

TRANSPORTATION CONFORMITY ANALYSIS FOR THE OZONE AND PM_{2.5} AIR QUALITY STANDARDS



EMPO 2035 TRANSPORTATION PLAN
EMPO FY 2008-2011 TRANSPORTATION IMPROVEMENT PROGRAM
INDOT FY 2008-2011 INSTIP



Prepared by
Evansville Metropolitan Planning Organization
1 NW Martin Luther King Jr. Blvd.
Civic Center Room 316
Evansville, IN 47708
(812) 436-7833
evansvillempo.com

1.1 Conformity Finding

The Evansville Metropolitan Planning Organization (EMPO) and Indiana Department of Transportation (INDOT) find that the 2035 Long Range Plan (LRP)(see attachment A for LRP projects list), the Transportation Improvement Program for federal fiscal years 2008 – 2011 (FY 2008- 2011 TIP), and the projects in the PM_{2.5} non-attainment area outside of the Metropolitan Planning Area (MPA) (see attachment B for projects list) conform with the 8- hour ozone and annual fine particulate matter (PM_{2.5}) standards specified by the United States Environmental Protection Agency. Conformity was determined by running the AQ+ program (see attachment) on the EMPO road networks.

This report makes the determination that the 2035 LRP, the FY 2008 – 2011 TIP, and the projects in the PM_{2.5} non-attainment area outside the MPA satisfy all the applicable criteria and procedures in the conformity regulations.

The Transportation Conformity Analysis for the PM_{2.5} and 8-hour ozone National Ambient Air Quality Standards documentation is subject to a public comment period running from September 08, 2009 to September 22, 2009. Upon close of the public comment period the EMPO policy committee will recognize, consider and respond to all comments received.

1.2 Overview of the Conformity Process

On December 9, 1997, the U.S. EPA approved IDEM's request to re-designate Vanderburgh County from a marginal one-hour ozone non-attainment area to a maintenance area.

On April 15, 2004, U.S. EPA designated Vanderburgh and Warrick Counties as a Basic non-attainment area for the new 8-hour ozone standard. Federal regulations also required a Conformity Determination for the Transportation Plan and the TIP be made within 12-months of the designation. On June 15, 2005, the U.S. EPA revoked the 1-hour ozone standard for Vanderburgh County.

On January 30, 2006, the U.S. EPA approved IDEM's request to re-designate Vanderburgh County from a Basic 8-hour ozone non-attainment area to a maintenance area. Indiana's petition includes a long-term maintenance plan that will be implemented to ensure that the area continues to meet the 8-hour standard for ground-level ozone in the future. Indiana also committed to maintain all emission control measures necessary to ensure continued compliance with the standard.

Based on air quality monitoring data gathered between 2002 and 2004, Southwest Indiana (Evansville area) was designated as a non-attainment area for the annual PM_{2.5} National Ambient Air Quality (NAAQS) by the USEPA on April 5, 2005 (70 FR 944). The southwest Indiana PM_{2.5} non-attainment area includes the counties of Vanderburgh and Warrick in the MPO boundary area. The non-attainment area also includes a donut area adjacent to the MPO boundary comprised of Dubois County, the township of

Montgomery in Gibson County, Washington Township in Pike County and Ohio Township in Spencer County.

Figure 1 shows the non-attainment area designated by USEPA for PM_{2.5}. Figure 2 shows the maintenance area designated by USEPA for 8 – hour Ozone.

