Transportation Conformity Determination Report

Central Indiana

Boone, Hamilton, Hancock, Hendricks,
Johnson, Madison, Marion, Morgan, and Shelby Counties

– Indianapolis Metropolitan Planning Organization –
– Indiana Department of Transportation –

2026-Q3 | August 19, 2026

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1. Overview

As part of its transportation planning process, the Indianapolis Metropolitan Planning Organization (IMPO) completed the transportation conformity process for the Metropolitan Transportation Plans (MTPs) and Transportation Improvement Programs (TIPs) for the 9-county Central Indiana 1997 NAAQS region. This report documents that the following MTPs and TIPs meet the federal transportation conformity requirements in 40 CFR Part 93.

- Indianapolis Metropolitan Planning Organization (indympo.gov)
  - CIRCLE 2050 MTP (Up to and including 2026Q3 Amendment)
  - 2024-2027 IRTIP (MiTIP) (Up to and including 2026Q3 Amendment)
  - 2026-2029 IRTIP (IMPO Approved December 2025)
- Madison County Council of Governments (mccog.net)
  - 2050 In Motion MTP (Adopted August 2026)
  - 2026-2030 TIP (Current through August 2026)
  - In 2023 (most recently) the Indianapolis MPO (IMPO), Madison County Council of Governments (MCCOG), and the Columbus Area MPO (CAMPO) signed a Memorandum of agreement to establish policies for overlapping or adjacent areas. Per that agreement, "The IMPO and MCCOG will complete separate Transportation Conformity Determination Reports for the 1997 Ozone NAAQS."
- Columbus Area Metropolitan Planning Organization
  - In 2023 (most recently) the Indianapolis MPO (IMPO), Madison County Council of Governments (MCCOG), and the Columbus Area MPO (CAMPO) signed a Memorandum of agreement to establish policies for overlapping or adjacent areas. Per that agreement, "CAMPO and the IMPO agree that any portions of the Columbus UA-Census that are located in Johnson and Shelby Counties will continue to be included in the IMPO MPA for air quality monitoring purposes"

2. Background

MPOs work closely with their local public agencies (cities, towns, and counties), as well as the Indiana Department of Transportation (INDOT), local transit operators, fellow MPOs, and other relevant agencies in creating their MTPs. As projects are selected for federal funding they advance to implementation, at which point they are programmed into MPOs' 4-year TIPs for study, design, and construction, provided they attain environmental permits and other necessary clearances.

3. Current Air Quality Status

Clean Air Act (CAA) section 176(c) (42 U.S.C. 7506(c)) requires that federally funded or approved highway and transit activities are consistent with ("conform to") the purpose of the State Implementation Plan (SIP). Conformity to the purpose of the SIP means that transportation activities will not cause or contribute to new air quality violations, worsen existing violations, or delay timely attainment of the relevant NAAQS or any interim milestones. 42 U.S.C. 7506(c)(1). The United States Environmental Protection Agency's (EPA's) transportation conformity rules establish the criteria and procedures for determining whether metropolitan transportation plans, transportation improvement programs (TIPs), and federally supported highway and transit projects conform to the SIP. 40 CFR Parts 51.390 and 93.

On February 16, 2018, the United States Court of Appeals for the District of Columbia Circuit in South Coast Air Quality Mgmt. District v. EPA ("South Coast II," 882 F.3d 1138) held that transportation conformity determinations must be made in areas that were either nonattainment or maintenance for the 1997 ozone national ambient air quality standard (NAAQS) and attainment for the 2008 ozone NAAQS when the 1997 ozone NAAQS was revoked. These conformity determinations are required in these areas after February 16, 2019. The 9-county Central Indiana conformity area[1] was nonattainment at the time of the 1997 ozone NAAQS revocation on April 6, 2015 and was also designated attainment for the 2008 ozone NAAQS on May 21, 2012 and as attainment for the 2015 ozone NAAQS. Therefore, per the South Coast II decision, this conformity determination is being made for the 1997 ozone NAAQS on the 9-County Central Indiana conformity area LRTPs/MTPs and TIPs.

This conformity determination was completed consistent with CAA 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.

[1] The 9-County Central Indiana conformity area includes Boone, Hamilton, Madison, Hendricks, Marion, Hancock, Morgan, Johnson, and Shelby counties.

4. Transportation Conformity Requirements

On November 29, 2018, EPA issued **Transportation Conformity Guidance for the South Coast II Court Decision**[2] (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).

