportation services at least 20 years into the future (current target plan year is 2050), taking into account anticipated population growth, housing needs and employment goals for the region.

The MTP is developed in accordance with requirements set forth in Code of Federal Regulations Title 23, Section 450 (23 CFR 450) and serves as the official list of federally funded transportation projects and priorities throughout the Macon region. See Figure 1 for exact boundaries of the MATS boundary covered by the MTP.

The number and priority of projects on that list can be altered, based on the procedures laid out in the MATS Public Participation Plan. The latest full update to the MATS MTP was formally adopted on 3 May 2022, with subsequent amendments to reflect adoption of State of Georgia specific performance measure targets established as part of the Fixing America's Surface Transportation Act (FAST Act) of 2015, incorporation of electric busses into the Macon Transit Authority fleet, and removal of obsolete road and bridge projects.



3.0 MATS FY 2024 - 2027 Transportation Improvement Program (TIP)

The [MATS Transportation Improvement Program \(TIP\)](#) is the list of projects under consideration by MATS and Georgia Dept. of Transportation for construction or completion over the period covered in the plan dates. The main difference between the TIP and the MTP is that where the MTP is a list of all projects, TIP projects are active and at various stages of execution (i.e., Preliminary Engineering, Right Of Way acquisition, or Under Construction). The federally required update period for the TIP is every 4 years, although States and MPOs can have policies to update more frequently if they see fit. The current MATS TIP (adopted September 28, 2023) covers fiscal years 2024 through 2027 (for the purposes of the TIP, the fiscal year is July 1 through June 30). For this Conformity Determination Report, the MATS FY 2024 – 2027 TIP adopted on September 28, 2023 (and subsequently modified through Administrative Modifications and Amendments, in accordance with the processes specified in the MATS Public Participation Plan) is hereby reaffirmed.

The FY 2024 – 2027 TIP document was generated in consultation with the MATS member organizations, Georgia Dept. of Transportation, and FHWA, in accordance with requirements set forth in 23 CFR 450. The MATS FY 2024 – 2027 TIP maintains all fiscal balancing requirements set forth in 23 CFR 450, consistency with project listings in the MATS 2050 Long Range Transportation Plan, and conformity with the 1997 ozone NAAQS per the court's decision in *South Coast II* (see section 4.0 below).

4.0 Transportation Conformity Determination: General Process

Per the court's decision in *South Coast II*, beginning February 16, 2019, a transportation conformity determination for the 1997 ozone NAAQS will be needed in 1997 ozone NAAQS nonattainment and maintenance areas identified by EPA¹ for certain transportation activities, including updated or amended metropolitan MTPs and TIPs. Once US DOT makes its 1997 ozone NAAQS conformity determination for the MATS 2050 MTP and FY 2024 - 2027 TIP, conformity will not be required for up to four years (assuming no other conformity trigger). This conformity determination report will address transportation conformity for the MATS 2050 MTP and FY 2024 - 2027 TIP.

5.0 Transportation Conformity Requirements

Overview

On November 29, 2018, EPA issued **Transportation Conformity Guidance for the South Coast II Court Decision**² (EPA-420-B-18-050, November 2018) that addresses how transportation conformity determinations can be made in areas that were nonattainment or maintenance for the 1997 ozone NAAQS when the 1997 ozone NAAQS was revoked, but were designated attainment for the 2008 ozone NAAQS in EPA's original designations for this NAAQS (May 21, 2012).

The transportation conformity regulation at 40 CFR 93.109 sets forth the criteria and procedures for determining conformity. The conformity criteria for MTPs and TIPs include: latest planning assumptions (93.110), latest emissions model (93.111), consultation (93.112), transportation control measures (93.113(b) and (c), and emissions budget and/or interim emissions (93.118 and/or 93.119). For the 1997 ozone NAAQS areas, transportation conformity for MTPs and TIPs for the 1997 ozone NAAQS can be demonstrated without a regional emissions analysis, per 40 CFR 93.109(c). This provision states that the regional emissions analysis requirement applies one year after the effective date of EPA's nonattainment designation for a NAAQS and until the effective date of revocation of such NAAQS for an area. The 1997 ozone NAAQS revocation was effective on April 6, 2015, and the *South Coast II* court upheld the revocation. As no regional emission analysis is required for this conformity determination, there is no requirement to use the latest emissions model, or budget or interim emissions tests.

