

EXHIBIT A – 4

AIR QUALITY CONFORMITY DETERMINATIONS FOR MAINTENANCE AREAS



U.S. Department
of Transportation

Federal Transit Administration
Region V
200 West Adams St., Suite 320
Chicago, IL 60606-5253
312-353-2789
312-886-0351 (fax)

Federal Highway Administration
OH Division
200 North High St., Room 328
Columbus, OH 43215

ELECTRONIC CORRESPONDENCE ONLY

Pamela Boratyn
Director
Ohio Department of Transportation
1980 West Broad Street
Columbus, OH 43223

Dear Director Boratyn:

This is in response to the ODOT letter dated July 1, 2025, regarding the request for USDOT conformity determinations for the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) air quality area. We completed our review of the conformity documentation to support adoption of the OKI 2026-2029 Transportation Improvement Program (TIP) Amendment 1A by resolution on June 12, 2025. Amendment 1A includes the adding of two non-exempt highway projects – ODOT PID 115417 - Implement Smart Lane by installing dynamic message signs and variable speed limit signs on eastbound I-275, and KY 536 - Reconstruct to a 4-lane urban section. The two projects are relying upon previous emissions analysis that was recently conducted as part of OKI's 2026-2029 TIP update. The conformity analysis includes documentation to demonstrate conformity for ozone standards within the Cincinnati air quality area.

Based on our review, in consultation with the United States Environmental Protection Agency (EPA) and through coordination with the Indiana and Kentucky Divisions of FHWA, we find that the OKI 2026-2029 TIP Amendment 1A conforms to the applicable state implementation plan in accordance with the provisions of the EPA's *Transportation Conformity Rule (40 CFR Parts 51 and 93)*.

If you have any questions or comments, please contact Mr. Sam Wallace, Community Transportation Planner, at (614) 280-6839 or samuel.wallace@dot.gov.

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Kelley Brookins
Regional Administrator
Federal Transit Administration

Sincerely,

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LEIGH A
OESTERLING
Date: 2025.08.21
11:29:58 -04'00'

For: David Snyder
Division Administrator
Federal Highway Administration

ecc:

Susan Thomas, ODOT – susan.thomas@dot.ohio.gov
Anthony Hill, ODOT – anthony.hill@dot.ohio.gov
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Anthony Maietta, EPA - maietta.anthony@epa.gov
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U.S. Department
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**Federal Highway
Administration**

Kentucky Division

February 25, 2026

330 West Broadway
Frankfort, KY 40601

PH (502) 223-6720

FAX (502) 223-6735

<http://www.fhwa.dot.gov/kydiv>

In Reply Refer To:
HDA-KY

Mr. Jarrett Haley, Executive Director
Louisville Area Metropolitan Planning Organization
c/o Kentuckiana Regional Planning and Development Agency
11520 Commonwealth Drive
Louisville, KY 40299

Dear Mr. Haley:

The Kentucky Division of the Federal Highway Administration (FHWA) and Region 4 of the Federal Transit Administration (FTA), in consultation with the Indiana Division of the Federal Highway Administration and Regions 4 and 5 of the United States Environmental Protection Agency (EPA), have reviewed the following document(s):

Amendment 11 to the 2050 Metropolitan Transportation Plan (MTP) and
Amendment 2 to the 2025-2028 Transportation Improvement Program (TIP) for the
Louisville Area Metropolitan Planning Organization (MPO)
(MPO approved resolution signed on January 22, 2026)

The Kentucky Environmental and Public Protection Cabinet's Division for Air Quality, the Kentucky Transportation Cabinet's (KYTC) Division of Planning, the KYTC Office of Transportation Delivery, the Louisville Metro Air Pollution Control District, and the Transit Authority of River City also had an opportunity to review and comment on the aforementioned documents.

We found that these documents meet the five primary criteria of the Transportation Conformity Rule (40 CFR Part 93):

- use of the latest planning assumptions;
- use of the latest Air Quality Interagency Consultation (IAC) Committee accepted emissions model for this amendment;
- use of appropriate consultation procedures;
- consistency with the mobile vehicle emission budgets in the State Implementation Plan (SIP); and
- provisions for the timely implementation of transportation control measures in the SIP

We found that these documents met the criteria outlined in the July 1, 2004, Transportation Conformity Rule Amendments for New 8-hr Ozone and PM_{2.5} National Ambient Air Quality Standards (NAAQS), Response to March 1999 Court Decision and Additional Rule Changes (69 FR 40004). We therefore find that these documents conform to the 2015 8-hour Ozone NAAQS.

Should you have any questions or need additional information, please contact Tonya Higdon, Transportation Specialist at (502) 223-6734.

Sincerely,

A handwritten signature in black ink that reads "Shundreka R. Givan". The script is cursive and fluid.

