



U.S. Department
of Transportation

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

August 2, 2018

Jerry Wray
Director
Ohio Department of Transportation
1980 West Broad Street
Columbus, OH 43223

Dear Director Wray:

This is in response to your communication dated July 11, 2018 regarding the requests for USDOT conformity determinations for the Youngstown-Warren-Sharon, OH-PA (Eastgate) air quality area. We have completed our review of the conformity documentation to support adoption of the Youngstown-Warren-Sharon, OH-PA (Eastgate) 2040 MTP update, the 2018-2021 TIP and for the new FY 2020-2023 TIP, which will be approved on July 1, 2019, and was approved by resolution on July 30, 2018 by the Eastgate General Policy Board. The conformity documentation includes analyses to demonstrate conformity for the 1997 8-Hour Ozone for the Youngstown-Warren-Sharon, OH-PA area.

Based on our review, in consultation with the United States Environmental Protection Agency (EPA), we find that the Eastgate 2018-2021 TIP and 2040 Metropolitan Transportation Plan update conform to the applicable state implementation plan in accordance with the provisions of the EPA's Transportation Conformity Rule (40 CFR Parts 51 and 93).

The effective date of this determination is the last signature date below.

If you have any questions, please contact Ms. Carmen Stemen, Planning Specialist, at carmen.stemen@dot.gov or 614-680-6848.

Kelley Brookins
Regional Administrator (Acting)
Federal Transit Administration
Date:

Sincerely,

Laura S. Leffler
Division Administrator
Federal Highway Administration
Date:

By messenger (ODOT)

ecc:

Ken Sympson, Eastgate

Dave Moore, ODOT

Natasha Turner, ODOT

Mike Maleski, OEPA

Anthony Maietta, EPA

Stewart McKenzie, FTA

Camille Bonham, FHWA HQ

Jeffrey Blanton, FHWA-OH

Leigh Oesterling, FHWA-OH

Noel Mehlo, FHWA-OH

Internal ecc: DA Reading File



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 02 2018

REPLY TO THE ATTENTION OF

Laura S. Leffler
Division Administrator
Federal Highway Administration - Ohio Division
200 North High Street, Room 328
Columbus, Ohio 43215

Dear Ms. Leffler:

The U.S. Environmental Protection Agency (EPA) has completed its review of the conformity determinations for the 2018-2021 Transportation Improvement Program (TIP), the new FY 2020-2023 TIP, and the 2040 Transportation Plan (Plan) for the Youngstown-Warren-Sharon, OH-PA area. The TIP and Plan were prepared by the Eastgate Regional Council of Governments (Eastgate). This letter provides the results of our review of the conformity determinations.

The purpose of these conformity determinations was to address the recent decision from the United States Court of Appeals for the District of Columbia Circuit decision in South Coast Air Quality Management District v. EPA et al, issued on February 16, 2018. The Youngstown-Warren-Sharon, OH-PA area was designated maintenance for the 1997 8-hour ozone standard. In order to add new non-exempt projects to the TIP and Plan, in light of the court decision, Eastgate would need to demonstrate conformity for the 1997 8-hour ozone standard.

Eastgate used EPA's MOVES2014a model to generate emissions factors (EFs) for the regional analyses. These EFs were developed using the latest local transportation planning assumptions for this area. Emissions were calculated for the years 2018, 2020, 2030, and 2040. The Youngstown-Warren-Sharon, OH-PA area's TIP and Plan demonstrated consistency with all applicable conformity tests for the 1997 8-hour ozone standard.

If you have any questions, feel free to contact Michael Leslie of my staff, at (312) 353-6680.

Sincerely yours,

A handwritten signature in black ink that reads "Pamela Blakley".

Pamela Blakley
Chief
Control Strategies Section

FHWA Checklist for Eastgate 2040 MTP Update Conformity Determination

MPO: Eastgate Regional Council of Governments (Youngstown)	Pollutants: Ozone
Document: 2040 Metropolitan Transportation Plan Update	
Resolution No.: GBD Resolution #013-2018	
Resolution Date: July 30, 2018	
EPA Concurrence letter (date): August 21, 2018	
Other IAC Concurrence letters (dates/specify agency):	

documented? Yes or no	Criteria	Page/ Reference	Comments	Reviewed by
Yes	MPO finding of conformity on MTP (resolution number/date)	p. 191	Whereas Statement #6	CMS
Yes	FHWA/FTA finding of conformity on MTP (date)	p. 191	8/6/2018	CMS
Yes	40 CFR 93.105 (e) - Opportunity for Public Involvement	pp. 163-179	Appendix C: Public Participation Process (PPP)	CMS
Yes	40 CFR 93.108 - Fiscal constraint	pp. 86-98	Financial Analysis	CMS
Yes	40 CFR 93.110 - Latest Planning Assumptions	Appendix D, p. 183		CMS
Yes	40 CFR 93.111 - Latest Emissions Model	Appendix D, p. 181	MOVES2014.1	CMS
Yes	40 CFR 93.112 - Interagency Consultation (meeting minutes, correspondence, etc.)	Appendix D, p. 183		CMS
n/a	40 CFR 93.115(a) - Projects come from the latest conforming Metropolitan Transportation Plan (MTP).	p. 99	2040 Plan Update	CMS
	the TIP project's design concept and scope have not changed significantly from the MTP		2040 Plan Update	CMS
Yes	40 CFR 93.118/119 - Emissions budgets	p. 182, pp. 188-189	See pp. 64-65 - "South Coast vs. EPA" decision - Eastgate a maint. Area for 1997 ozone - NAAQS determination required	CMS
Yes	(b) Analysis years: each budget year, the attainment year, the horizon year, and intermediate years (so no more than 10 years between analysis years)	Appendix D, p. 180	list analysis years: 2018, 2020, 2030, 2040	CMS
Yes	(c) Consistency with the budgets by pollutant (precursor) - emissions are less than or equal to the budget for that year, or the most recent prior year (clearly documented in a tabular format)	Appendix D, p. 182		CMS
n/a	40 CFR 93.122 (g) - Reliance on Previous Emissions Analysis?	n/a	n/a	CMS
Yes	40 CFR 93.122 (g)(1)(ii) - projects are included with the design concept and scope adequate to determine their contribution to the regional emissions	Appendix D, pp. 180 - 192		CMS
n/a	40 CFR 93.122 (g)(1)(iii) - The design concept and scope are not significantly different from that described in previous emissions analysis	n/a	not applicable for plan update	CMS