Therefore, transportation conformity for the 1997 ozone NAAQS for MATS 2050 MTP and FY 2024 - 2027 TIP can be demonstrated by showing the remaining requirements in Table 1 in 40 CFR 93.109 have been met. These requirements, which are laid out in Section 2.4 of EPA's guidance and addressed below, include:

- Latest planning assumptions (93.110)

¹ 1 The areas identified can be found in EPA's "Transportation Conformity Guidance for the South Coast II Court Decision, EPA-420-B-18-050, available on the web at: www.epa.gov/state-and-local-transportation/policy-and-technical-guidance-state-and-local-transportation.

² Available from <https://www.epa.gov/sites/production/files/2018-11/documents/420b18050.pdf>

- Consultation (93.112)
- Transportation Control Measures (93.113)
- Fiscal constraint (93.108)

5.1 Latest Planning Assumptions

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

The Georgia SIP does not include any TCMs for the MATS area.

5.2 Consultation Requirements

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

Public consultation was conducted consistent with planning rule requirements in 23 CFR 450. This 2050 Conformity Determination Report was originally developed by consultation with the Interagency Consultation (IAC) participants via conference calls between July 13, 2023 and August 21, 2023. The following Conformity Determination Review consultation practices were originally adopted by the MATS Policy Committee, based on IAC staff consultations from December 2018 through April 2019 (see Appendix A for full transcript):

- Consultation among IAC members may take place via e-mail, and e-mail communication recommending, editing, accepting or otherwise adjudicating a proposed amendment to the MATS MTP or MATS TIP is acceptable;
- The following template language shall be applied to any forthcoming amendments to the MATS MTP and current MATS TIP:
“In accordance with requirements under Federal regulations and the most recent guidance related to the designation of the MATS area as Maintenance area for the 1997 8-hour Ozone air quality standard, MATS hereby states:
 - The proposed project Is/Is Not Exempt from air quality impact analysis for Ozone;
 - The proposed project update meets fiscal constraint requirements of the Long Range Transportation Plan, as required under 23 CFR 450.324(11);
 - The proposed project update has been evaluated against the most recent planning assumptions, pursuant to 40 CFR 93.110. Because the latest applicable conformity determination for the MATS region does not identify any required Transportation Control Measures (TCMs), none have been applied in the evaluation of the proposed project update;
 - Pursuant to 40 CFR 93.109(c), the proposed project update does

not create the requirement for a regional emissions analysis. MATS latest conformity review with a regional emissions analysis was completed on 4/27/2016 by U.S. Department of Transportation, in coordination with U.S. EPA Region 4. At that time, the MATS MPO region was found to be in conformity with applicable National Ambient Air Quality Standards.

- The comment period for IAC review of a proposed amendment shall be fourteen (14) days. If no comments are sent via e-mail to the IAC, MATS may assume the proposal may proceed through the remainder of the MTP and/or TIP Amendment process;
- The IAC review period for amendments may run concurrently with the public review process as described in the MATS Public Participation plan.

Finally, since the updated Conformity Determination Report is considered part of the MTP and TIP, this draft was reviewed by IAC members, then circulated for public comment pursuant to the procedures specified in the MATS Public Participation Plan.

5.3 Timely Implementation of TCMs

The Georgia SIP does not include any TCMs for the MATS area

5.4 Fiscal Constraint

Transportation conformity requirements in 40 CFR 93.108 state that transportation plans and TIPs must be fiscally constrained consistent with DOT's metropolitan planning regulations at 23 CFR part 450. The MATS 2050 MTP and MATS FY 2024 - 2027 TIP are fiscally constrained, as demonstrated in the MATS 2050 MTP Chapter 8 - Fiscal Constraint.