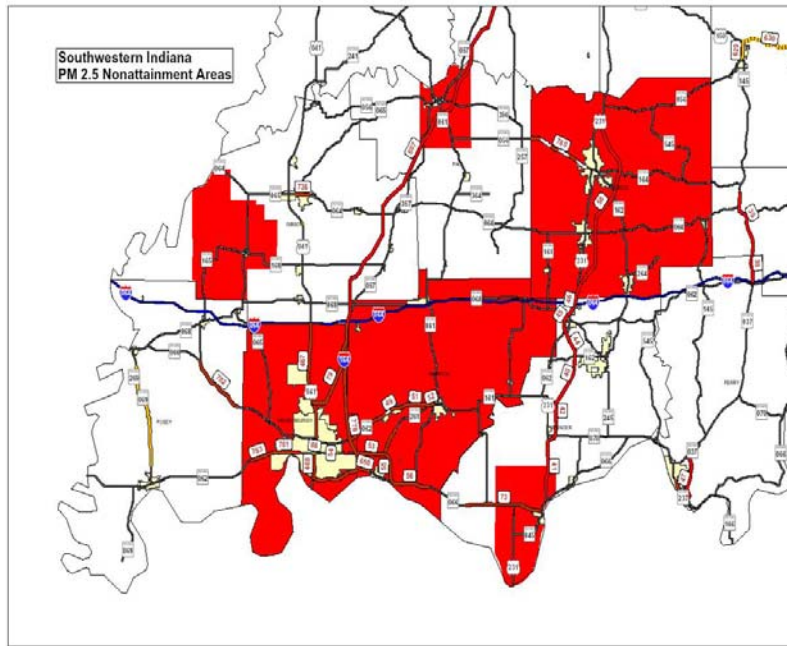


Figure 1: Southwest Indiana Non-Attainment Area for PM_{2.5}

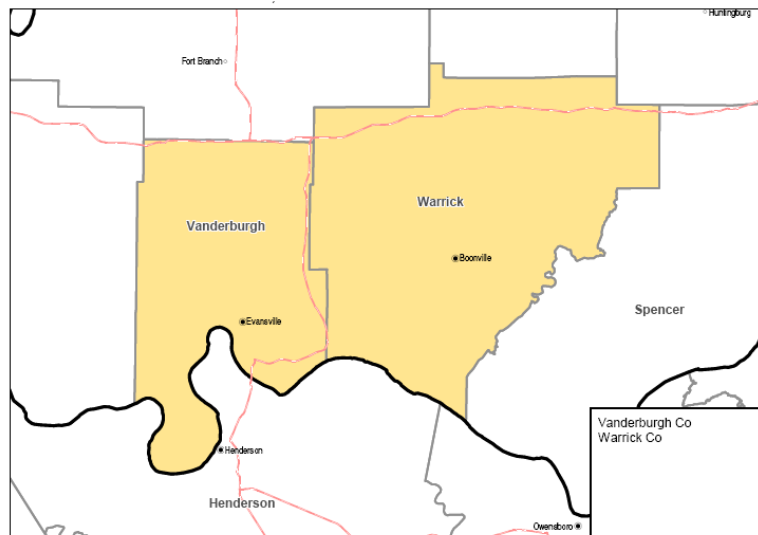


Figure 2: Evansville Region Maintenance Area for 8-hour Ozone

The transportation conformity provisions of the 1990 Clean Air Act (CAA 90) require that the EMPO, as the Metropolitan Planning Organization (MPO) for the southwestern Indiana, make a determination that the region's LRP, TIP and projects conform to

applicable State Implementation Plan (SIP) and that emissions, taken as a whole from the plan, program and projects will not negatively impact the region's ability to meet the NAAQS deadlines. This conformity demonstration also includes all non-exempt projects in the FY 2008 – 2011 in the PM_{2.5} donut area outside of the EMPO Planning Area. Conformity to a SIP means that the region's LRP and TIP will not cause any new violations of the NAAQS, will not cause any worsening of existing violations and will not delay efforts to attain the NAAQS in a timely manner. This demonstration is conducted by comparing estimated motor vehicle emissions resulting from implementation of the 2035 LRP and the FY 2008 – 2011 for specific analysis years to the motor vehicle emissions budget contained in the applicable SIP. The PM_{2.5} interim demonstration is conducted by estimating motor vehicle emissions resulting from implementation of the 2035 LRP, the FY 2008 – 2011, and FY 2008-2011 INSTIP in the PM_{2.5} non-attainment area for specific analysis years are less than 2002 baseline year motor vehicle emissions.