Shundreka R. Givan, AICP
Division Administrator

CC: Aviance Webb, FTA-R4
Ronald Smith, FTA-R4
Erica Tait, FHWA-IN
Steven Jacobs, FHWA-KY
Brad Akers, USEPA-R4
Simone Jarvis, USEPA-R4
Weston Freund, USEPA-R4
Clair Oyler, KEEC-DAQ
Emma Moreo, KEEC-DAQ
Rachael Hamilton, APCD
Aida Copic, TARC
Ron Rigney, KYTC-Program Management
Mikael Pelfrey, KYTC-Planning
Andy Rush, Louisville Area MPO



U.S. Department
of Transportation

Federal Transit Administration
Region III
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Philadelphia, PA 19103
215-656-7100
215-656-7260 (fax)

Federal Highway Administration
WV Division
300 Virginia Street East, Ste. 7400
Charleston, WV, 25301
304-347-5928
304-347-5103 (fax)

July 1, 2025

Mr. Stephen T. Rumbaugh, P.E.
Secretary of Transportation
Commissioner of Highways
West Virginia Department of Transportation
1900 Kanawha Boulevard East
Building Five, Room 110
Charleston, West Virginia 25305-0430

**Re: Air Quality Conformity Determination – KYOVA Interstate Planning Commission
Transportation Improvement Program (TIP) 2026-2029 and 2050 MTP**

Dear Secretary Rumbaugh:

The 1990 Amendments to the Clean Air Act require transportation air quality conformity determinations for Metropolitan Transportation Plans, Transportation Improvement Programs (TIP), sections of a State Transportation Improvement Program (STIP) covering rural nonattainment/maintenance areas, and projects in areas that are designated as air quality nonattainment and maintenance areas. Section 176 (d) of the Clean Air Act establishes priority requirements for programs supported by the Federal government that target nonattainment or maintenance areas to provide for timely implementation of eligible portions of air quality plans.

Based on our review, FTA and FHWA find that the 2026-2029 TIP and 2050 MTP conforms to the applicable State Implementation Plans, and that the conformity determination has been performed in accordance with the requirements specified in the Transportation Conformity Rule (40 CFR Part 93), as amended.

FTA and FHWA find that the KYOVA's 2026-2029 TIP and 2050 MTP was developed based on a continuing, cooperative, and comprehensive transportation planning process by the MPO, Regional Transportation Authority's, and the State of West Virginia, in accordance with the requirements of 23 USC 134 and Section 5303 of the Federal Transit Act (49 USC).

Based on Federal transportation planning regulatory requirements, day-to-day involvement, and extensive review of technical analysis reports, and in accordance with the provisions of Section 134(h)(2)(B), Title 23 USC, FTA and FHWA find the financial information needed to support fiscal constraint determination is complete and the TIP should be effective July 1, 2025.

Mr. Stephen T. Rumbaugh, P.E.

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**Re: Air Quality Conformity Determination – KYOVA Interstate Planning Commission
Transportation Improvement Program (TIP) 2026-2029 and 2050 MTP**

Any questions concerning this approval should be directed to Ms. Kara Greathouse, Planner, FHWA West Virginia Division, at (304) 347-3571, or Ms. Laura Keeley, Transportation Program Specialist, FTA Region III, at (215) 656-7111.

Sincerely,

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THERESA GARCIA
CREWS
Date: 2025.07.01
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Theresa Garcia Crews
Regional Administrator
Region III
Federal Transit Administration

**JOHN HILL
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JR** Digitally signed by
JOHN HILL
ROGERS JR
Date: 2025.07.02
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John Rogers, PhD, P.E.
Acting Division Administrator
West Virginia Division
Federal Highway Administration

cc: Laura Keeley, FTA
Tony Tarone, FTA
Brian Carr, WVDOH Planning Division
Bill Robinson, WVDOT Multimodal Division - Public Transit
Chris Chiles, KYOVA



U.S. Department
of Transportation

November 18, 2025

**Federal Highway Administration
Tennessee Division**

404 BNA Drive, Suite 508
Nashville, Tennessee 37217
Phone (615) 781-5770

**Federal Transit Administration
Region IV**

230 Peachtree St. N.W., Suite 1400
Atlanta, Georgia 30303
Phone (404) 865-5600

Mr. Matt Meservy
Director, Long Range Planning Division
Tennessee Department of Transportation
James K. Polk Building, Suite 900
Nashville, TN 37243

In Reply Refer To:
HDA-TN

Subject: Air Quality Conformity Determination for Clarksville-Hopkinsville, TN-KY

Dear Mr. Meservy:

The Tennessee Division of Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) Region IV Office, in consultation with the Kentucky Division office of Federal Highway Administration and Environmental Protection Agency (EPA) Region IV Office, have reviewed the Transportation Conformity Determination (CDR) for Clarksville Urban Area Metropolitan Planning Organization's (CUAMPO) Fiscal Year (FY) 2026-2029 Transportation Improvement Program (TIP) and 2050 Metropolitan Transportation Plan (MTP) amendments for the bi-state Clarksville-Hopkinsville Tennessee-Kentucky maintenance area. It was approved by the MPO's Transportation Policy Board on October 9, 2025.

