

Bel-O-Mar Transportation Study

2045 Long-Range Transportation Plan (LRP)

January 2026

Table of Contents

ACKNOWLEDGEMENTS..... 3

EXECUTIVE SUMMARY 4

1.0 BACKGROUND..... 5

2.0 TRANSPORTATION IMPROVEMENT PROGRAM (TIP)..... 6

3.0 TRANSPORTATION CONFORMITY DETERMINATION: GENERAL PROCESS 6

4.0 REQUIREMENTS 8

CONCLUSION..... 9

APPENDIX10

Acknowledgements

This *Transportation Conformity Report* for the 2045 LRP was prepared by Bel-O-Mar Transportation Study. Individuals from the following agencies were involved with Transportation Conformity Determination Report. They include:

- Anthony Hill (ODOT)
- Susan Thomas (ODOT Planning)
- Samuel Granato (ODOT Modeling)
- Brian Carr (WVDOT Planning)
- William Kenny (OEPA)
- Matt Kemper (WV DEP)
- Gregory Becoat (EPA Region 3 – Mid Atlantic)
- Tony Maietta (EPA Region 5 – Great Lakes, Air Pollutants, Transportation Conformity)
- Neena Nallaballi (EPA Region 5 – Great Lakes)
- Lisa Weisher (OV/EORTA)
- Kara Greathouse (FHWA – WV)
- Samuel Wallace (FHWA – OH]
- Laura Keely (FTA Region 3)
- Scott Warner (ODOT D11 Planning)
- Charles Swart (WVDOT D6 Engineering)
- Erik Hall (WVDOT Public Transit)
- Angel Lee (ODOT Public Transit)
- Mark Kane (FTA Region 5)

Executive Summary

The Bel-O-Mar Regional Council and Interstate Planning Commission's Transportation Study (Belomar), a US EPA designated 1997 Ozone Standard "Orphan" area, completed the transportation conformity process for the 2045 Long Range Plan (LRP). In accordance to US DOT guidance 1997 Ozone Standard "Orphan" area, the conformity determination is based on a qualitative conformity demonstration, following the concurrence of the Belomar Interagency Consultation Committee on Air Quality.

This report documents that the 2045 LRP conformity determination was completed consistent with CAA Section 176(c) requirements, existing associated regulations at 40 CFR Parts 51.390 and 93, and the *South Coast II* decision, according to EPA's *Transportation Conformity Guidance for the South Coast II Court Decision* issued on November 29, 2018.

The Wheeling Metropolitan Area, consisting of Belmont County in Ohio, and Ohio and Marshall Counties in West Virginia, was designated as non-attainment of 1997 National Ambient Air Quality Standards (NAAQS) for Ozone and PM_{2.5} (fine particulate matter). The area was in violation of the 8-hour standard of 0.08 ppm for Ozone. For PM_{2.5}, the non-attainment was for the annual standard only. The PM_{2.5} annual standard is exceeded if the three year average of annual mean concentration of PM_{2.5} is greater than 15 micrograms per cubic meter.

These designations required Transportation Conformity under the Clean Air Act. The purpose is to ensure that the federally supported highway and transit projects/activities are consistent with (conform to) the state air quality implementation plan (SIP). Belomar has made conformity determinations for the Long Range Plans (LRP) and the Transportation Improvement Programs (TIP) prepared after the year 2004.

Effective June, 2007, all three counties in the Belomar region were re-designated as attainment for Ozone. However, transportation conformity determination was still required and made for the LRP and TIP. In April, 2012, EPA designated non-attainment areas based on the 2008 revised standard of 0.075 ppm. Belomar areas were unclassified. In April, 2015, the 1997 Ozone NAAQS were revoked and no further conformity determinations are needed for the 1997 Ozone NAAQS. However, court decision reversed EPA's guidance and required a qualitative conformity determination. It is also noted, based on the current area ambient monitoring, the area is in attainment of 2015 Ozone standard of 0.070 ppm.

On February 16, 2018, the United States Court of Appeals for Washington, D.C. issued a ruling for the previously identified areas in attainment of 1997 Ozone NAAQs designating them as "orphan areas" for the purpose of conformity and requiring Ozone Conformity. Subsequent to the court ruling, emission-based conformity determination of the expiring Transportation Plan for 2040 was done and it was approved on September 6, 2018.

For the PM_{2.5}, the area was re-designated to attainment of the 1997 annual NAAQS in September, 2013. As a part of the attainment ruling, EPA also determined that for the purpose of transportation conformity, emissions from on road mobile sources are insignificant. This finding relieved both states of the obligation to comply with nonattainment-related planning requirements for PM_{2.5} pursuant to Part D of the Clean Air Act. As a result, emissions analysis is not required for PM_{2.5} transportation conformity. However, the conformity process, including interagency consultation and other conformity requirements are still to be satisfied. In addition, a project level hot-spot analysis may be necessary in some cases.

On February 23, 2021, Belomar initiated the interagency consultation process for the conformity of the "Transportation Plan for 2045," also known as the 2045 Long Range Transportation Plan (2045 LRP). The process was initiated via email. The purpose was to seek consensus for a qualitative conformity determination of the new plan as precedent. This process was also followed in January 2025 for the previously agreed upon and followed conformity determination process for the FY2026 - FY2029 TIP. The documentation of the interagency emails is included in Appendix G of the 2045 LRP. The plan conformity determination will be based on qualitative analysis as per interagency consultancy process.