The purpose of this report is to document the process and findings developed by the EMPO and the INDOT as part of the transportation conformity analysis of the EMPO 2035 LRP, the EMPO FY 2008 – 2011, and the INDOT FY 2008-2011 INSTIP (non-exempt projects in PM_{2.5} non-attainment area outside of EMPO MPA).

1.3 Summary of Conformity Process for Ozone

The State Implementation Plan (SIP) has been developed by the Indiana Department of Environmental Management (IDEM). The SIP gives the mobile source emissions budgets for Vanderburgh and Warrick counties for 8-hour ozone. The estimated mobile source emissions for various analysis years after running the AQ+ program are compared with the mobile source emissions budgets from the SIP. If the estimated emissions are less than the mobile source emission budgets then the 2035 LRP and the FY 2008- 2011 TIP are said to conform with the SIP and National Ambient Air Quality Standards.

Vanderburgh and Warrick Counties are designated as an 8-hour ozone maintenance area; hence the estimated mobile source emissions in Vanderburgh and Warrick counties for the years 2015, 2025 and 2035 are compared to the 8 hour budgets.

1.4 Summary of PM_{2.5} Conformity Process

Since a State Implementation Plan (SIP) budget has not been developed for the annual PM_{2.5} standard, an interim test will be used to demonstrate conformity. In this case, the regulations (40 CFR 93.109(i)(2) and 40 CFR 93.119(e)(2)) permit a region to demonstrate conformity either through a "baseline" test, or a "build/no-build" test. In the baseline test, the emissions in the analysis years are compared to a baseline year. To demonstrate conformity, the analysis year emissions must be less than or equal to the baseline emissions.

In the build/no-build test, emissions in the analysis years are compared by estimating emissions under the assumption that all projects in the plan, TIP and INSTIP are built (the "build" scenario) and comparing the result to estimated emissions assuming that

none of the projects in the plan, TIP and INSTIP are built (the “no-build” scenario). Again, the estimated emissions under the build scenario must be less than or equal to the estimated emissions under the no-build scenario.

In consultation with federal and state agencies, the EMPO has determined that the baseline test is the most appropriate for the region.

Unlike the conformity process for ozone, the entire PM_{2.5} non-attainment area, including the donut area, must demonstrate conformity for the federal agencies to accept the determination. This results from the fact that there is one PM_{2.5} non-attainment area, and there must be one conformity demonstration that includes all non-exempt projects in the MPA and PM_{2.5} donut area.

Pursuant to final rules published May 6, 2005 (40 CFR 93.102(b)(2)(iv) and (v) and 93.119(f)(9) and (10)), PM_{2.5} non-attainment areas are required to perform a regional emissions analysis for NO_x as a PM_{2.5} precursor unless the head of the state air agency and the EPA Regional Administrator make a finding that NO_x is not a significant contributor to the PM_{2.5} air quality problem in a given area. Such a finding has not been made for southwest Indiana (Evansville Area), so this conformity analysis includes NO_x as well as direct PM_{2.5} emissions.

Regional emissions analyses under the annual PM_{2.5} standard are not required for VOC, SO_x or ammonia before an adequate or approved SIP budget for such precursors is established, unless the head of the state air agency or EPA Regional Administrator makes a finding that on-road emissions of any of these precursors is a significant contributor. Since such a finding of significance has not been made for the southwest Indiana non-attainment area, these precursors have not been analyzed for this conformity determination.