The transportation conformity regulation at 40 CFR 93.109 sets forth the criteria and procedures for determining conformity. The conformity criteria for LRTPs/MTPs and TIPs include: latest planning assumptions (93.110), latest emissions model (93.111), consultation (93.112), transportation control measures (93.113(b) and (c), and emissions budget and/or interim emissions (93.118 and/or 93.119). For the 1997 ozone NAAQS areas, transportation conformity for LRTPs/MTPs and TIPs for the 1997 ozone NAAQS can be demonstrated without a regional emissions analysis, per 40 CFR 93.109(c). This provision states that the regional emissions analysis requirement applies one year after the effective date of EPA's nonattainment designation for a NAAQS and until the effective date of revocation of such NAAQS for an area. The 1997 ozone NAAQS revocation was effective on April 6, 2015, and the South Coast II court upheld the revocation. 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 9-County Central Indiana conformity area can be demonstrated by showing the remaining requirements in Table 1 in 40 CFR 93.109 have been met. These requirements, which are laid out in Section 2.4 of EPA's guidance and addressed below, include:

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

5. Latest Planning Assumptions

The use of latest planning assumptions in 40 CFR 93.110 of the conformity rule generally apply to regional emissions analysis. 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 Indiana SIP does not include any TCMs for the 9-county Central Indiana ozone area, see also Section 7.

[2] Available from https://www.epa.gov/sites/production/files/2018-11/documents/420b18050.pdf

6. Consultation

The consultation requirements in 40 CFR 93.112 were addressed both for interagency consultation and public consultation. Interagency consultation was conducted consistent with the Indiana Conformity SIP and including the following agencies: FHWA, FTA, IDEM, EPA, INDOT, IndyGo, CIRTA, City of Anderson Transit System (CATS), Indianapolis DPW, Indianapolis MPO (IMPO), Madison County Council of Governments (MCCOG), and Columbus Area MPO (CAMPO). In addition, the following environmental agencies were included: IDNR/SHPO, USACE, USFW, Purdue Institute for a Sustainable Future, IU Environmental Resiliency Institute, IUPUI Transportation and Autonomous Systems Institute, Keep Indianapolis Beautiful, White River Alliance, county and municipal public health departments, Indianapolis Cultural Trail / Pacers Bikeshare, Indiana Farm Bureau Policy Team, Health by Design, IUPUI Public Policy Institute, Indianapolis Historic Preservation Commission, and Drive Clean.

On January 16, 2019, as part of a previous LRTP/MTP amendment, an email was sent to ICG members stating that there are no TCMs in the Indiana SIP for the 9-county Central Indiana ozone area.

MTP Conformity
The interagency consultation group (ICG) members received an email on July 20, 2026, which included a proposed Amendment #4 to the CIRCLE 2050 MTP and a projected timeline for the approval process. Recipients were asked to provide questions and comments by July 27, 2026.

Public consultation was conducted consistent with planning rule requirements in 23 CFR 450. The CIRCLE 2050 MTP Amendment #4 draft and 2026-Q3 Transportation Conformity Determination Report were made available for public review and comment from August 8-17, 2026. A public hearing for these documents was held on August 19, 2026, at the Indianapolis MPO Transportation Policy Committee Meeting. A summary of comments can be found in Appendix A.

TIP Conformity
The interagency consultation group (ICG) received an email July 20, 2026, which included proposed updated and amendments to the IMPO's IRTIP and a projected timeline for the amendment process. The ICG were asked to provide questions, comments, or their concurrence by July 27, 2026.

Public consultation was conducted consistent with planning rule requirements in 23 CFR 450. Proposed 2026Q3 TIP Amendments to the 2026-2029 IRTIP and the 2026-Q3 Transportation Conformity Determination Report was made available for public review and comment from August 8-17, 2026.

A public hearing for these documents was held on August 19, 2026, at the Indianapolis MPO Transportation Policy Committee Meeting. A summary of comments can be found in Appendix A.

7. Transportation Control Measures

The Indiana SIP has no Transportation Control Measures (TCMs) for the 9-county Central Indiana ozone area.

8. 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. This amendment meets reasonable fiscal constraint requirements.

This conformity update includes the following Non-Exempt projects, none of which will be amended into the IMPO 2050 MTP because they are outside of the Metropolitan Planning Area. The IMPO coordinated with MCCOG and CAMPO as appropriate.