For the Transportation Plan for 2045, Belomar initiated the interagency consultation process and followed the agreed upon process. All capacity adding plan projects have been part of a previous emissions analysis and were conforming projects.

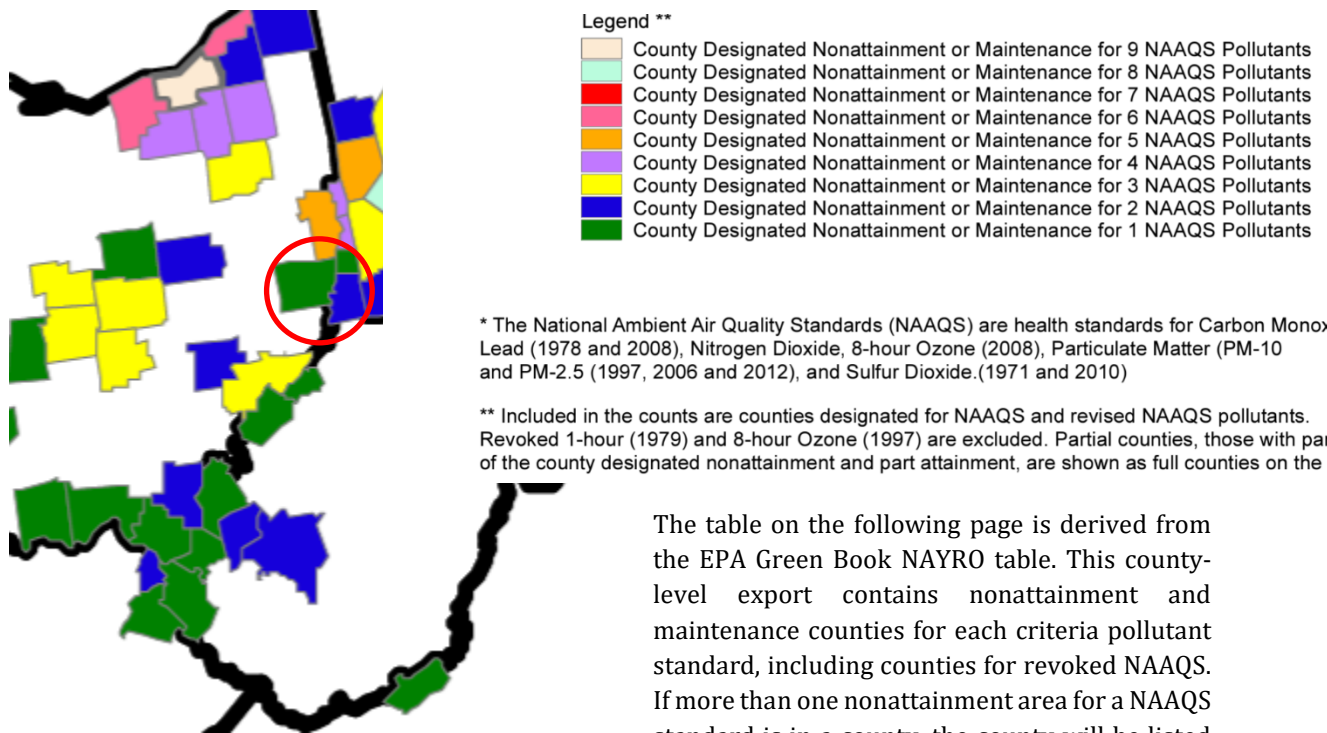
The hot spot analysis requirement is met for Ohio projects through the Ohio PM2.5 hot spot analysis addressed through the NEPA process. For West Virginia projects, no project will involve significant increase in diesel trucks and diesel buses and no project will even approach AADT (Annual Average Daily Traffic) of 125,000. Therefore, the Transportation Plan for 2045 has met the requirements of a PM2.5 qualitative conformity analysis.

1.0 Transportation Conformity Process

Transportation conformity is required under CAA Section 176(c) to ensure that Federally-supported transportation activities are consistent with the purpose of a State implementation plan (SIP) and improve air quality. Conformity is used by Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) for funding and approvals that are given to highway and transit activities that will not cause new air quality violations, worsen existing air quality, or delay timely attainment of the air quality standard or any interim milestone. The source of the map below is the EPA Green Book.

Counties Designated "Nonattainment" or "Maintenance"

for Clean Air Act's National Ambient Air Quality Standards (NAAQS) *



* The National Ambient Air Quality Standards (NAAQS) are health standards for Carbon Monoxide, Lead (1978 and 2008), Nitrogen Dioxide, 8-hour Ozone (2008), Particulate Matter (PM-10 and PM-2.5 (1997, 2006 and 2012), and Sulfur Dioxide.(1971 and 2010)

** Included in the counts are counties designated for NAAQS and revised NAAQS pollutants. Revoked 1-hour (1979) and 8-hour Ozone (1997) are excluded. Partial counties, those with part of the county designated nonattainment and part attainment, are shown as full counties on the map.

The table on the following page is derived from the EPA Green Book NAYRO table. This county-level export contains nonattainment and maintenance counties for each criteria pollutant standard, including counties for revoked NAAQS. If more than one nonattainment area for a NAAQS standard is in a county, the county will be listed

with a row for each nonattainment area. There are no split designations in the Belomar planning area.