2.0 Consultation

Interagency consultation is required under the transportation conformity rule, as described in 40 CFR 51.402. The principal forum for the discussion of technical issues relating to conformity procedures is the interagency consultation process. A formal interagency process is required in each non-attainment and maintenance area to establish procedures for consultation between the MPO, FHWA, FTA, U.S. EPA and state and local transportation planning and air quality agencies. A Transportation Air Quality Conformity Protocol executed in 2008 establishes the interagency consultation process for SIP development and conformity determinations between EMPO, INDOT, IDEM, U.S. EPA, FHWA and FTA.

2.1 Summary of Formal Consultation Meetings

During the preparation of the amendment to EMPO 2035 LRP, EMPO FY 2008 – 2011, and INDOT FY 2008-2011 INSTIP and the development of the conformity determination analysis, the consulting agencies communicated on a regular basis. For the conformity analysis, the procedures used and all of the major assumptions were subject to discussion, review, and consensus approval by the consulting agencies.

- A consultation call was held on July 21, 2009. The list below shows the items discussed and agreed to by the participating agencies.
 - After discussions, the participating agencies agreed on the following analysis years for the 2035 Plan:
 - ✓ 2002 – base year
 - ✓ 2010 – near-term year (10 year requirement for PM_{2.5})
 - ✓ 2015 – interim year (attainment year for ozone)
 - ✓ 2025 – interim year
 - ✓ 2035 – horizon year of the transportation plan
 - Ozone components to be analyzed (VOC, NO_x): The participating agencies agreed to the components to be analyzed for determining conformity with the Ozone standards.
 - PM_{2.5} components to be analyzed: The participating agencies agreed on analyzing PM_{2.5} direct and NO_x the same components as the last interim test.
 - PM_{2.5} inventory approach: The participating agencies agreed on a two season single run approach. This is the same approach that was used for the last interim test.
 - Mobile 6.2 input variables: The participating agencies suggested EMPO can use the same variables as they did the last time.
 - Determine interim conformity test for PM_{2.5}: The participating agencies agreed on the Build \leq 2002 Base line year condition to determine conformity.
 - Participating agencies suggested that even though the budget for PM_{2.5} is not yet approved it would be better if the EMPO could include the year 2020 in the analysis so that when the budget is approved the plan and TIP will have already shown the conformity. US-EPA agreed and suggested the EMPO to interpolate the emissions for the year 2020 and include it in the conformity documentation. EMPO agreed.
 - I-69 KY: Participating agencies suggested the EMPO run the conformity analysis with and without the I-69 Bridge so that if the funding is approved then the conformity will have been already determined. EMPO agreed. MPO will include the new I-69 Bridge in the 2035 Network.

PUBLIC NOTICE

RE: Particulate matter that is 2.5 micrometers or smaller in size (PM_{2.5}), and Ozone Conformity Determination for the EMPO 2035 Transportation Plan, the FY 2008-2011 Transportation Improvement Program (TIP), and the INDOT FY 2008 – 2011 INSTIP (projects in the PM_{2.5} donut area).

Non-Attainment area for PM_{2.5} includes Vanderburgh County, Warrick County (MPO Planning Area), Montgomery Township in Gibson County, Dubois County, Washington Township in Pike County and Ohio Township in Spencer County (donut area). Vanderburgh and Warrick are the only counties that are designated as Ozone maintenance areas.

The Evansville Metropolitan Planning Organization (EMPO), the Metropolitan Planning Organization for the Evansville-Henderson urbanized area, and the Indiana Department of Transportation (INDOT) have completed a draft Ozone and PM_{2.5} Conformity Determination for the EMPO 2035 Transportation Plan, the FY 2008 – 2011 Transportation Improvement Program and the INDOT FY 2008 – 2011 INSTIP. The EMPO 2035 Transportation Plan and FY 2008 – 2011 TIP include transportation projects for the City of Evansville, the City of Henderson, the Town of Newburgh, Vanderburgh, Warrick and Henderson Counties. The INDOT FY 2008 – 2011 INSTIP include, transportation projects for the PM_{2.5} donut area. The draft conformity determination demonstrates conformance of the EMPO 2035 Plan, the FY 2008 – 2011 TIP for Vanderburgh and Warrick Counties and the INDOT FY 2008 – 2011 INSTIP for donut area.