Conclusion

The conformity determination process completed for the MATS 2050 MTP and MATS FY 2024 - 2027 TIP demonstrates that these planning documents meet the Clean Air Act and Transportation Conformity rule requirements for the 1997 ozone NAAQS.

Amendments

From time to time, it may become necessary to amend this Conformity Determination Report. In the event such are required, they will be incorporated pursuant to the requirements set forth in 23 CFR 450.316 and the procedures set forth in the MATS Public Participation Plan.

The adopted amendments to this document are listed below, in chronological order:

- **September 28, 2023 - The MATS MPO Transportation Conformity Determination Report for the 1997 Ozone NAAQS was updated to reflect the following amendments:**

- An updated Design Value for areas previously designated “Nonattainment” for the 1997 8-Hour Ozone NAAQS. The updated design value was changed from 0.064 ppm to 0.058 ppm. This change reflects the updated modeling period 2020 - 2022 (published by U.S. EPA on 5/23/2023), compared to the original 2017 - 2019 modeling period used as part of the adoption of the original MATS MPO Transportation Conformity Determination Report for the 1997 Ozone NAAQS associated with the MATS 2050 Metropolitan Transportation Plan.
- Adoption of the FY 2024 - 2027 TIP. The FY 2024 - 2027 TIP reference replaces, throughout the document, the reference to the original FY 2021 - 2024 TIP (originally adopted on November 4, 2020).

APPENDIX

Original Request for IAC Consultation on MATS FY 2024 - 2027 TIP Adoption: July 19, 2023

Michael Greenwald

From: Michael Greenwald
Sent: Wednesday, July 19, 2023 3:27 PM
To: Day, Ann-Marie (FHWA); Lewis, Olivia D. (FHWA); Myers, Dianna (she/her/hers); gil.grodzinsky@dnr.ga.gov; LaRocca, Sarah; Phil M. Peevy (ppeevey@dot.ga.gov); mcanizares@dot.ga.gov; Ted Kicks; Jackie Williams; 'McLloyd, Johnathan G'; 'Walker, Robin'; 'craigross@mta-mac.com'; Jeff Ruggieri; Greg Brown; Freund, Weston (he/him/his); Jarvis, Simone (she/her/hers)
Subject: IAC Consultation Request--New MATS FY 2024 - 2027 TIP, and Related Amendments to the MATS 2050 Air Quality Conformity Determination Report
Attachments: TIP2024_2027_DRAFT_20230719_DRAFT_MJG.pdf; Chapter06_Roads_and_Bridges_Projects_20220613_UPDATE.pdf; MATS_AirQualityConformityDeterminationReport_2050MTP_20230719_DRAFT.pdf
Importance: High

Good afternoon IAC members,

Pursuant to the requirements of the 2050 Air Quality Conformity Determination for the MATS MPO area (MATS 2050 AQCD; adopted by MATS 5/3/2022), MATS MPO is submitting the attached documentation for review and comments on the proposed MATS FY 2024 – 2027 TIP, and related amendments to aforementioned MATS 2050 ACQD. These documents are anticipated to be released for a 30 day public comment period (pursuant to the requirements set forth in the MATS Public Participation Plan: https://www.maconmpo.com/wp-content/uploads/2021/10/MATS_PublicParticipationPlan_20211013-FINAL.pdf, pg. 13) sometime **between August 2, 2023 and August 7, 2023**.

Final adoption of the FY 2024 – 2027 TIP and amended MATS 2050 ACQD is currently anticipated in mid to late September. Specific dates are yet to be determined, but in no event shall such adoption be scheduled before the receipt and response to comments from both this IAC group and the general public.

