

REGION V Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin 200 West Adams Street Suite 320 Chicago, IL 60606-5253 312-353-2789 312-886-0351 (fax)

August 05, 2021

Ryan Sorenson Mayor City of Sheboygan 828 Center Avenue, Suite 300 Sheboygan, WI 53081

Re: Federal Transit Administration (FTA) Fiscal Year 2021 Triennial Review – Final Report and Closeout Letter

Dear Mr. Sorenson:

I am pleased to provide you with a copy of this FTA report as required by 49 U.S.C. Chapter 53 and other Federal requirements. The enclosed report documents the FTA's Triennial Review of the City of Sheboygan in Sheboygan, Wisconsin. Although not an audit, the Triennial Review is the FTA's assessment of City of Sheboygan's compliance with Federal requirements, determined by examining a sample of award management and program implementation practices. As such, the Triennial Review is not intended as, nor does it constitute, a comprehensive and final review of compliance with award requirements.

The Triennial Review focused on City of Sheboygan's compliance in 21 areas. No deficiencies were found with the FTA requirements in any of these areas.

Given the delay in completing the FY 2020 reviews until FY 2021 and the significant amount of additional Federal financial support provided through the CARES Act, FTA developed a supplement to the FY 2020 Contractors' Manual to assist in the evaluation of how recipients have used CARES Act and Emergency Relief funding. This supplement details the specific flexibilities and administrative relief provided by FTA for the use of these funds.

As the City of Sheboygan moves forward with its transit program, FTA would like to provide a look-ahead for future oversight activities related to new and/or updated requirements, below.

Public Transportation Agency Safety Plan (PTASP) Regulation

The PTASP regulation requires all operators of public transportation systems that are recipients and subrecipients of FTA's Urbanized Area Formula Grants (Section 5307) to develop safety

plans that include the processes and procedures to implement Safety Management Systems (SMS). FTA has deferred applicability of this requirement for operators that only receive funds through FTA's Enhanced Mobility of Seniors and Individuals with Disabilities Formula Program (Section 5310) and/or Rural Area Formula Program (Section 5311).

As part of the Annual Certifications and Assurances, transit operators must certify they have a safety plan in place for meeting the requirements of the rule by July 20, 2020. However, in response to the COVID-19 public health emergency, on December 11, 2020, FTA issued a Notice of Enforcement Discretion, effectively extending the PTASP compliance deadline to July 21, 2021. All plans will be reviewed starting October 1, 2021 through FTA's oversight process. For guidance and updates to assist in the preparation and implementation of the PTASP Final Rule, please visit FTA's website at www.transit.dot.gov/PTASP.

Random Drug Testing Rate Increase

On October 17, 2018, FTA published a dear colleague letter "2019 Random Drug Testing Increase". In its letter, FTA notified recipients that effective January 1, 2019 and as mandated by its drug and alcohol regulation at 49 C.F.R. 655.45, the random drug testing rate will change. FTA increased the minimum rate of random drug testing from 25 percent to 50 percent of covered employees, for employers subject to FTA's drug and alcohol regulation. This increased random drug testing rate results from an uptick in the proportion of violations identified through random drug testing.

The 50 percent random drug testing rate applies to entities receiving Federal assistance under 49 U.S.C. 5307, 5309, 5311 or 5339, including recipients, subrecipients, and safety-sensitive contractors. The required minimum rate for random alcohol testing is unaffected and remains at 10 percent.

Thank you for your cooperation and assistance during this Triennial Review. Please consider your review to be closed.

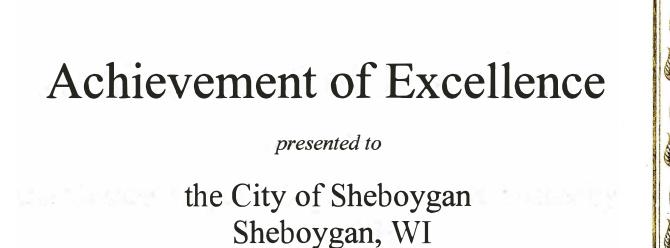
If you need any technical assistance or have any questions, please do not hesitate to contact Mr. Evan Gross, FTA Transportation Program Specialist, at (312) 353-1619 or by email at evan.gross@dot.gov.