The CDR covers the Clarksville-Hopkinsville, TN-KY former maintenance area for the 1997 8-hour ozone National Ambient Air Quality Standards (NAAQS).

Based on our review, we find the conformity determination report (CDR) conforms to the 1997 8-hour Ozone standard, including those outlined in the July 1, 2004, conformity rule revision entitled, "Transportation Conformity Rule Amendments: Conformity Amendments for New 8-hour Ozone and PM2.5 National Ambient Air Quality Standards, Response to March 1999, Court Decision and Additional Rule Changes," (69 FR 40004).

If you have any questions regarding this determination, please contact Sonya Baker, Safety Engineer, at (615) 781-5788.

Sincerely,

YVETTE GARNER
TAYLOR

Digitally signed by YVETTE
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Date: 2025.11.24 16:42:30
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Yvette G. Taylor, PhD
Regional Administrator
FTA Region IV

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Date: 2025.12.05 09:14:39
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Boday Borres, P.E.
Acting Division Administrator
FHWA TN Division

cc: Ms. Jacinda Russell, Field Operations Team Lead, FHWA TN Division
Ms. Sonya Baker, Safety Engineer, FHWA TN Division
Ms. Tonya Higdon, Transportation Specialist, FHWA KY Division
Mr. Robert Sachnin, Community Planner, FTA Region IV
Mr. Andres Ramirez, Community Planner, FTA Region IV
Mr. Ronald Smith, Environmental Protection Specialist, FTA Region IV
Ms. Simone Jarvis, Life Scientist, EPA
Ms. Pamela Boyd-Walker, Planning Manager, TDOT
Mr. Stacy Morrison, Planning Manager, TDOT
Ms. Ann Marie Anway, MPO Team Lead, TDOT
Mr. Marc Corrigan, Environmental Consultant, TDEC
Mayor Wes Golden, MPO Executive Board Chair, Clarksville Urbanized Area MPO
Mr. Michael Ziarnek, Clarksville MPO
Ms. Jill Hall, Clarksville MPO



U.S. Department
of Transportation

Federal Transit Administration Region V 200 West Adams St., Suite 320 Chicago, IL 60606-5253	Federal Highway Administration Indiana Division 575 N. Pennsylvania St., Rm 254 Indianapolis, IN 46204-1576
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June 6, 2025

Roy Nunnally, Director
Technical Planning & Programming Division
Indiana Department of Transportation
100 N Senate Ave. N925
Indianapolis, IN 46204

Dear Mr. Nunnally:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have completed our review of the documents necessary to make an air quality conformity finding for the Evansville Metropolitan Planning Organization's (EMPO) planning documents. The Evansville Metropolitan Planning Area is within the Evansville air quality conformity area comprised of Vanderburg and Warrick Counties. The need for this new conformity finding stems from the adoption of the FY2026-2028 EMPO Transportation Improvement Program (TIP).

Vanderburgh and Warrick Counties are designated as Maintenance for the 1997 Ozone Standard until January 30, 2027.

Appropriate consultation and public involvement on the TIP was completed. The Indiana Department of Environmental Management, the Indiana Department of Transportation, and the US Environmental Protection Agency have completed their reviews and have determined that air quality conformity requirements have been met.

This conformity finding supersedes all previous conformity findings for this MPO. Therefore, FHWA and FTA affirms the following planning documents conform to air quality conformity rule requirements:

Evansville MPO 2050 Metropolitan Transportation Plan
Evansville MPO FY2024-2028 TIP (Original)
Evansville MPO FY2026-2030 TIP (Original)

Please note that the FY2026-2030 TIP is not incorporated into INDOT's current Statewide Transportation Improvement Program (STIP), therefore, the FY2024-2028 TIP is the only TIP officially recognized by FHWA and FTA.

If you have any questions, please feel free to contact Paige Story, FHWA, at 317-226-7476 or paige.story@dot.gov; or Susan Weber, FTA, at 312-353-3888 or susan.weber@dot.gov.

Sincerely,



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CHRISTOPHER J
HALL
Date: 2025.06.10
12:50:32 -05'00'

Christopher J. Hall
Interim Division Administrator
FHWA Indiana Division

cc: (transmitted by e-mail)
Seyed Shokouhzadeh, EMPO
Pamela Drach, EMPO
Paige Story, FHWA-IN
Erica Tait, FHWA-IN
Tonya Higdon, FHWA-KY
Susan Weber, FTA
Tony Greep, FTA
Tony Maietta, EPA
Shawn Seals, IDEM
Jay Mitchell, INDOT