In response to the comments received during yesterday's IAC staff coordination call, the following documents are attached to this message:

- **TIP2024_2027_DRAFT_20230719_DRAFT_MJG.pdf** – This is the draft PDF document for the proposed MATS FY 2024 – 2027 TIP. This version reflects minor edits recommended by Dr. Gil Grodzinsky, in his e-mail to MATS MPO staff, dated 7/13/2023.
- **Chapter06_Roads_and_Bridges_Projects_20220613_UPDATE.pdf** – This is the Roads and Bridges chapter of the MATS 2050 MTP (the complete MATS 2050 MTP document can be found here: https://www.maconmpo.com/wp-content/uploads/2023/05/MATS2050MTP_AMENDED_20230503.pdf). This MTP chapter is included here as a reference, in response to FHWA's request during the staff coordination call yesterday for confirmation that all projects in the proposed FY 2024 – 2027 TIP are reflected in the 2050 MTP document. The specific road and bridge projects identified in Chapter 2 of the draft FY 2024 – 2027 TIP can be found Table 6-2 of this attached chapter of the MATS 2050 MTP document. This chapter was amended most recently on 6/13/2022. This chapter is not subject to any amendments at this time.
- **MATS_AirQualityConformityDeterminationReport_2050MTP_20230719_DRAFT.pdf** – This is the draft PDF document for the proposed updates to the MATS 2050 AQCD. To facilitate the review process, all relevant changes are listed in **highlighted yellow**. This version reflects minor edits recommended by Dr. Gil Grodzinsky, in his e-mail to MATS MPO staff, dated 7/13/2023.

In accordance with requirements under Federal regulations and the most recent guidance related to the designation of the MATS area as Maintenance area for the 1997 8-hour Ozone air quality standard, MATS hereby states:

- The proposed projects contained in the MATS FY 2024 - 2027 TIP contains one project that is **Non-Exempt** for air quality analysis for Ozone (GDOT PI# 0017121 – Bass Rd. Widening). MATS was found to be conforming with the 1997 NAAQS for Ozone during the original model run (.064 ppm); The latest model run maintains and improves upon that original conformity finding (as per e-mail communication with Georgia Dept. of Environmental Protection - Air Protection Branch on or about 7/13/2023; .058 ppm).
This Non-Exempt project was already known at the time the review was performed for the MATS 2050 MTP, and the associated MATS 2050 AQCD. It therefore does not indicate any previously unidentified source of ozone emissions for the MATS MPO area.
- The proposed plan update meets fiscal constraint requirements of the Metropolitan Transportation Plan, as required under 23 CFR 450.324(11);
- The proposed plan update has been evaluated against the most recent planning assumptions, pursuant to 40 CFR 93.110. Because the latest applicable conformity determination for the MATS region does not identify any required Transportation Control Measures (TCMs), none have been applied in the evaluation of the proposed project update;
- Pursuant to 40 CFR 93.109(c), the proposed plan update does not create the requirement for a regional emissions analysis. MATS latest conformity review with a regional emissions analysis was determined on 5/23/2023 by U.S. EPA, wherein the MPO region was found to be in conformity with applicable National Ambient Air Quality Standards.

Please send any comments or questions to the entire recipient list for this message by **August 21, 2023**. In accordance with the procedures specified under Section 5.3 of the MATS 2050 AQCD currently in place, if MATS does not receive comments from a specific IAC organization by the close of this comment period, MATS will presume there are no objections from that IAC member organization and proceed through the remainder of the adoption process for the FY 2024 – 2027 TIP and amendments to the MATS 2050 AQCD.

Thank you very much for your assistance in this matter.