A copy of the draft Conformity Determination for the EMPO 2035 Transportation Plan, EMPO FY 2008 – 2011 TIP, and INDOT FY 2008 – 2011 INSTIP will be available for review at the EMPO Office, from September 08, 2009 to September 22, 2009. The draft may also be viewed through the EMPO web page, at <http://www.evansvillempo.com>. A Public Meeting on the draft Conformity Determination will be held at 4:00 PM on October 1, 2009 in Room 303 in the Civic Center Complex, Evansville, IN.

A 15-day public comment period will be in effect from September 08, 2009 until September 22, 2009. Comments may be sent by mail to the address listed below, by email to comments@evansvillempo.com, or by fax to 812-436-7834. All comments must be received by the close of business September 22, 2009.

Bradley G. Mills, Executive Director
Evansville Metropolitan Planning Organization
Room 316 – Civic Center Complex
1 NW M L King Jr. Blvd.
Evansville, IN 47708
(812) 436-7833
<http://www.evansvillempo.com>

3.0 Travel Demand Model for Air Quality Conformity

The air quality conformity analysis was generated using the EMPO regional TransCAD model for Vanderburgh & Warrick Counties and Montgomery Township in Gibson County, and the INDOT Statewide Travel Demand Model was utilized to model the balance of the donut area. The existing EMPO model was developed with the latest demographic data available and was calibrated for the year 2000. The travel model achieved a percent root mean square error of 29 percent in replicating the actual 2000 traffic counts. All forecasts have utilized the best available planning assumptions concerning development and socio-economic forecasts to the year 2035.

A more detailed discussion on the development of the EMPO regional model is provided in the Technical Memorandum: Travel Model Documentation, prepared by BLA in May 2002.

3.1 Model Networks

Traffic modeling for air quality conformity analysis used five separate networks for 2002, 2010, 2015, 2025, and 2035, each with a specific trip table and traffic assignment for the associated analysis years. The milestone years were:

- 2002 - for baseline year test
- 2010 - near-term year
- 2015 - interim year
- 2025 - interim year
- 2035 - horizon year of the transportation plan

These milestone years meet the requirements of Section 93.106(a)(1) of the conformity rule, which requires a conformity determination to cover a time-period of no greater than 10 years. Each model network represents transportation improvement projects that are included in the proposed transportation plan to be open to traffic by January 1 of the various milestone years. All non-exempt transportation projects have been considered in the analysis.

Attachment A contains a complete listing of the specific transportation improvement projects included in each of the model networks for the milestone years. All non-exempt projects planned or programmed in the EMPO 2035 Long Range Transportation Plan, the EMPO FY 2008-2011 TIP, and the INDOT FY 2008-2011 INSTIP were included in the conformity analysis.

3.2 Conformity approach for Ozone

The EMPO TransCAD travel demand model, while updated with the latest planning assumptions and data, does not provide outputs directly suitable for air quality conformity analysis. Thus, it was necessary to post-process the TransCAD model output

to obtain the inputs for the Mobile 6 emissions model. To assist EMPO with the air quality conformity analysis, BLA developed a micro-computer program to interface with and post process the output of the EMPO TransCAD model. A detailed discussion of the program is provided in the Technical Memorandum: Automated Air Quality Conformity Analysis dated September 2003 and AQ+ program developed in 2006. The programmed method for calculating the estimated HPMS vehicle-miles of travel (VMT), the speed data, and the Mobile 6 emission factors presented in the technical memorandum was utilized to complete the conformity analysis for the 2035 Transportation Plan.

