

## **Appendix A**

**Ohio MPO 2026 – 2029 Transportation Improvement Programs  
1997 Ozone Standard “Orphan” Areas  
Conformity Analysis Summary**

**Overview:**

Four Ohio MPOs located within US EPA designated 1997 Ozone Standard “Orphan” Areas are developing new 2026 – 2029 Transportation Improvement Programs (TIP) with two of the MPOs seeking a new conformity determination on their current metropolitan transportation plan (MTP).

As 1997 Ozone Standard “orphan areas”, consistent with US EPA’s November 29, 2018 guidance resulting from the South Coast II Court Case, the MPOs will advance qualitative Transportation Plan and new 2026 – 2029 TIP transportation conformity determinations.

**Affected MPO/Air Quality Areas:**

		<b>New Conformity Determination</b>	
<b>MPO</b>	<b>1997 Ozone Standard Geography</b>	<b>Transportation Plan Update</b>	<b>2026-2029 TIP</b>
Lima / LACRPC	Allen County, OH	No	Yes
Dayton / MVRPC	Clark, Greene, Miami, & Montgomery Co., OH	Yes, on current MTP	Yes
Springfield / SCC-TCC	Clark, Greene, Miami, & Montgomery Co., OH	Yes, on current MTP	Yes
Youngstown / Eastgate	Mahoning & Trumbull Co., OH	No	Yes

**Qualitative Conformity Determination Criteria – 40 CFR 93.109:**

- Latest planning assumptions – Each MPO maintains current travel demand model socio-economic variables and highway/transit networks used to develop the MPOs’ Transportation Plans.
- Latest emission model – Should a future quantitative emission analyses be needed, the MPOs and ODOT will use US EPA’s MOVES4 emissions software

- TCMs – The Ohio SIP does not include any TCMs
- Conformity process schedule
  - Each MPOs will conduct a public review of its 2026 – 2029 TIP and 1997 Ozone Standard “Orphan” area conformity determination information consistent with its adopted Public Involvement Process. The MPO TIP public involvement processes will be coordinated with ODOT’s STIP public involvement period, as recorded below. MPOs seeking a new MTP determination will use the TIP public involvement period as the MTP public involvement period.

MPO	ODOT STIP Public Involvement Period	MPO TIP Public Involvement Period	MPO Policy Board TIP Approval & Conformity Determination Resolution Date
Lima / LACRPC	<b>Mar 11, 2025 – April 11, 2025</b>	03/11/25 – 04/11/25	04/30/25
Dayton / MVRPC		03/13/25 – 04/11/25	05/01/25
Springfield / SCC-TCC		03/24/25 – 04/07/25	05/16/25
Youngstown / Eastgate		03/18/25 – 04/08/25	06/02/25

- MPO Conformity Tests
  - 1997 Standard Ozone “Orphan Area” qualitative conformity determination

**Outcomes:**

- ODOT and the MPOs listed above request Ohio’s Transportation Conformity Interagency Consultation Partners reviewed the information above and provided written concurrence/comments that the documentation herein meets the requirements for advancing **qualitative** 1997 Ozone Standard “Orphan” Area Transportation Plan and 2026 – 2029 TIP conformity determinations.
- Below are the received concurrence correspondences. If correspondence was not received, concurrence was assumed:
  - **Original email initiating IAC by ODOT (01/10/25)**

Hello Ohio Air Quality Interagency Consultation Partners,

ODOT, on the behalf of four of our MPO partners, are initiating transportation conformity interagency consultation for the Ohio 2026 – 2029 S/TIP for four 1997 Ozone Orphan Areas – CCSTCC, Eastgate, LACRPC, and MVRPC with two MPOS (LACRPC and MVRPC) also seeking a new conformity determination on their current metropolitan transportation plan (MTP).

Interagency consultation (IAC) will be accomplished via email streams with the option to hold an online meeting if deemed necessary. Pursuant to the US EPA November 2018 Transportation Conformity Guidance for the South Coast II Court Decision, (<https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P100VQME.pdf>) these four MPOs will be advancing qualitative conformity determinations. Attached is a version of the qualitative conformity determination template that FHWA put out as an example MPOs could utilize.

Also attached is a 2026 – 2029 TIP/MTP conformity summary for the four 1997 Ozone “Orphan” Area MPOs. The conformity summary identifies the MPOs, their respective air quality area geographies, the [40 CFR 93.109](#) conformity criteria, and identifies the S/TIP public involvement periods for ODOT and the public involvement periods for MPOs. Each MPO’s public involvement effort will include information on the region’s air quality conformity determination process.

ODOT and the affected MPOs request interagency consultation email review of the attached 1997 Ozone Orphan Area Conformity Summary. Please respond with questions, comments, or confirmation that four 1997 Ozone Standard MPOs can advance qualitative T-Plan/2026 -2029 TIP and MTP conformity determinations before end of business Friday, January 24<sup>th</sup>.

If concurrence is not given before January 24<sup>th</sup>, it will be assumed that concurrence is given and the four MPOs can each advance with a qualitative conformity determination.

Thank you for your time and have a great weekend,

**Anthony Hill**

Transportation Planner

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**Department of  
Transportation**

○ **FHWA: DJ Johnson (01/15/25)**

Anthony:

FHWA concurs with this approach.

Thank you,  
DJ

Daniel J. Johnson  
Transportation Planner  
Federal Highway Administration  
Ohio Division  
(614)280-6841

○ **U.S. EPA: Neena Nallaballi (01/21/25)**

Good afternoon,

We concur with the qualitative analysis approach adopted by the four MPOs to advance conformity determinations on the 2026-29 TIPs and MTPs.

Thank you

Neena Nallaballi  
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