2.0 Belomar 2045 Long Range Transportation Plan (2045 LRP)

The 2045 LRP is one part of the MPO's transportation planning and programming process. The LRP contains planned fiscally constrained transportation projects over the next 20-25 years. The projects are projected to be obligated with federal funds in coming Transportation Improvement Program (TIP) years. Projects in the TIP must be consistent with the LRP. The LRP and TIP are subject to public comment and review based on the Belomar Public Participation Plan.

3.0 Transportation Conformity Determination: General Process

Per the court's decision in *South Coast II*, beginning February 16, 2019, a transportation conformity determination for the 1997 ozone NAAQS will be needed in 1997 ozone NAAQS nonattainment and maintenance areas identified by EPA¹ for certain transportation activities, including updated or amended metropolitan MTPs and TIPs. Once US DOT makes its 1997 ozone NAAQS conformity determination, conformity will be required no less frequently than every four years.

Summary of Pollutants and Conformity Determination for Belomar Region

1997 Ozone NAAQS

Belomar (Wheeling, WV-OH) is classified as a revoked area under the 1997 ozone NAAQS, having been redesignated to attainment in 2007. Although the standard has been revoked, a transportation conformity determination for the 1997 ozone NAAQS is still required, per EPA guidance and the *South Coast II* ruling. This determination is performed through a qualitative analysis, as the area is considered an orphan maintenance area under current regulations.

1997 PM2.5 NAAQS

For the PM2.5, the area was re-designated to attainment of the 1997 annual NAAQS in September, 2013. As a part of the attainment ruling, EPA also determined that for the purpose of transportation conformity, emissions from on road mobile sources are insignificant. This finding relieved both states of the obligation to comply with nonattainment-related planning requirements for PM2.5 pursuant to Part D of the Clean Air Act. As a result, emissions analysis is not required for PM2.5 transportation conformity. However, the conformity process, including interagency consultation and other conformity requirements are still to be satisfied. In addition, a project level hot-spot analysis is also potentially required.

2010 Sulfur Dioxide (SO₂) NAAQS

Marshall County, WV, within the Belomar region, was designated nonattainment for the 2010 SO₂ NAAQS but was redesignated to attainment with an approved maintenance plan in 2020. The primary contributor to SO₂ emissions is the Mitchell Power Plant, a point source. Mobile sources contribute minimally to overall SO₂ emissions in the region. Consistent with EPA guidance, transportation conformity determinations for SO₂ rely on qualitative analysis, reflecting the negligible impact of mobile source emissions in the maintenance area. Since the source of pollution has been identified as point-source, no further analysis is required.

¹ The areas identified can be found in EPA's "Transportation Conformity Guidance for the South Coast II Court Decision, EPA-420-B-18-050, available on the web at: www.epa.gov/state-and-local-transportation/policy-and-technical-guidance-state-and-local-transportation .

Summary of Approach

For the Belomar region, transportation conformity determinations for the metropolitan transportation plan (MTP) and transportation improvement program (TIP) involve qualitative analyses for:

- The 1997 ozone NAAQS.
- 1997 PM_{2.5} NAAQS
- 2010 Sulfur Dioxide (SO₂) NAAQS

This approach aligns with EPA guidance and the specific characteristics of each pollutant's contributions within the Belomar area.

4.0 Transportation Conformity Requirements

5.1 Overview

On November 29, 2018, EPA issued Transportation Conformity Guidance for the South Coast II Court Decision² (EPA-420-B-18-050, November 2018) that addresses how transportation conformity determinations can be made in areas that were nonattainment or maintenance for the 1997 ozone NAAQS when the 1997 ozone NAAQS was revoked, but were designated attainment for the 2008 ozone NAAQS in EPA's original designations for this NAAQS (May 21, 2012).

For the 1997 ozone NAAQS areas, transportation conformity for MTPs and TIPs for the 1997 ozone NAAQS can be demonstrated without a regional emissions analysis, per 40 CFR 93.109(c). As no regional emission analysis is required for this conformity determination, there is no requirement to use the latest emissions model, or budget or interim emissions tests.

Therefore, transportation conformity for the 1997 ozone NAAQS for can be demonstrated by showing the remaining requirements:

- Latest planning assumptions (93.110)
- Consultation (93.112)
- Transportation Control Measures (93.113)
- Fiscal constraint (93.108)

5.2 Latest Planning Assumptions

In the 1997 ozone NAAQS areas, the use of latest planning assumptions requirement applies to assumptions about transportation control measures (TCMs) in an approved SIP. The Ohio SIP does not include any TCMs (see Section 5.4). The WV SIP does not include any TCMs.

5.3 Consultation Requirements

The consultation requirements in 40 CFR 93.112 were addressed both for interagency consultation and public consultation. Interagency consultation was conducted, consistent with the Ohio Conformity SIP, with WV SIP, FHWA, FTA, and EPA. Public consultation was conducted consistent with planning rule requirements in 23 CFR 450 and the Belomar Public Participation Plan.

5.4 Timely Implementation of TCMs

The Ohio SIP and WV SIP do not include any TCMs.