3.3 Conformity approach for PM_{2.5}

In contrast to ozone, the annual PM_{2.5} NAAQS for which the southwest Indiana region must demonstrate conformity is based on annual measurements, so the VMT estimates must be annual values. To convert existing daily summer VMT model output to annual VMT, two general inputs “The Equivalent Weekdays per Year” and “The Fraction of Annual VMT for April to September” were used to compute the annual PM_{2.5} emissions. The values are 340 and 0.52, respectively. The Equivalent Weekdays per Year is used to adjust for the fact that the travel demand model predicts weekday volumes and weekend days do not typically contribute as much VMT as weekdays. The value of 340 represents an assumption that weekend days contribute approximately three-quarters as much VMT as a weekday, which is consistent with the limited available data from other regions of the country. If state or local data is collected, or becomes available, it should be used to adjust this value. The Fraction of Annual VMT in April to September (summer) was provided by IDEM. The value 0.52 was derived from HPMS data and INDOT seasonal adjustment factors by functional class. To insure the HPMS data is sound, EMPO on average takes traffic counts at over 300 locations a year, and update the local HPMS locations at least every three years.

Since the emissions inventories are computed by multiplying disaggregate emission rates by the corresponding VMT, total annual VMT is not a natural byproduct of the conformity analysis.

4.0 Conformity Determination for Ozone

Under 8-hour ozone standard, conformity determination is required for adoption, acceptance, or approval of the EMPO 2035 Long Range Transportation Plan and developed pursuant to 23 CFR Part 450 and 49 CFR Part 613. The transportation plan includes a strategy for transportation system investments over a twenty year period. The State Implementation Plan (SIP) includes strategies for progress toward attainment of the National Ambient Air Quality Standards (NAAQS). The conformity determination is based on a regional emissions analysis that demonstrates compatibility between the two planning documents. The regional emissions analysis also includes all regionally significant capacity expansion projects, regardless of the funding sources.

The air quality conformity analysis has shown that the volatile organic compound (VOC) emissions and the nitrogen oxides (NO_x) emissions that result from the implementation of

projects in the EMPO 2035 Transportation Plan are lower than that allowed in the SIP, as defined by the SIP mobile source emission budgets for Vanderburgh and Warrick Counties in the years 2015, 2025 and 2035.

The 2010 analysis year to 2002 baseline year comparison demonstrates a downward trend which supports the finding that there are no factors which would cause or contribute to a new violation or exacerbate an existing violation in the years prior to the 2015 budget year. Therefore, the EMPO 2035 Transportation Plan has been found to conform to the requirements of section 176(c) of the Clean Air Act Amendment and related requirements of the Final Transportation Conformity Rule (40 CFR Part 51 and 40 CFR Part 93) as shown in Table 1 and 2.

Analysis Year	VOC (Volatile Organic Compounds) <i>(Tons / day)</i>	NO_x (Oxides of Nitrogen) <i>(Tons / day)</i>
2002	10.38	17.23
2010	5.60	8.75

Table 1: Interim 2010 Analysis Year Comparison to Baseline Emissions–Vanderburgh and Warrick Counties

8-Hour Ozone Emission Components for Vanderburgh and Warrick Counties				
Analysis Year	VOC (Volatile Organic Compounds)		NO_x (Oxides of Nitrogen)	
	Emissions Budget <i>(Tons / day)</i>	EMPO LRP <i>(Tons / day)</i>	Emissions Budget <i>(Tons / day)</i>	EMPO LRP <i>(Tons / day)</i>
2015	4.20	3.97	5.40	5.29
2025		2.84		2.78
2035		2.96		2.43
2035⁺		2.92		2.44

Table 2: Mobile Source Emissions and SIP Budgets –Vanderburgh and Warrick Counties

+: With I-69 South (KY) and the New Ohio Bridge added to the 2035 Network

The FY 2008-2011 TIP projects are consistent with the 2035 Long Range Transportation Plan. All regionally significant projects are included in the TIP and the design and concept are the same as those identified in the 2035 Plan.