Sincerely,

Kelley Brookins

Regional Administrator

Kelly Bookins





Federal Transit Administration Region V

Certificate for exemplary completion of a U.S. DOT FTA
Triennial Review during Fiscal Year 2021 presented to federal-funded
public transportation providers and agencies who had no open
final report findings in the areas examined.

Kelley Brookins, Regional Administrator

FINAL REPORT

FISCAL YEAR 2021 TRIENNIAL REVIEW

of

City of Sheboygan Sheboygan, Wisconsin ID: 2059

Performed for:

U.S. DEPARTMENT OF TRANSPORTATION FEDERAL TRANSIT ADMINISTRATION REGION V

Prepared by:

The DMP Group, LLC

Scoping Meeting / Desk Review Date: March 6, 2020 Virtual Site Visit Date: June 3, 2021 Final Report Date: August 05, 2021

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I. Executive Summary

This report documents the Federal Transit Administration's (FTA) Triennial Review of the City of Sheboygan in Sheboygan, Wisconsin. FTA wants to ensure that awards are administered in accordance with the requirements of Federal public transportation law 49 U.S.C. Chapter 53. The review was performed by The DMP Group, LLC. During the virtual site visit, administrative and statutory requirements were discussed, and documents were reviewed. The Triennial Review focused on the City of Sheboygan's compliance in 21 areas.

As shown below, no deficiencies were found during this Triennial Review.

Desire A	Deficiencies			
Review Area	Code	Description		
1. Legal (L)				
2. Financial Management and Capacity (FM)				
3. Technical Capacity – Award Management (TC-AM)				
4. TC – Program Management and Subrecipient Oversight (TC-PgM)				
5. TC – Project Management (TC-PjM)				
6. Transit Asset Management (TAM)				
7. Satisfactory Continuing Control (SCC)				
8. Maintenance (M)				
9. Procurement (P)				
10. Disadvantaged Business Enterprise (DBE)				
11. Title VI (TVI)				
12. Americans with Disabilities Act (ADA) – General				
13. ADA – Complementary Paratransit (CPT)				
14. Equal Employment Opportunity (EEO) 15. School Bus (SB)				
15. School Dus (SD)				

Daview Asso	Deficiencies			
Review Area	Code	Description		
16. Charter Bus (CB)				
17. Drug-Free Workplace (DFW)				
18. Drug and Alcohol Program (DA)				
19. Section 5307 Program Requirements (5307)				
20. Section 5310 Program Requirements (5310)				
21. Section 5311 Program Requirements (5311)				

II. Review Background and Process

1. Background

The United States Code, Chapter 53 of Title 49 (49 U.S.C. 5307(f) (2)) requires that "At least once every 3 years, the Secretary shall review and evaluate completely the performance of a recipient in carrying out the recipient's program, specifically referring to compliance with statutory and administrative requirements..." This Triennial Review was performed in accordance with FTA procedures (published in FTA Order 9010.1B, April 5, 1993).

The Triennial Review includes a review of the recipient's compliance in 21 areas. The basic requirements for each of these areas are summarized in Section IV.

This report presents the findings from the Triennial Review of the City of Sheboygan. The review concentrated on procedures and practices employed during the past three years; however, coverage was extended to earlier periods as needed to assess the policies in place and the management of award funds. The specific documents reviewed and referenced in this report are available at the FTA's regional office or the City of Sheboygan's office.

2. Process

The Triennial Review process includes a pre-review assessment, a desk review and scoping meeting with the FTA regional office, and a virtual site visit to the recipient's location. The desk review and review scoping meeting were conducted with the Region V Office on March 6, 2020. Necessary files retained by the regional office were sent to the reviewers electronically. A recipient information request was sent to the City of Sheboygan on November 15, 2019, indicating a review would be conducted during FY 2020. In March 2020, all work on Reviews was halted due to the Public Health Emergency. A subsequent recipient information request was sent to the City of Sheboygan on October 16, 2020, advising it that a virtual site visit would be taking place and indicating additional information that would be needed and issues that would be discussed. The virtual site visit to the City of Sheboygan occurred on June 3, 2021.