5.5 Fiscal Constraint

Transportation conformity requirements in 40 CFR 93.108 state that transportation plans and TIPs must be fiscally constrained consistent with DOT's metropolitan planning regulations at 23 CFR part 450. The Belomar 2045 LRP is fiscally constrained.

Conclusion

The conformity determination process completed for the 2045 LRP that this planning document meet the Clean Air Act and Transportation Conformity rule requirements for the 1997 ozone NAAQS.


Appendix:

A1.0 2045 LRP and conformity determinations:

A2.0 Public Involvement Documents

Pictured: Belomar Facebook Post for AQ Conformity Public Comment

Belomar Regional Council's Post



Belomar Regional Council
Published by Ethan Combs · Just now

Public Notice

The Belomar Regional Council's Transportation Study has conducted interagency consultation on transportation air quality conformity determination for the Long Range Transportation Plan for 2045 for Belmont County, Ohio, and Ohio and Marshall counties, West Virginia, in accordance with the Clean Air Act and applicable federal transportation conformity regulations (40 CFR Part 93).

The 2045 Long Range Transportation Plan identifies federally supported highway and transit projects and programs anticipated through the year 2045 and serves as the region's long-range guide for transportation investment. The previously adopted long-range transportation plan must review its air quality determination a second time in the fourth year since its last air quality conformity determination.

The Belomar region is currently designated attainment for the 1997 PM_{2.5} (fine particulate matter) National Ambient Air Quality Standards (NAAQS). As determined by the U.S. Environmental Protection Agency, emissions from on-road mobile sources are considered insignificant for PM_{2.5}; therefore, a quantitative regional emissions analysis is not required. All other applicable transportation conformity requirements, including interagency consultation and project-level considerations, have been satisfied.

Based on current air quality designations and EPA guidance, the conformity determination for the 2045 Long Range Transportation Plan is based on a qualitative analysis, demonstrating consistency with applicable State Implementation Plans and conformity requirements. All capacity-adding projects included in the plan were previously determined to be conforming through prior emissions analyses or meet qualitative conformity criteria.

Therefore, the Belomar Regional Council is proposing a resolution of adoption for the air quality conformity determination documentation for the 2045 Long Range Transportation Plan. The plan and its proposed air quality conformity determination will be available for public review and comment online at:

<https://belomar.org/.../air-quality-conformity-document.../>

Submit comments by mail or at the office:

Attn: Transportation Planning Director
Bel-O-Mar Transportation Study (Belomar)
105 Bridge Street Plaza, P.O. Box 2086, Wheeling, WV 26003

Comments must be received by February 18th at Noon (12PM).

Comments may also be submitted electronically through the Belomar Open Comments Anchor Web

Belomar Regional Council's Post



its proposed air quality conformity determination will be available for public review and comment online at:

<https://belomar.org/.../air-quality-conformity-document.../>

Submit comments by mail or at the office:

Attn: Transportation Planning Director
Bel-O-Mar Transportation Study (Belomar)
105 Bridge Street Plaza, P.O. Box 2086, Wheeling, WV 26003

Comments must be received by February 18th at Noon (12PM).

Comments may also be submitted electronically through the Belomar Open Comments Anchor Web Page: https://www.belomar.org/open_comments/

Direct web survey link URL:

<https://arcg.is/0CjmGi>



BELOMAR.ORG

Air Quality Conformity Document Preview – The Belomar Regional Council

[See insights and ads](#)

[Boost post](#)



Comment as Belomar Regional Council



Public Notice to be published in Times Leader and Intelligencer

Public Notice

The Belomar Regional Council's Transportation Study has conducted interagency consultation on transportation air quality conformity determination for the Long Range Transportation Plan for 2045 for Belmont County, Ohio, and Ohio and Marshall counties, West Virginia, in accordance with the Clean Air Act and applicable federal transportation conformity regulations (40 CFR Part 93).

The 2045 Long Range Transportation Plan identifies federally supported highway and transit projects and programs anticipated through the year 2045 and serves as the region's long-range guide for transportation investment. The previously adopted long-range transportation plan must review its air quality determination a second time in the fourth year since its last air quality conformity determination.

The Belomar region is currently designated attainment for the 1997 PM_{2.5} (fine particulate matter) National Ambient Air Quality Standards (NAAQS). As determined by the U.S. Environmental Protection Agency, emissions from on-road mobile sources are considered insignificant for PM_{2.5}; therefore, a quantitative regional emissions analysis is not required. All other applicable transportation conformity requirements, including interagency consultation and project-level considerations, have been satisfied.

Based on current air quality designations and EPA guidance, the conformity determination for the 2045 Long Range Transportation Plan is based on a qualitative analysis, demonstrating consistency with applicable State Implementation Plans and conformity requirements. All capacity-adding projects included in the plan were previously determined to be conforming through prior emissions analyses or meet qualitative conformity criteria.

