

# KNOXVILLE REGIONAL TPO FY 2026 – 2029 TIP APPENDIX E: AIR QUALITY CONFORMITY DETERMINATION

Short Conformity Report – Submitted for U.S. DOT Review & Approval

## Adopted by the Knoxville Regional TPO Executive Board

10/22/2025

Also Covering Projects within areas subject to Air Quality Conformity in the Knoxville Region as included in:

The TDOT FY 2026-2029 Statewide Transportation Improvement Program (STIP) and

The Lakeway Area MTPO FY 2026-2029 TIP

Prepared by: Knoxville Regional TPO Staff

For Additional Information contact:

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Knoxville Regional TPO
Email: Mike.Conger@knoxtpo.org

#### E.1. Background and Purpose

The purpose of this section is to demonstrate that the Knoxville Regional Transportation Planning Organization (KRTPO) FY 2026-2029 Transportation Improvement Program (TIP) meets the Air Quality Conformity requirements (also known as transportation conformity) of the Clean Air Act and the Infrastructure Investment and Jobs Act (IIJA). The Knoxville Region is subject to transportation conformity due to it being designated as a "Maintenance Area" for the pollutants of fine particulate matter (PM2.5) and ground-level ozone.

Transportation conformity is the process used to ensure that federal funds will not be spent on projects that cause or contribute to any new violations of the Nation Ambient Air Quality Standards (NAAQS); increase the frequency or severity of NAAQS violations; or delay timely attainments of the NAAQS or any required interim milestone.

#### E.2. Knoxville Region Current Air Quality Status

The Clean Air Act requires the United States Environmental Protection Agency (EPA) to set NAAQS for six "Criteria Pollutants" – Particulate Matter (PM), Ozone, Nitrogen Dioxide, Carbon Monoxide, Sulfur Dioxide, and Lead in order to protect human health and the environment from unsafe levels of these pollutants. These pollutants are regulated through the EPA setting maximum limits on exposure levels that must be reviewed periodically. Regions, which are found to be out of compliance with those limits, may be designated as a "Nonattainment Area". Once a Nonattainment Area demonstrates compliance with the NAAQS it typically enters a 20-year period where it becomes known as a "Maintenance Area" and transportation conformity is still required as a mechanism to help ensure the standards will continue to be met.

Following are the applicable dates for current air quality designations and the geographic area covered by each for the Knoxville Region:

- 2008 8-Hour Ozone Standard currently designated as a Maintenance Area. This standard became effective on July 20, 2012 and included the counties of Blount and Knox, plus a small portion of Anderson County surrounding the TVA Bull Run Fossil Plant. The EPA approved a re-designation of the area to Attainment effective on August 12, 2015.
- 2006 Daily PM2.5 Standard currently designated as a Maintenance Area. This standard became effective on December 14, 2009 and included the identical geographic area as the 1997 Annual PM2.5 Standard. The EPA approved a re-designation of the area to Attainment effective on August 28, 2017.

Previous air quality designations that have since been revoked by EPA include the following:

• 1997 8-Hour Ozone Standard – the Knoxville Region had been considered a Maintenance Area for this Standard, which encompassed all of the area within the 2008 8-Hour Ozone Standard Maintenance Area plus the balance of Anderson, Jefferson, Loudon, Sevier and a small portion of Cocke County within the Great Smoky Mountains National Park. The 1997 8-Hour Ozone Standard was revoked by EPA effective on April 6, 2015 however a court ruling issued on February 16, 2018 (South Coast v. EPA) stated that transportation conformity for this standard would still be required as an anti-backsliding measure effective for any actions starting one-year after the ruling (February 16, 2019). EPA has issued guidance on the format of the conformity documentation required to satisfy this requirement, which can be applied to just the so-called "orphan" area which is not covered by the 2008 8-Hour Ozone Standard. Section E.6. of this appendix covers conformity for the orphan area, which includes proposed transportation projects in both the Tennessee Department of Transportation (TDOT) FY 2026-2029 Statewide Transportation Improvement Program and the FY 2026-2029 Lakeway Area Metropolitan Transportation Planning Organization (LAMTPO) Transportation Improvement Program.

• 1997 Annual PM2.5 Standard – the Knoxville Region was considered a Maintenance Area for this Standard and it covered the identical geography as with the 2006 Daily PM2.5 Standard. The Knoxville Region is meeting the current (2012) Annual PM2.5 Standard of 12 micrograms per cubic meter and the 1997 Standard (15 micrograms per cubic meter) has been revoked by EPA since it is less stringent than the newer standard. Transportation conformity for this Standard no longer applies.