The virtual site visit portion of the review began with an entrance conference, at which the purpose of the Triennial Review and the review process were discussed. The remaining time was spent discussing administrative and statutory requirements and reviewing documents. In addition, the reviewers evaluated how the City of Sheboygan has used CARES Act and Emergency Relief funding and the impacts of the COVID-19 Public Health Emergency on the agency by discussing a series of questions included in the supplement to the FY 2020 Contractors' Manual. Additional documentation was requested for the Financial Management and Capacity and Procurement areas only. The reviewers examined a sample of maintenance records for FTA-funded vehicles and equipment.

Upon completion of the review, FTA and the reviewers provided a summary of preliminary findings to the City of Sheboygan at an exit conference. Section VI of this report lists the individuals participating in the review.

3. Metrics

The metrics used to evaluate whether a recipient is meeting the requirements for each of the areas reviewed are:

- <u>Not Deficient</u>: An area is considered not deficient if, during the review, nothing came to light that would indicate the requirements within the area reviewed were not met.
- <u>Deficient</u>: An area is considered deficient if any of the requirements within the area reviewed were not met.
- *Not Applicable*: An area can be deemed not applicable if, after an initial assessment, the recipient does not conduct activities for which the requirements of the respective area would be applicable.

III. Recipient Description

1. Organization

Shoreline Metro, a department of the City of Sheboygan, is governed under the authority of the Sheboygan Transit Commission and managed by the Director of Transit & Parking. Shoreline Metro has been in service since 1972 and provides service in the communities of Sheboygan, Sheboygan Falls, and Kohler. Shoreline Metro operates in a small urbanized area, serving a population of 70,000.

Using a fleet of 16 fixed-route vehicles and 10 paratransit vehicles, Shoreline Metro operates a network of 10 fixed routes, complementary paratransit, and school bus tripper service during the school year. Service is offered Monday through Friday from 5:45 a.m. to 8:45 p.m. and Saturdays from 7:45 a.m. to 5:45 p.m. There is no service on Sundays. The basic adult fare for the fixed-route service is \$1.75. Seniors, persons with disabilities, and Medicare cardholders ride for \$0.85. Riders may also purchase daily, 6-pack, and monthly passes. Students of the Sheboygan Area School District ride free with proper identification.

Shoreline Metro's paratransit service, Metro Connection, provides two specialized, demand-response transportation services. The Americans with Disabilities Act (ADA) paratransit service is for persons with disabilities who cannot use the accessible fixed-route bus service. The County Elderly and Disabled Program is for customers living in the Sheboygan urban area and parts of rural Sheboygan County who are over the age of 60 or under the age of 60 with a qualifying disability. Service is offered the same days of the week and times as the fixed-route bus service. The fare is \$3.00 per one-way trip, and personal care attendants can ride free of charge.

Shoreline Metro operates from a single administration and maintenance facility located at 608 South Commerce Street. Shoreline Metro also has a transfer station and customer service office at 828 Pennsylvania Avenue. Both facilities are in the City of Sheboygan.

The City of Sheboygan used its CARES Act funds to pay for ongoing operating expenses and roof replacement of the Shoreline Metro administration facility during the health pandemic.

2. Award and Project Activity

Below is a list of the City of Sheboygan's open awards at the time of the review.