Therefore, the Belomar Regional Council is proposing a resolution of adoption for the air quality conformity determination documentation for the 2045 Long Range Transportation Plan. The plan and its proposed air quality conformity determination will be available for public review and comment online at:

<https://belomar.org/transport/lrp/air-quality-conformity-document-preview/>

Submit comments by mail or at the office:

Attn: Transportation Planning Director
Bel-O-Mar Transportation Study (Belomar)
105 Bridge Street Plaza, P.O. Box 2086, Wheeling, WV 26003

Comments must be received by February 18, 2026 at Noon (12:00 PM). Comments may also be submitted electronically through the Belomar Open Comments Anchor Web Page: https://www.belomar.org/open_comments/

Direct web survey link URL:

<https://arcg.is/0CjmGi>

A3.0 Interagency Consultation Documents



Belomar 2045 LRP IAC on AQ - Action Requested

From Sam Richardson <srichardson@belomar.org>

Date Mon 12/15/2025 12:30 PM

To Becoat, Gregory <becoat.gregory@epa.gov>; Nallaballi, Neena <nallaballi.neena@epa.gov>; Maietta, Anthony <maietta.anthony@epa.gov>; mark.kane@dot.gov <mark.kane@dot.gov>; Angel.Lee@dot.ohio.gov <angel.lee@dot.ohio.gov>; ANTHONY.HILL@dot.ohio.gov <anthony.hill@dot.ohio.gov>; Sam.Granato@dot.ohio.gov <sam.granato@dot.ohio.gov>; Nathaniel Brugler <nathaniel.brugler@dot.ohio.gov>; Natasha.Turner <natasha.turner@dot.ohio.gov>; william.kenny@epa.ohio.gov <william.kenny@epa.ohio.gov>; Sam Wallace <samuel.wallace@dot.gov>; Lisa Weishar <weishar@ovrta.org>; Kara Greathouse <kara.greathouse@dot.gov>; Matt Kemper <matt.a.kemper@wv.gov>; Brian Carr <Brian.E.Carr@wv.gov>; Swart, Charles S <charles.s.swart@wv.gov>; Erik Hall <erik.s.hall@wv.gov>; Laura Keeley <laura.keeley@dot.gov>; Scott Warner <scott.warner@dot.ohio.gov>; Susan.Thomas@dot.ohio.gov <susan.thomas@dot.ohio.gov>

Cc Scott Hicks <hicks@belomar.org>; Ethan Combs <ecombs@belomar.org>; James Benner <jbenner@belomar.org>

1 attachment (824 KB)

Belomar_AQConformPlan_2045LRP.pdf;

Good afternoon Belomar Interagency Consultation on Air Quality Committee,

The transportation conformity needs to be performed every four years on an MPOs TIP and LRTP; 40 CFR 93.104(b)(3). The last transportation conformity determination for Belomar's Long Range Transportation Plan for 2045 was completed on November 19, 2021. The transportation conformity determination has now expired, and Belomar is in a 12-month grace period; 23 CFR 450.324(m). No TIP Amendment can occur unless the project is exempt; 40 CFR 93.126.

The Belomar Regional Council and Interstate Planning Commission's Transportation Study (Belomar) is initiating the transportation conformity interagency consultation for the currently adopted Long Range Transportation Plan for 2045 (2045 LRP). Belomar is designated as a 1997 Ozone standard "Orphan Area". It includes Belmont County in Ohio and Ohio, and Marshall Counties in West Virginia. Pursuant to USEPA November 2018 Transportation Conformity Guidance, we are proposing a Qualitative Conformity Determination. The qualitative conformity determination will be according to the conformity determination criteria as per 40 CFR 93.109 as follows:

- Latest planning assumptions are used for the plan and travel demand model.
- If needed, in the future, a quantitative emissions analysis can be performed using MOVES3 software.
- There are no TCMs in Ohio or West Virginia SIP.
- A public review of the plan and the conformity determination will be conducted as per the adopted Consolidated Public Participation and Civil Rights Compliance Plan (Belomar 3C Plan).

The Belomar Metropolitan Planning Organization requests the interagency consultation for the draft conformity determination via email. The proposed document is attached to this email. **A qualitative**

conformity determination is proposed. The same process was approved and used for the conformity determination of the FY2026-FY2029 TIP in January 2025 and previously for the 2045 LRP in 2021.

Belomar is seeking concurrence or lack thereof within the 30-day window concluding at **noon on January 14, 2026**. Please respond with your concurrence. If no response is received by the close of the 30-day window, concurrence will be assumed.

If further clarification or discussion is requested, Belomar may schedule a web conference call with the committee or individual interagency partners.

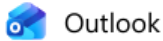
Sincerely,

Samuel Richardson
Transportation Planning Director

Bel-O-Mar Transportation Study
Bridging data and development through planning

📍 105 Bridge Street Plaza ♦ Wheeling, WV ♦ 26003
✉ srichardson@belomar.org
☎ (304) 238-9562
🌐 www.belomar.org





Re: Belomar 2045 LRP IAC on AQ - Action Requested

From Sam Richardson <srichardson@belomar.org>

Date Mon 12/15/2025 12:33 PM

To Becoat, Gregory <becoat.gregory@epa.gov>; Nallaballi, Neena <nallaballi.neena@epa.gov>; Maietta, Anthony <maietta.anthony@epa.gov>; mark.kane@dot.gov <mark.kane@dot.gov>; Angel.Lee@dot.ohio.gov <angel.lee@dot.ohio.gov>; ANTHONY.HILL@dot.ohio.gov <anthony.hill@dot.ohio.gov>; Sam.Granato@dot.ohio.gov <sam.granato@dot.ohio.gov>; Nathaniel Brugler <nathaniel.brugler@dot.ohio.gov>; Natasha.Turner <natasha.turner@dot.ohio.gov>; william.kenny@epa.ohio.gov <william.kenny@epa.ohio.gov>; Sam Wallace <samuel.wallace@dot.gov>; Lisa Weishar <weishar@ovrta.org>; Kara Greathouse <kara.greathouse@dot.gov>; Matt Kemper <matt.a.kemper@wv.gov>; Brian Carr <Brian.E.Carr@wv.gov>; Swart, Charles S <charles.s.swart@wv.gov>; Erik Hall <erik.s.hall@wv.gov>; Laura Keeley <laura.keeley@dot.gov>; Scott Warner <scott.warner@dot.ohio.gov>; Susan.Thomas@dot.ohio.gov <susan.thomas@dot.ohio.gov>