- *Updated:* **MTP #5012; DES #2200013; INDOT (in Johnson County)**
  - I-65 at Main Street Interchange Improvement; interchange modification involving turn lanes, roadway widening, and ramp reconfigurations.
  - Updating the project implementation timing and estimated cost to align with current TIP programming; Estimated Cost updated to $**13,717,508 (total).**
- *Updated:* **MTP #4007; DES #2300700; INDOT (in Hendricks County)**
  - US 36 Added Travel Lanes from Corottoman Court to Shiloh Crossing Drive.
  - Remaining on the Existing & Committed Project List (2024–2030), with the anticipated construction year updated to 2030; Estimated Cost updated **to $27,353,500 (total).**
- *Updated:* **MTP #3003; DES #2401706; INDOT (in Hancock County)**
  - New interchange construction on I-70 approximately 3.75 miles west of State Road 9.
  - Updating the project record to reflect current TIP programming, including the addition of preliminary engineering funding in SFY 2027; Estimated Cost updated to **$4,753,400 (total).**
- *Updated:* **MTP #4212; DES #2601FFE; Avon**
  - Dan Jones Road from Bradford Road to Fairwood Boulevard; widening from two to four lanes.
  - The previously identified Dan Jones Road project has been divided into two segments to reflect the portion moving forward and the remaining future segment.
  - Updating the project limits and moving the project from Time Period 2 (2031–2040) to the Existing & Committed Project List (2024–2030); Estimated Cost updated **to $10,435,500 (total).**
- *New Project*: **MTP #4213; Avon**
  - Dan Jones Road from Fairwood Boulevard to County Road 300 South; widening from two to four lanes.
  - Remaining unfunded segment of a previously larger MTP project.
  - Adding the remaining segment to Time Period 2 (2031–2040); Estimated Cost: **$10,682,674 (total).**
- *Updated:* **MTP #5210; DES #2606FFE; Greenwood**
  - Smith Valley Road from Meridian Street to Valley Oaks Road; widening from two to four lanes.
  - The previously identified Smith Valley Road project has been divided into two segments to reflect the portion moving forward and the remaining future segment
  - Updating the project limits and moving the project from Time Period 2 (2031–2040) to the Existing & Committed Project List (2024–2030); Estimated Cost updated **to $12,546,681 (total).**
- *New Project*: **MTP #5211; Greenwood**

    - Smith Valley Road from Valley Oaks Road to Grassy Creek Lane; widening from two to four lanes.
    - Remaining unfunded segment of a previously larger MTP project.
    - Adding the remaining segment to Time Period 2 (2031–2040); Estimated Cost: **$25,021,465 (total).**
- *New Project*: **MTP #4009; DES #2600810; INDOT (in Hendricks County)**
    - New signal installation on US 40 at Miles Road.
    - Adding to the Existing & Committed Project List (2024–2030), with construction programmed in SFY 2028; Estimated Cost: **$731,667 (total).**
- *New Project:* **MTP #4010; DES #2600778; INDOT (in Hendricks County)**
    - New signal installation on US 36 at the east junction of SR 39.
    - Adding to the Existing & Committed Project List (2024–2030), with construction programmed in SFY 2029; Estimated Cost: **$470,000 (total).**
- *New Project*: **MTP #7001; DES #2200049; INDOT (in Morgan County)**
    - New signal installation at SR 144 and Johnson Road.
    - Adding to Time Period 2 (2031–2040), consistent with construction programmed in SFY 2031; Estimated Cost: **$398,749 (total).**

The following table summarizes planned expenditures by plan period for the IMPO in the 9-County Central Indiana conformity area. In each period, the projected revenue is above the planned costs, therefore the plan is fiscally constrained.

IMPO MTP				
Time Period	**2024-2030**	**2031-2040**	**2041-2050**	**TOTAL**
State Revenues	$5.2 B	$10.9 B	$13.9 B	**$30.1 B**
State Spending	$4.8 B	$0.3 B	$0.0 B	**$5.1 B**
Total Local Revenues	$2.1 B	$4.2 B	$5.3 B	**$11.7 B**
Local Spending	$0.5 B	$0.6 B	$1.0 B	**$2.1 B**
IndyGo Revenues	$1.4 B	$2.3 B	$2.9 B	**$6.5 B**
IndyGo Spending	$0.8 B	$0.0 B	$0.0 B	**$0.8 B**

Spending totals updated as part of the MTP Amendment described in this document.
Source: Indianapolis MPO. All figures are rounded and in billions.
Note: Some rows may not add up due to rounding.

9. Conclusion

This conformity determination process demonstrates that these planning documents meet the Clean Air Act and Transportation Conformity rule requirements for the 1997 ozone NAAQS.

The 9-County Central Indiana conformity area MTPs and TIPs demonstrate fiscal constraint per the requirements in 40 CFR 93.108.

Appendix A: Conformity Documentation Public Comments

Public consultation was conducted consistent with planning rule requirements in 23 CFR 450. The Transportation Conformity Determination Report was made available for public review and comment from August 8-17, 2026.

The Indianapolis MPO:

- issued an official public notice to the Indianapolis Star
- posted documents to the IMPO's website
- advertised the public comment opportunity via social media accounts
- included the public comment opportunity in the bi-weekly teMPO e-newsletter

Comments / questions received during the public comment periods:

- No comments.

Comments / questions received during the public hearing:

- No comments.