Award Number	Award Amount	Year Executed	Description	
WI-2021-001-00	\$3,497,562	2020	Section 5307 CARES Act Operating and Capital	
WI-2020-037-00	\$1,230,332	2020	Section 5307 Operating Assistance	

Projects Completed

Since its last Triennial Review, the City of Sheboygan has completed the following projects:

- Purchased five new fixed-route, heavy-duty, 35-ft revenue service buses
- Purchased four used fixed-route, heavy-duty service buses from other transit properties using local share revenue

Ongoing Projects

The City of Sheboygan is currently implementing the following noteworthy project:

 Route modifications and improvements as outlined in the 2019/2020 Transportation Development Program

Future Projects

The City of Sheboygan plans to pursue the following noteworthy projects in the next three to five years:

- Purchase 10 fixed-route, heavy-duty, 35-ft revenue service buses and four paratransit revenue service buses
- Complete improvements to the main office facility, including a new roof, using 5339 funding

IV. Results of the Review

1. Legal

<u>Basic Requirement</u>: The recipient must promptly notify the FTA of legal matters, include clauses in its third party and subrecipient agreements, and additionally notify the U.S. DOT Office of Inspector General (OIG) of any instances relating to false claims under the False Claims Act or fraud. Recipients must comply with restrictions on lobbying requirements.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the FTA requirements for Legal.

2. Financial Management and Capacity

<u>Basic Requirement</u>: The recipient must have financial policies and procedures; an organizational structure that defines, assigns and delegates authority; and financial management systems in place to match, manage, and charge only allowable cost to the award. The recipient must conduct required single audits and provide financial oversight of subrecipients.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the FTA requirements for Financial Management and Capacity.

3. Technical Capacity - Award Management

<u>Basic Requirement</u>: The recipient must report progress of projects in awards to the FTA timely.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the FTA requirements for Technical Capacity – Award Management.

4. Technical Capacity - Program Management & Subrecipient Oversight

<u>Basic Requirement</u>: The recipient must follow the public involvement process for transportation plans; develop and submit a State Management/Program Management Plan to the FTA for approval; report in the Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS) on subawards; and ensure subrecipients comply with the terms of the award.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the FTA requirements for Technical Capacity – Program Management & Subrecipient Oversight.

5. Technical Capacity - Project Management

<u>Basic Requirement</u>: The recipient must be able to implement FTA-funded projects in accordance with the award application, FTA Master Agreement, and all applicable laws and regulations, using sound management practices; and prepare force account plans.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the FTA requirements for Technical Capacity – Project Management.

6. Transit Asset Management

<u>Basic Requirement</u>: Recipients must comply with 49 CFR Part 625 to ensure public transportation providers develop and implement transit asset management (TAM) plans.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the FTA requirements for Transit Asset Management.

7. Satisfactory Continuing Control

<u>Basic Requirement</u>: The recipient must ensure that FTA-funded property will remain available to be used for its originally authorized purpose throughout its useful life until disposition.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the FTA requirements for Satisfactory and Continuing Control.

8. Maintenance

<u>Basic Requirement</u>: Recipients must keep federally funded vehicles, equipment, and facilities in good operating condition. Recipients must keep ADA accessibility features on all vehicles, equipment, and facilities in good operating order.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the FTA requirements for Maintenance.

9. Procurement

<u>Basic Requirement</u>: The non-Federal entity must use its own documented procurement procedures which reflect applicable State, local, and tribal laws and regulations, and conform to applicable Federal law and the standards identified in 2 CFR Part 200. State recipients can use the state's overall policies and procedures. When applied to Federal procurements, those policies and procedures must still be compliant with all Federal requirements as applied to non-state recipients. The flexibility afforded by 2 CFR Part 200 should not be misconstrued as absolving a state from Federal requirements. For example, FTA does not require each State DOT to have policies and procedures separate from the state education department.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the FTA requirements for Procurement.

10. Disadvantaged Business Enterprise (DBE)

<u>Basic Requirement</u>: Recipients must comply with 49 CFR Part 26 to ensure nondiscrimination in the award and administration of USDOT-assisted contracts. Recipients also must create a level playing field on which DBEs can compete fairly for USDOT-assisted contracts.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the USDOT requirements for DBE.

11. Title VI

<u>Basic Requirement</u>: The recipient must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance without regard to whether specific projects or services are federally funded. The recipient must ensure that all transit services and related benefits are distributed in an equitable manner.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the FTA requirements for Title VI.

12. Americans with Disabilities Act (ADA) - General

<u>Basic Requirement</u>: Titles II and III of the ADA of 1990 provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility and the provision of service, including complementary paratransit service.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the USDOT requirements for ADA – General.