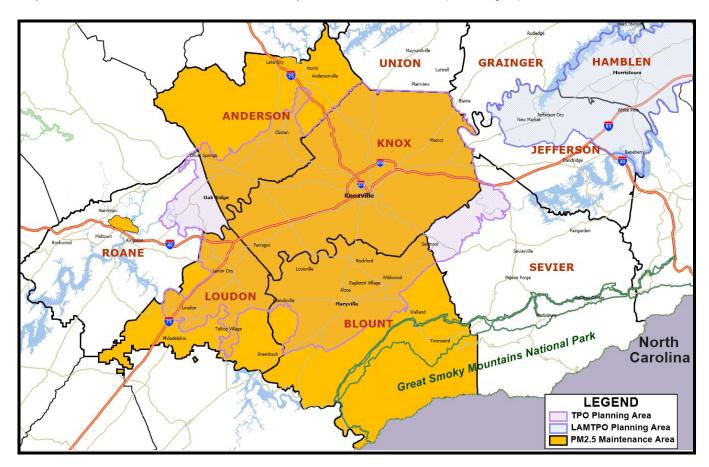
#### MAPS OF CURRENT KNOXVILLE REGION AIR QUALITY STATUS AND AREAS SUBJECT TO TRANSPORTATION CONFORMITY

The following maps show the geographical areas described in the above sections that have been designated as a Maintenance Area for both Ozone and PM2.5. They also show the "orphan area" that was previously designated as a Maintenance Area for the 1997 8-hour Ozone Standard and is once again subject to conformity and all of these areas are also shown in relation to the Metropolitan Planning Area boundary for the Knoxville Regional TPO and the Lakeway MTPO.

GRAINGER UNION HAMBLEN ANDERSON **KNOX** JEFFERSON OCKE ROANE LOUDON North BLOUNT Great Smoky Mountains National Park Carolina LEGEND **TPO Planning Area** LAMTPO Planning Area 1997 Ozone Maintenance Area

Map 1 – 2008 Ozone Maintenance Area and 1997 Ozone "Orphan" Maintenance Area

2008 Ozone Maintenance Area



Map 2 - Former 1997 Annual and Current 2006 Daily PM2.5 Maintenance Area (Same Region)

#### E.3. Emissions Analysis Background

Transportation conformity is demonstrated through a technical process known as an "emissions analysis", in which future estimates of emissions from the transportation system are compared against what has been determined to be sufficient to allow the area to re-attain the air quality standard. Different types of emissions are involved in the production of Ozone and PM2.5 pollution as described below:

- Ozone: Ozone is not directly emitted into the atmosphere; rather it is formed through a chemical reaction between "Volatile Organic Compounds" (VOC) and "Oxides of Nitrogen" (NOx) in the presence of sunlight. Mobile-sources contribute both sources of emissions – VOC are primarily formed from the evaporation of motor fuel, while NOx is formed from the internal combustion process and emitted in vehicle exhaust.
- There are some PM2.5 emissions, known as "Direct PM2.5", that are directly emitted from motor vehicles. Direct PM2.5 emissions consist of elements contained in vehicle exhaust as well as particles resulting from brake and tire wear. In addition, it is believed that NOx emissions can contribute to secondary formation of PM2.5 so it is included in the emissions analysis.

#### E.4. Current Transportation Conformity Status

A conformity determination using a regional emissions analysis was made on the original Knoxville Regional Mobility Plan 2050 and approved by the U.S. DOT on May 30, 2025. A conformity finding for the FY 2023 – 2026 TIP was made on the same date as several TIP amendments were processed to ensure that the TIP maintained consistency with the Mobility Plan as is required. A full copy of the previous conformity determination requiring revised regional emissions analyses are available on the TPO website at:

#### https://knoxmobility.org/resources/plan/adopted/Air%20Quality%20Conformity%20Determination%20Report.pd

 $\underline{\mathbf{f}}$ . That conformity determination also included a section regarding the demonstration of conformity for the orphan area without a regional emissions analysis and further information is included in section E.6 of this appendix.