Cc Scott Hicks <hicks@belomar.org>; Ethan Combs <ecombs@belomar.org>; James Benner <jbenner@belomar.org>

1 attachment (20 MB)
transportation-plan-for-2045.pdf;

Additionally, attached is a copy of [transportation-plan-for-2045 1.pdf](#) the 2045 LRP.

Thank you,

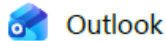
Samuel Richardson
Transportation Planning Director

Bel-O-Mar Transportation Study
Bridging data and development through planning

105 Bridge Street Plaza • Wheeling, WV • 26003
 srichardson@belomar.org
 (304) 238-9562
 www.belomar.org



From: Sam Richardson
Sent: Monday, December 15, 2025 12:29 PM
To: Becoat, Gregory <becoat.gregory@epa.gov>; Nallaballi, Neena <nallaballi.neena@epa.gov>; Maietta, Anthony



Outlook

RE: Belomar 2045 LRP IAC on AQ - Action Requested

From Greathouse, Kara (FHWA) <kara.greathouse@dot.gov>

Date Mon 12/15/2025 12:52 PM

To Sam Richardson <srichardson@belomar.org>; Becoat, Gregory <becoat.gregory@epa.gov>; Nallaballi, Neena <nallaballi.neena@epa.gov>; Maietta, Anthony <maietta.anthony@epa.gov>; Kane, Mark (FTA) <Mark.Kane@dot.gov>; Angel.Lee@dot.ohio.gov <angel.lee@dot.ohio.gov>; ANTHONY.HILL@dot.ohio.gov <anthony.hill@dot.ohio.gov>; Sam.Granato@dot.ohio.gov <sam.granato@dot.ohio.gov>; Nathaniel Brugler <nathaniel.brugler@dot.ohio.gov>; Natasha.Turner <natasha.turner@dot.ohio.gov>; william.kenny@epa.ohio.gov <william.kenny@epa.ohio.gov>; Sam Wallace <samuel.wallace@dot.gov>; Lisa Weishar <weishar@ovrta.org>; Matt Kemper <matt.a.kemper@wv.gov>; Brian Carr <Brian.E.Carr@wv.gov>; Swart, Charles S <charles.s.swart@wv.gov>; Erik Hall <erik.s.hall@wv.gov>; Keeley, Laura (FTA) <laura.keeley@dot.gov>; Scott Warner <scott.warner@dot.ohio.gov>; Susan.Thomas@dot.ohio.gov <susan.thomas@dot.ohio.gov>

Cc Scott Hicks <hicks@belomar.org>; Ethan Combs <ecombs@belomar.org>; James Benner <jbenner@belomar.org>

FHWA – WV concurs

Kara Greathouse
Transportation Community Planner
304-531-4991



Outlook

RE: Belomar 2045 LRP IAC on AQ - Action Requested

From Greathouse, Kara (FHWA) <kara.greathouse@dot.gov>

Date Tue 12/16/2025 7:48 AM

To Sam Richardson <srichardson@belomar.org>; Brian Carr <Brian.E.Carr@wv.gov>

Cc Scott Hicks <hicks@belomar.org>; Ethan Combs <ecombs@belomar.org>; James Benner <jbenner@belomar.org>; Sam Wallace <samuel.wallace@dot.gov>

 2 attachments (418 KB)

WVDOT to FHWA and FTA Requesting Transportation Conformity Determination copy.pdf; KYOVA 2025 TIP Conformity Letter - WVDOT to FHWA.pdf;

Good Morning Sam,

Thank you for taking care of this so quickly. I believe Anthony Hill provided some written guidance to you but I'm including Brian Carr to keep him in the loop.

After Belomar's Board takes action on the LRTP Transportation Conformity Determination you'll request conformity to WVDOT.

WVDOT will request Transportation Conformity, using one of the attached letters as an example. I'll coordinate with EPA Region 3 and FTA Region 3 to conduct the conformity determination and copy the Ohio folks in the final letter.

Please let me know if you have any questions. Thanks,

Kara Greathouse
Transportation Community Planner
304-531-4991



Re: Belomar 2045 LRP IAC on AQ - Action Requested

From Sam Richardson <srichardson@belomar.org>

Date Tue 12/16/2025 12:32 PM

To Kara Greathouse <kara.greathouse@dot.gov>; Brian Carr <Brian.E.Carr@wv.gov>

Cc Scott Hicks <hicks@belomar.org>; Ethan Combs <ecombs@belomar.org>; James Benner <jbenner@belomar.org>; Sam Wallace <samuel.wallace@dot.gov>


Sounds like a plan - thanks for the heads up!