13. ADA - Complementary Paratransit

<u>Basic Requirement</u>: Under 49 CFR 37.121(a), each public entity operating a fixed-route system shall provide paratransit or other special service to individuals with disabilities that is comparable to the level of service provided to individuals without disabilities who use the fixed-route system. "Comparability" is determined by 49 CFR 37.123-37.133. Requirements for complementary paratransit do not apply to commuter bus, commuter rail, or intercity rail systems.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the USDOT requirements for ADA – Complementary Paratransit.

14. Equal Employment Opportunity

<u>Basic Requirement</u>: The recipient must ensure that no person in the United States shall on the grounds of race, color, religion, national origin, sex, age, or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination in employment under any project, program, or activity receiving Federal financial assistance under the Federal transit laws. (Note: Equal Employment Opportunity Commission's regulation only identifies/recognizes religion and not creed as one of the protected groups.)

<u>Finding</u>: This section only applies to recipients that employ 50 or more transit-related employees and request and meet the federal assistance thresholds of requesting or receiving in excess of \$1 million of operating assistance or \$250,000 of planning assistance in the previous Federal fiscal year; therefore, the related requirements are not applicable to the review of the City of Sheboygan.

15. School Bus

<u>Basic Requirement</u>: Recipients are prohibited from providing school bus service in competition with private school bus operators unless the service qualifies and is approved by the FTA Administrator under an allowable exemption. Federally funded equipment or facilities cannot be used to provide exclusive school bus service.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the FTA requirements for School Bus.

16. Charter Bus

<u>Basic Requirement</u>: Recipients are prohibited from using FTA-funded equipment and facilities to provide charter service if a registered private charter operator expresses interest in providing the service. Recipients are allowed to operate community-based charter services pursuant to certain regulatory exceptions.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the FTA requirements for Charter Bus.

17. Drug-Free Workplace Act

<u>Basic Requirement</u>: Recipients are required to maintain a drug-free workplace for all award-related employees; report any convictions occurring in the workplace timely; and have an ongoing drug-free awareness program.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the FTA requirements for Drug-Free Workplace Act.

18. Drug and Alcohol Program

<u>Basic Requirement</u>: Recipients receiving Section 5307, 5309, 5311, or 5339 funds that have safety-sensitive employees must have a drug and alcohol testing program in place for such employees.

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the FTA requirements for Drug and Alcohol Program.

19. Section 5307 Program Requirements

<u>Basic Requirement</u>: For fixed-route service supported with Section 5307 assistance, fares charged seniors, persons with disabilities or an individual presenting a Medicare card during off-peak hours will not be more than one-half the peak hour fares.

Recipients are expected to have a written, locally developed process for soliciting and considering public comment before raising a fare or carrying out a major transportation service reduction.

Recipients shall develop, publish, afford an opportunity for a public hearing on, and submit for approval, a program of projects (POP).

<u>Finding</u>: During this Triennial Review of the City of Sheboygan, no deficiencies were found with the FTA requirements for Section 5307 Program Requirements.

20. Section 5310 Program Requirements

Basic Requirement: Recipients must expend funds on eligible projects that meet the specific needs of seniors and individuals with disabilities. Projects selected for funding under the Section 5310 program must be included in a locally developed, coordinated public transit-human services transportation plan. Recipients must approve all leases of Section 5310-funded vehicles and ensure that leases include required terms and conditions. Either the recipient or subrecipient must hold title to the leased vehicles.

<u>Finding</u>: This section only applies to recipients that receive Section 5310 funds directly from FTA; therefore, the related requirements are not applicable to the review of the City of Sheboygan.

21. Section 5311 Program Requirements

Basic Requirement: Recipients must expend funds on eligible projects to support rural public

transportation services and intercity bus transportation.

<u>Finding</u>: This section only applies to recipients that receive Section 5311 funds directly from FTA; therefore, the related requirements are not applicable to the review of the City of Sheboygan.