4.1 Conformity Determination for PM_{2.5}

Since a SIP has not been developed for the annual PM_{2.5} standard, the interim process for demonstrating conformity to the standard is a baseline test, in which the emissions in the analysis years are compared to a baseline year – 2002 in this case. The use of this test was decided through the consultation process.

The southwest Indiana region is in non-attainment of the annual PM_{2.5} standard, so the emissions inventory must reflect annual emissions totals. To accomplish this, BLA developed a micro-computer program to interface with and post process the output of the EMPO TransCAD model. A detailed discussion of the program is provided in the Technical Memorandum: Automated Air Quality Conformity Analysis dated September 2003 and Release Notes for EMPO TDM version 3.6 with AQ dated October 2005.

All input and output files from the MOBILE6.2 model processes are provided as attachment C to this document.

4.2 Results of Conformity Determination for PM_{2.5}

The emission results from the conformity analyses for all the non-attainment area for the years 2010, 2015, 2025, 2020 (*interpolated*) and 2035 in Table 4 shows that the direct PM_{2.5} and NO_x emissions from motor vehicles are lower than the 2002 emissions, and conformity for the annual PM_{2.5} standard is demonstrated.

Year	Vanderburgh County		Warrick County		Montgomery Township Gibson County	
	Direct PM _{2.5} (Tons / Yr)	NO _x (Tons / Yr)	Direct PM _{2.5} (Tons / Yr)	NO _x (Tons / Yr)	Direct PM _{2.5} (Tons / Yr)	NO _x (Tons / Yr)
2002	69.19	3850.88	37.47	2076.22	3.24	160.30
2010	37.49	1984.49	18.94	1030.24	1.70	85.78
2015	28.47	1238.85	12.45	584.23	1.22	53.42
2020*	27.02	1000.56	11.33	452.68	1.20	44.99
2025	24.89	681.78	9.75	277.88	1.22	35.50
2035	25.44	607.62	9.80	231.07	.96	23.91
2035 ⁺	25.56	610.62	9.80	231.05	1.00	24.86

Table 3: Mobile Source Emissions Conformity Test for EMPO Modeling Area

Year	Dubois County		Washington Township Pike County		Ohio Township Spencer County	
	Direct PM _{2.5} (Tons / Yr)	NO _x (Tons / Yr)	Direct PM _{2.5} (Tons / Yr)	NO _x (Tons / Yr)	Direct PM _{2.5} (Tons / Yr)	NO _x (Tons / Yr)
2002	26.28	1510.35	3.79	226.24	3.77	214.02
2010	12.36	693.30	1.74	99.68	1.98	117.92
2015	8.86	420.57	2.14	143.71	1.19	62.41
2020*	8.23	330.62	2.04	111.24	1.20	51.70
2025	7.60	240.66	1.95	78.77	1.21	40.98
2035	7.81	219.11	2.23	71.46	1.35	39.34
2035 ⁺	7.82	219.23	2.54	81.51	1.17	34.29

Table 4: Mobile Source Emissions Conformity Test for Donut Area from INDOT

Statewide Travel Demand Model (see attachment D)

Year	Southwest Indiana Non-Attainment Area	
	Direct PM _{2.5} (Tons / Yr)	NO _x (Tons / Yr)
2002	143.74	8038.01
2010	74.21	4011.41
2015	54.33	2503.19
2020*	51.02	1991.79
2025	46.62	1355.57
2035	47.59	1192.51
2035 ⁺	47.89	1201.56

Table 5: Mobile Source Emissions Conformity Test for PM_{2.5} Non-Attainment Area.

⁺: With I-69 South (KY) and the New Ohio Bridge added to the 2035 Network

*: Interpolated

5.0 Conclusion

The conformity analysis conducted by the EMPO and INDOT concludes that the EMPO 2035 Long Range Transportation Plan, the FY 2008-2011 TIP and the INDOT FY 2008 – 2011 INSTIP (projects in the PM_{2.5} donut area) meet all the applicable requirements for the conformity with the Ozone and annual PM_{2.5} standards. The 2035 Long Range Transportation Plan and the FY 2008-2011 TIP are recommended for approval by USDOT.