Samuel Richardson
Transportation Planning Director

Bel-O-Mar Transportation Study
Bridging data and development through planning

 105 Bridge Street Plaza ♦ Wheeling, WV ♦ 26003

 srichardson@belomar.org

 (304) 238-9562

 www.belomar.org





RE: Belomar 2045 LRP IAC on AQ - Action Requested

From Wallace, Samuel (FHWA) <samuel.wallace@dot.gov>

Date Tue 12/16/2025 9:57 AM

To Sam Richardson <srichardson@belomar.org>; Becoat, Gregory <becoat.gregory@epa.gov>; Nallaballi, Neena <nallaballi.neena@epa.gov>; Maietta, Anthony <maietta.anthony@epa.gov>; Kane, Mark (FTA) <mark.kane@dot.gov>; Angel.Lee@dot.ohio.gov <angel.lee@dot.ohio.gov>; ANTHONY.HILL@dot.ohio.gov <anthony.hill@dot.ohio.gov>; Sam.Granato@dot.ohio.gov <sam.granato@dot.ohio.gov>; Nathaniel Brugler <nathaniel.brugler@dot.ohio.gov>; Natasha.Turner <natasha.turner@dot.ohio.gov>; william.kenny@epa.ohio.gov <william.kenny@epa.ohio.gov>; Lisa Weishar <weishar@ovrta.org>; Kara Greathouse <kara.greathouse@dot.gov>; Matt Kemper <matt.a.kemper@wv.gov>; Brian Carr <Brian.E.Carr@wv.gov>; Swart, Charles S <charles.s.swart@wv.gov>; Erik Hall <erik.s.hall@wv.gov>; Keeley, Laura (FTA) <laura.keeley@dot.gov>; Scott Warner <scott.warner@dot.ohio.gov>; Susan.Thomas@dot.ohio.gov <susan.thomas@dot.ohio.gov>

Cc Scott Hicks <hicks@belomar.org>; Ethan Combs <ecombs@belomar.org>; James Benner <jbenner@belomar.org>

Hi Sam,

Thank you for the IAC communication. Per the request, FHWA-OH concurs.

Best Regards,
Sam



Sam Wallace
U.S. DOT | FHWA Ohio Division
Community Transportation Planner
200 North High St, Room 328
Columbus, OH 43215
(614) 280-6839
Samuel.Wallace@dot.gov
<https://www.fhwa.dot.gov/ohdiv/>



Outlook

RE: Belomar 2045 LRP IAC on AQ - Action Requested

From Nallaballi, Neena <nallaballi.neena@epa.gov>

Date Thu 12/18/2025 11:12 AM

To Sam Richardson <srichardson@belomar.org>; Becoat, Gregory <becoat.gregory@epa.gov>; Maietta, Anthony <maietta.anthony@epa.gov>; mark.kane@dot.gov <mark.kane@dot.gov>; angel.lee@dot.ohio.gov <angel.lee@dot.ohio.gov>; anthony.hill@dot.ohio.gov <anthony.hill@dot.ohio.gov>; sam.granato@dot.ohio.gov <sam.granato@dot.ohio.gov>; Nathaniel Brugler <nathaniel.brugler@dot.ohio.gov>; Natasha.Turner <natasha.turner@dot.ohio.gov>; Kenny, William <william.kenny@epa.ohio.gov>; Sam Wallace <samuel.wallace@dot.gov>; Lisa Weishar <weishar@ovrta.org>; Kara Greathouse <kara.greathouse@dot.gov>; Matt Kemper <matt.a.kemper@wv.gov>; Brian Carr <Brian.E.Carr@wv.gov>; Swart, Charles S <charles.s.swart@wv.gov>; Erik Hall <erik.s.hall@wv.gov>; Laura Keeley <laura.keeley@dot.gov>; Scott Warner <scott.warner@dot.ohio.gov>; susan.thomas@dot.ohio.gov <susan.thomas@dot.ohio.gov>

Cc Scott Hicks <hicks@belomar.org>; Ethan Combs <ecombs@belomar.org>; James Benner <jbenner@belomar.org>

Good morning,

EPA R5 concurs.

Thank you

Neena Nallaballi
Control Strategies Section
EPA Region-5
Nallaballi.Neena@epa.gov
312-353-1770



RE: Belomar 2045 LRP IAC on AQ - Action Requested

From Lisa Weishar <weishar@ovrta.org>

Date Tue 12/23/2025 11:02 AM

To Sam Richardson <srichardson@belomar.org>; 'Becoat, Gregory' <becoat.gregory@epa.gov>; 'Nallaballi, Neena' <nallaballi.neena@epa.gov>; 'Maietta, Anthony' <maietta.anthony@epa.gov>; mark.kane@dot.gov <mark.kane@dot.gov>; angel.lee@dot.ohio.gov <angel.lee@dot.ohio.gov>; anthony.hill@dot.ohio.gov <anthony.hill@dot.ohio.gov>; sam.granato@dot.ohio.gov <sam.granato@dot.ohio.gov>; 'Nathaniel Brugler' <nathaniel.brugler@dot.ohio.gov>; 'Natasha.Turner' <natasha.turner@dot.ohio.gov>; william.kenny@epa.ohio.gov <william.kenny@epa.ohio.gov>; Sam Wallace <samuel.wallace@dot.gov>; Kara Greathouse <kara.greathouse@dot.gov>; 'Matt Kemper' <matt.a.kemper@wv.gov>; Brian Carr <Brian.E.Carr@wv.gov>; 'Swart, Charles S' <charles.s.swart@wv.gov>; 'Erik Hall' <erik.s.hall@wv.gov>; 'Laura Keeley' <laura.keeley@dot.gov>; 'Scott Warner' <scott.warner@dot.ohio.gov>; susan.thomas@dot.ohio.gov <susan.thomas@dot.ohio.gov>

Cc Scott Hicks <hicks@belomar.org>; Ethan Combs <ecombs@belomar.org>; James Benner <jbenner@belomar.org>

Sam,

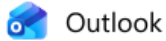
OVRTA concurs.