V. Summary of Findings

	Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
1.	Legal	ND				
2.	Financial Management and Capacity	ND				
3.	Technical Capacity – Award Management	ND				
4.	Technical Capacity – Program Management and Subrecipient Oversight	ND				
5.	Technical Capacity – Project Management	ND				
6.	Transit Asset Management	ND				
7.	Satisfactory Continuing Control	ND				
8.	Maintenance	ND				
9.	Procurement	ND				
10.	Disadvantaged Business Enterprise	ND				
11.	Title VI	ND				
12.	Americans with Disabilities Act (ADA) – General	ND				
13.	ADA – Complementary Paratransit	ND				
14.	Equal Employment Opportunity	NA	request and meet the million of operating	plies to recipients that employ 50 or more trefederal assistance thresholds of requesting gassistance or \$250,000 of planning assistant, the related requirements are not applicable Sheboygan.	or receiving in ence in the previous	excess of \$1 ous Federal
15.	School Bus	ND				

	Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
16.	Charter Bus	ND				
17.	Drug-Free Workplace Act	ND				
18.	Drug and Alcohol Program	ND				
19.	Section 5307 Program Requirements	ND				
20.	Section 5310 Program Requirements	NA		pplies to recipients that receive Section 5310 requirements are not applicable to the review		
21.	Section 5311 Program Requirements	NA		pplies to recipients that receive Section 531 requirements are not applicable to the review		

The metrics used to evaluate whether a recipient is meeting the requirements for each of the areas reviewed are: Deficient (D)/Not Deficient (ND)/Not Applicable (NA).

VI. Attendees

Name	Title	Phone Number	E-mail Address				
City of Sheboygan							
Derek Muench	Director of Transit and Parking	920-459-3140	derek.muench@shorelinemetro.com				
Ann Koeller	Administrative Coordinator	920-459-3285	ann.koeller@shorelinemetro.com				
Roland Knorr	Operations Supervisor / Drug & Alcohol Officer	920-459-3281	roland.knorr@shorelinemetro.com				
Jack Sowinski	Safety Manager	920-459-3281	jack.sowinski@shorelinemetro.com				
Todd Wolf	City Administrator	920-459-3317	todd.wolf@sheboyganwi.gov				
Bernie Rammer	Purchasing Agent	920-459-3469	bernard.rammer@sheboyganwi.gov				
Jeff Agee-Aguayo	Transportation Planner with Bay- Lake Regional Planning Commission	920-448-2820	jagee@baylakerpc.org				
Margaret Myers	Transit Coordinator (ADA Coordinator)	920-459-3420	margaret.myers@shorelinemetro.com				
Daniela Tainer- Partipilo	Interim Finance Director	920-459-3304	daniela.tainer- partipilo@sheboyganwi.gov				
Tara Duwe	Deputy Finance Director	920-459-3882	tara.duwe@sheboyganwi.gov				
Kaitlyn Krueger	Finance Director	920-459-3304	kaitlyn.krueger@sheboyganwi.gov				
Bruce Felton	Operations Supervisor	920-459-3281	bruce.felton@sheboyganwi.gov				
Roland Knorr	Operations Supervisor	920-459-3281	roland.knorr@sheboyganwi.gov				
FTA, Region V							
Kelley Brookins	Regional Administrator	312-353-1654	kelley.brookins@dot.gov				
Stewart McKenzie	Acting Director, Financial Management & Program Oversight (exit conference only)	312-353-2866	stewart.mckenzie@dot.gov				
Evan Gross	Transportation Program Specialist	312-353-1619	evan.gross@dot.gov				
Marjorie Hughes	Regional Civil Rights Officer	312-353-4025	marjorie.hughes@dot.gov				
Tony Greep	Community Planner	312-343-1646	tony.greep@dot.gov				
The DMP Group, L.	The DMP Group, LLC						
Dana Lucas	Lead Reviewer	202-726-2630	dana.lucas@thedmpgroup.com				
Jennifer Stewart	Associate Reviewer	202-726-2630	jennifer.stewart@thedmpgroup.com				

VII. Appendices

No appendices are included in this report.