Yours truly,

Mike Greenwald

Michael J. Greenwald, Ph.D., AICP

MPO Technical Coordinator



Macon Area Transportation Study

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MaconMPO.com

Comments from Georgia EPD - Air Protection Branch on Initial Draft of MATS FY 2024 – 2027 TIP and 2050 Air Quality Conformity Determination Report Amendments

From: [Grodzinsky, Gil](#)
To: [Michael Greenwald](#)
Subject: Suggested edits to TIP update and CDR documentation
Date: Thursday, July 13, 2023 5:06:20 PM

Hi Mike:

Here are some edit recommendations for the TIP and CDR documents:

For TIP:

1. On page 2 of 91 it states “WHEREAS, under 23 CFR, Sec. 450.326 (Code of Federal Regulations Title 23, Section 450.326), the FY 2024 – 2027 Transportation Improvement Program (TIP) is a subset of the 2040 Long Range Transportation Plan projects and activities to be undertaken within the MATS area in the specified four (4) year period; and” Modify “2040 Long Range Transportation Plan” to “2050 Metropolitan Transportation Plan” so it reads “WHEREAS, under 23 CFR, Sec. 450.326 (Code of Federal Regulations Title 23, Section 450.326), the FY 2024 – 2027 Transportation Improvement Program (TIP) is a subset of the 2050 Long Range Transportation Plan projects and activities to be undertaken within the MATS area in the specified four (4) year period; and”
2. On page 2 of 91 it states “WHEREAS, because both Jones County Transit and Macon-Bibb County Transit Authority are recognized by GDOT Office of Intermodal are identified as Tier II transit service providers, and therefore are covered under the Statewide TAM targets published by GDOT.” Typo. Remove “are identified”, can’t have both “are identified” and “are recognized” or it does not read correctly. It looks like “are recognized” was meant to be here and other “are identified” was accidentally left in. So it reads “WHEREAS, because both Jones County Transit and Macon-Bibb County Transit Authority are recognized by GDOT Office of Intermodal as Tier II transit service providers, and therefore are covered under the Statewide TAM targets published by GDOT.”
3. On Page 8 of 91 it states “The purpose of this document is to provide an overview of the Transportation Improvement Program (TIP) and to also present the projects in TIP for fiscal years 2021 - 2024.” Modify “2021 - 2024” to read “2024 - 2027”

For CDR:

1. Page 5 of 12, bottom: It lists the 2017-2019 Design Value of 64ppb. If you go to this website: [Air Quality Design Values | US EPA](#) you will see that the 2020-2022 Design Value is 58 ppb (or 0.058ppm in the units you all use). Would switch out the numbers and DV years with the ones I provided.
2. Page 7 of 12, middle: “The latest full update to the MATS MTP was formally adopted on 3 May 2017, with subsequent amendments to reflect adoption of State of Georgia specific performance measure targets established as part of the Fixing America’s Surface Transportation Act (FAST Act) of 2015, incorporation of electric busses into the Macon Transit Authority fleet, and removal of obsolete road and bridge projects.” Typo. The MTP was adopted on 3 May 2022 so it reads “The latest full update to the MATS MTP was formally adopted on 3 May 2022, with subsequent amendments to reflect adoption of State of Georgia specific performance measure targets established as part of the Fixing America’s Surface Transportation Act (FAST Act) of 2015, incorporation of electric busses into the Macon Transit Authority fleet, and removal of obsolete road and bridge projects.”

3. Page 9 of 12, middle: “This updated Conformity Determination Report was developed by consultation with the Interagency Consultation (IAC) participants via conference calls between November 4, 2021 and December 13, 2021.” The dates listed here need to be updated to 2023 (starting July 2023?)
4. Page 10 of 12, end of Section 5.2: “Finally, since the updated Conformity Determination Report is considered part of the MTP and TIP, this draft was reviewed by IAC members, then circulated for public comment pursuant to the specified in the MATS Public Participation Plan.” Typo? Maybe add “procedures” after “specified” so it reads “Finally, since the updated Conformity Determination Report is considered part of the MTP and TIP, this draft was reviewed by IAC members, then circulated for public comment pursuant to the specified procedures in the MATS Public Participation Plan.”

That’s it for my edits.

Have a good day!

Gil

P.S. Subject to review by IAC but barring any change to the list, I think all are exempt except Bass Road.

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