Lisa

Melissa (Lisa) M. Weishar
Executive/Finance Director



21 South Huron Street
Wheeling, WV 26003
304-232-2190
weishar@ovrta.org



Re: Belomar 2045 LRP IAC on AQ - Action Requested

From Sam Richardson <srichardson@belomar.org>

Date Fri 1/23/2026 9:54 AM

To Lisa Weishar <weishar@ovrta.org>; 'Becoat, Gregory' <becoat.gregory@epa.gov>; 'Nallaballi, Neena' <nallaballi.neena@epa.gov>; 'Maietta, Anthony' <maietta.anthony@epa.gov>; mark.kane@dot.gov <mark.kane@dot.gov>; Angel.Lee@dot.ohio.gov <angel.lee@dot.ohio.gov>; ANTHONY.HILL@dot.ohio.gov <anthony.hill@dot.ohio.gov>; Sam.Granato@dot.ohio.gov <sam.granato@dot.ohio.gov>; 'Nathaniel Brugler' <nathaniel.brugler@dot.ohio.gov>; 'Natasha.Turner' <natasha.turner@dot.ohio.gov>; william.kenny@epa.ohio.gov <william.kenny@epa.ohio.gov>; Sam Wallace <samuel.wallace@dot.gov>; Kara Greathouse <kara.greathouse@dot.gov>; 'Matt Kemper' <matt.a.kemper@wv.gov>; Brian Carr <Brian.E.Carr@wv.gov>; 'Swart, Charles S' <charles.s.swart@wv.gov>; 'Erik Hall' <erik.s.hall@wv.gov>; 'Laura Keeley' <laura.keeley@dot.gov>; 'Scott Warner' <scott.warner@dot.ohio.gov>; Susan.Thomas@dot.ohio.gov <susan.thomas@dot.ohio.gov>

Cc Scott Hicks <hicks@belomar.org>; Ethan Combs <ecombs@belomar.org>; James Benner <jbenner@belomar.org>

Good morning,

Pending no further comments, I will officially close the Belomar Interagency Consultation on Air Quality and launch our public involvement phase in preparation for our February 18th Technical Advisory Committee meeting and February 19th Policy Committee meeting. Stay tuned for more follow-up material.

Thank you for your attention to this matter,

Samuel Richardson
Transportation Planning Director

Bel-O-Mar Transportation Study
Bridging data and development through planning

- 105 Bridge Street Plaza • Wheeling, WV • 26003
- srichardson@belomar.org
- (304) 238-9562
- www.belomar.org



A4.0 Resolution

**RESOLUTION OF THE
BEL-O-MAR REGIONAL COUNCIL AND INTERSTATE PLANNING COMMISSION
(BELOMAR) POLICY COMMITTEE
ADOPTING THE AIR QUALITY CONFORMITY DETERMINATION
FOR THE 2045 LONG RANGE TRANSPORTATION PLAN**

WHEREAS, the Bel-O-Mar Regional Council and Interstate Planning Commission (Belomar) is the designated Metropolitan Planning Organization (MPO) for the Wheeling Metropolitan Planning Area, including Belmont County, Ohio, and Ohio and Marshall counties, West Virginia; and

WHEREAS, Belomar is responsible for preparing and maintaining a Long Range Transportation Plan and ensuring compliance with the Clean Air Act and applicable federal transportation conformity regulations (40 CFR Part 93); and

WHEREAS, Belomar has completed interagency consultation and a qualitative transportation air quality conformity analysis for the Transportation Plan for 2045, consistent with current air quality designations and U.S. Environmental Protection Agency guidance; and

WHEREAS, the Belomar region is designated attainment for the 1997 PM_{2.5} National Ambient Air Quality Standards (NAAQS), and emissions from on-road mobile sources are considered insignificant, eliminating the requirement for a quantitative regional emissions analysis; and

WHEREAS, public notice and opportunity for review and comment on the air quality conformity determination for the 2045 Long Range Transportation Plan were provided in accordance with the Belomar Public Participation Plan;

NOW, THEREFORE, BE IT RESOLVED, that Belomar hereby adopts the determination that the Long Range Transportation Plan for 2045 will not significantly adversely impact air quality in the region, finding the plan to be in conformity with the Clean Air Act and applicable federal transportation conformity regulations.

Adopted on this 19th day of February 2026

ATTEST:

Scott Hicks, Executive Director
Bel-O-Mar Regional Council

Lisa Heasley, Chairwoman
Bel-O-Mar Regional Council and Interstate
Planning Commission Policy Committee