This conformity analysis for Ozone and PM_{2.5} air quality standards was subject to a public comment period running from September 08, 2009 through September 22, 2009. This report and the accompanying Attachments make the determination that the regions transportation plan and program satisfy all applicable criteria and procedures in the conformity regulations and comply with all applicable implementation plan conformity requirements.



U.S. Department
of Transportation
**Federal Highway
Administration**

Indiana Division

575 North Pennsylvania Street, Room 254
Indianapolis, Indiana 46204

November 30, 2009

In Reply Refer To:
HDA-IN

Mr. Joseph Gustin
Deputy Commissioner of Planning
Office of Commissioner
Indiana Department of Transportation
IGCN 758
100 N. Senate Ave.
Indianapolis, IN 46204

Dear Mr. Gustin:

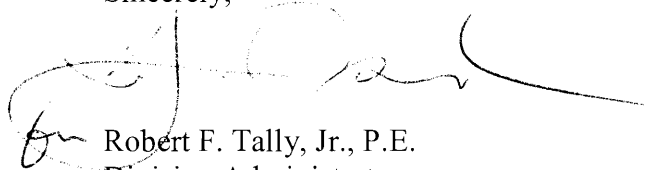
The Federal Transit Administration (FTA) and the Federal Highway Administration (FHWA) have completed our review of the Evansville Metropolitan Planning Organization (EMPO) amendment to the 2035 Transportation Plan (TP) and the 2008-2011 Transportation Improvement Program and their associated conformity analysis adopted by EMPO on October 1, 2009. Our review has concluded that the criteria of the conformity rule have been met. The review was completed based on the July 1, 2004 conformity rule revision, (69 FR 40004). The EMPO certified that the 2035 Transportation Plan and the 2008-2011 Transportation Improvement Program are in conformance with the Vanderburgh/Warrick County 8-hour ozone maintenance area and with the annual PM_{2.5} standard for the Southwest Indiana nonattainment area and has completed the Clean Air Act Amendments (CAAA) requirements as they pertain to the development and conformity of the Transportation Plan.

The Indiana Department of Environmental Management, the Indiana Department of Transportation, Kentucky Transportation Cabinet and the US Environmental Protection Agency have completed their reviews and recommended that we find that the amendment to the 2035 Transportation Plan (TP) and the 2008-2011 Transportation Improvement Program for Evansville, IN, 8-hour ozone maintenance area and the annual PM_{2.5} standard for the Southwest Indiana nonattainment area conforms to the applicable requirements. Appropriate consultation and public involvement on the conformity analyses was completed.



Therefore we find that the fiscal year 2008-2011 Transportation Improvement Program and the amendment to the 2035 Transportation Plan demonstrates conformity for volatile organic compounds and oxides of nitrogen as well as PM_{2.5}. If you have any questions regarding this, please contact Janice Osadczuk at 317 226-7486 or by e-mail at Janice.osadczuk@dot.gov.

Sincerely,



Robert F. Tally, Jr., P.E.
Division Administrator

Cc: transmitted by e-mail
Pat Morris, EPA
John Mooney, EPA
Steve Smith, INDOT
Jay Mitchell, INDOT
Lawrence Brown, INDOT
Pam Drach, INDOT
Emmanuel Nsonwu, INDOT
Gale Ferris, IDEM
Shawn Seals, IDEM
Marisol Simon, FTA
Andy Minyo, FTA
Reginald Arkell, FTA
Craig Luebke, EMPO
Brad Mills, EMPO
Seyed Shokouhzadeh, EMPO
Bernadette Dupont, FHWA
Larry Heil, FHWA
Jay DuMontelle, FHWA
Edward Merryman, KYTC, District 2