

Appendix A
Conformity Interagency Consultation

**CCSTCC/MVRPC 2026 Regional Transportation Plan Update
1997 Ozone Standard “Orphan” Areas
Conformity Analysis Summary**

Overview:

The Clark County Springfield Transportation Coordinating Committee (CCSTCC) and the Miami Valley Regional Planning Commission (MVRPC) located within a US EPA designated 1997 Ozone Standard “Orphan” Area are updating their Regional Transportation Plans.

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

Affected MPO/Air Quality Areas:

MPO	1997 Ozone Standard Geography	Transportation Plan Update	SFY 2026-2030 TIP Amendment
Dayton / MVRPC	Clark, Greene, Miami, & Montgomery Cos., OH	x	x
Springfield / CCS-TCC		x	

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. With the 2026 update the 2020 Census results have been incorporated into the socio-economic variables
- 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 for the Dayton/Springfield region does not include any TCMs
- All non-exempt projects in the MVRPC region are included in 2050 LRTP and TIP (if within the TIP years SFY2026-2029). Costs for these projects are included in the fiscal constraint analysis for the respective documents.
- Conformity process schedule:
 - Each MPO will conduct a public review of its Final Draft Regional Transportation Plan and 1997 Ozone Standard “Orphan” area conformity determination information consistent with its adopted Public Participation Policy as recorded below.

MPO	MPO LRTP Public Meeting (Comment Period)	MPO Policy Board LRTP Adoption & Conformity Determination Resolution Date
Dayton / MVRPC	4/8/26 (3/25/26 - 4/23/26)	5/7/26
Springfield / CCSTCC	3/18/26 (3/18/26 – 4/1/26)	5/8/26

- MPO Conformity Tests
 - 1997 Standard Ozone “Orphan Area” qualitative conformity determination
 - MVRPC only, for the portion of the MPO (northern Warren County) that is included in the Cincinnati AQ Region, MVRPC will coordinate with OKI to provide the latest conformity findings (quantitative analysis) for the 2008 and 2015 ozone standards. All northern Warren County projects in the Long Range Transportation Plan and TIP are currently exempt.

Other:

- Expectation that all road diet projects in the Plan and TIP will be determined to be exempt.
- MVRPC will obtain a concurring resolution or letter from OKI for the Cincinnati air quality region.

Outcomes:

- ODOT and the MPOs listed above request Ohio’s Transportation Conformity Interagency Consultation Partners review the information above and provide written concurrence/comments that the documentation herein meets the requirements for advancing **qualitative** 1997 Ozone Standard “Orphan” Area for the 2026 Update of the Regional Transportation Plans conformity determinations by **February 4th, 2026**.

Ramirez, Ana

From: Ramirez, Ana
Sent: Friday, February 6, 2026 2:25 PM
To: 'Nallaballi, Neena'; Johnson, Daniel J (FHWA); ANTHONY.HILL@dot.ohio.gov; Zhuojun.Jiang@dot.ohio.gov; Andy Reser; susan.weber@dot.gov; Kenny, William; angel.lee@dot.ohio.gov; Scott.Schmid@dot.ohio.gov; Scott.Brown@dot.ohio.gov
Cc: Agresta, Louis; Regina Fields; Arnold, Paul
Subject: RE: 2050 Regional Transportation Plan and SFY 2026-2029 TIPs AQ Interagency Consultation
Attachments: MVRPC_CCSTCC_LRTP_Consultation_LRTP26_rev.docx

Good Afternoon,

Please find revised IAC summary document that has been modified to reflect Neena's comment regarding road diet projects.

We appreciate your review and hope you have a great weekend,

Ana

From: Nallaballi, Neena <nallaballi.neena@epa.gov>
Sent: Monday, February 2, 2026 5:08 PM
To: Ramirez, Ana <ARamirez@mvrpc.org>; Johnson, Daniel J (FHWA) <daniel.j.johnson@dot.gov>; ANTHONY.HILL@dot.ohio.gov; Zhuojun.Jiang@dot.ohio.gov; Andy Reser <ARES@oki.org>; susan.weber@dot.gov; Kenny, William <william.kenny@epa.ohio.gov>; angel.lee@dot.ohio.gov; Scott.Schmid@dot.ohio.gov; Scott.Brown@dot.ohio.gov
Cc: Agresta, Louis <lagresta@clarkcountyohio.gov>; Regina Fields <RFIELDS@oki.org>; Arnold, Paul <PArnold@mvrpc.org>
Subject: RE: 2050 Regional Transportation Plan and SFY 2026-2029 TIPs AQ Interagency Consultation

Good afternoon,

Upon review, we recommend revising the current language regarding road diet projects. We would like the language to reflect an expectation that all road diet projects in the Plan and TIP will be determined to be exempt rather than the current phrasing.

Thank you

Neena Nallaballi
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From: Ramirez, Ana <ARamirez@mvrpc.org>
Sent: Tuesday, January 20, 2026 7:41 AM

To: Johnson, Daniel J (FHWA) <daniel.j.johnson@dot.gov>; ANTHONY.HILL@dot.ohio.gov; Zhuojun.Jiang@dot.ohio.gov; Andy Reser <ARESER@oki.org>; susan.weber@dot.gov; Nallaballi, Neena <nallaballi.neena@epa.gov>; Kenny, William <william.kenny@epa.ohio.gov>; angel.lee@dot.ohio.gov; Scott.Schmid@dot.ohio.gov; Scott.Brown@dot.ohio.gov
Cc: Agresta, Louis <lagresta@clarkcountyohio.gov>; Regina Fields <RFIELDS@oki.org>; Arnold, Paul <PArnold@mvrpc.org>
Subject: 2050 Regional Transportation Plan and SFY 2026-2029 TIPS AQ Interagency Consultation

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Good morning,

The Miami Valley Regional Planning Commission (MVRPC), the MPO for the Dayton, Ohio urbanized area and the Clark County-Springfield Transportation Coordinating Committee (CCSTCC), the MPO for the Springfield, Ohio urbanized area are completing their five year Transportation Plan updates.

Attached is the proposed approach and schedule for demonstrating Transportation Plan conformity to the 1997 Ozone standards, the SFY 2026-2029 TIPS will also be amended if needed so that Plans and TIPS are consistent.

Please review this document and respond with comments or concurrence by **Wednesday, February 4, 2026**.

Thank you,

Ana