#### E.5. Conformity Determination for 2008 Ozone Standard and 2006 PM2.5 Standard

#### E.5.a. Reliance on a Previous Regional Emissions Analysis – Overview

The conformity rule allows for the reliance on the previous regional emissions analysis for conformity determinations on TIPs that are consistent with the transportation plan. Section 93.122 (g) of the conformity rule specifies the requirements for reliance on the previous regional emissions analysis and its applicability is required to be documented in a formal conformity determination report for the updated TIP. This report satisfies that requirement as the subsequent sections document the applicability of 40 CFR 93.122 (g) for using a previous regional emissions analysis to demonstrate transportation conformity of the KRTPO FY 2026-2029 TIP for the 2008 Ozone and 2006 PM2.5 NAAQS.

**E.5.b.** Satisfaction of Section 93.122(g) Requirements for Reliance on Previous Regional Emissions Analysis
The following language shown in italics is directly from 40 CFR 93.122(g) regarding reliance on a previous regional emissions analysis. There are four requirements that must be met in order to rely on a previous regional emissions analysis to demonstrate conformity and the documentation that satisfies the requirements for conformity of the KRTPO FY 2026-2029 TIP is included below each one.

Conformity determinations for a new transportation plan and/or TIP may be demonstrated to satisfy the requirements of §§93.118 ("Motor vehicle emissions budget") or 93.119 ("Interim emissions in areas without motor vehicle emissions budgets") without new regional emissions analysis if the previous regional emissions analysis also applies to the new plan and/or TIP. This requires a demonstration that:

(i) The new plan and/or TIP contain all projects which must be started in the plan and TIP's timeframes in order to achieve the highway and transit system envisioned by the transportation plan;

The FY 2026-2029 TIP contains projects directly from and consistent with the Mobility Plan 2050 that are projected to be started in the correct timeframes in order to achieve the highway and transit system envisioned by the transportation plan. Table E-1 at the end of this section contains a cross reference of the projects in the FY 2026-2029 TIP and their corresponding Mobility Plan project ID#'s, exempt and regional significance status and horizon year.

(ii.) All plan and TIP Projects which are regionally significant are included in the transportation plan with design concept and scope adequate to determine their contribution to the transportation plan's and/or TIP's regional emissions at the time of the previous conformity determination;

The regionally significant projects included in the TIP contain design concepts and scopes that are adequate to determine their contribution to the TIP's regional emissions. The TPO maintains a regional travel demand forecasting model that is used to evaluate regionally significant project impacts on regional vehicle miles of travel and traffic operating characteristics in order to determine emissions impacts of proposed transportation projects. Refer to the individual project sheets and summary Table E-1 for applicable project scopes.

(iii.) The design concept and scope of each regionally significant project in the new plan and/or TIP are not significantly different from that described in the previous transportation plan; and

The TIP project scopes of each regionally significant project in the new TIP are consistent with those from the conforming Regional Mobility Plan 2050 as referenced in Table E-1.

(iv.) The previous regional emissions analysis is consistent with the requirements of §§93.118 (including that conformity to all currently applicable budgets is demonstrated) and/or 93.119, as applicable.

The previous regional emissions analysis is consistent with the requirements of §93.118 (Criteria and procedures: Motor vehicle emissions budget). Conformity is applicable for the two NAAQS noted previously (2008 8-Hour Ozone Standard and 2006 Daily PM2.5 Standard). Please refer to the complete conformity determination report from the Mobility Plan 2050 described in Section E.4 for additional information regarding the procedures and results of the previous regional emissions analysis.

Additionally, all relevant planning assumptions included in the conformity determination for the Mobility Plan 2050 are still current and applicable.

#### E.6. Conformity Determination for 1997 8-Hour Ozone Standard Orphan Area

#### E.6.a. Overview of South Coast versus EPA Decision Conformity Ramifications

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. The Knoxville Region was designated as a "maintenance area" 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.

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 EPA for certain transportation activities, including updated or amended metropolitan MTPs and TIPs. The US DOT made a 1997 ozone NAAQS conformity determination for the 2040 MTP's for Knoxville and Lakeway on November 19, 2018 and the FY 2017 – 2020 TIPs. Conformity is required no less frequently than every four years as well as for MTP and TIP updates and amendments. This conformity determination report will address transportation conformity for the update of the TIP and STIP to cover fiscal years 2026 through 2029 and as previously noted, is based on the recently adopted Mobility Plan 2050.

#### E.6.b. Applicable Geography included in 1997 8-Hour Ozone Orphan Area

This section of the conformity determination report is specifically intended to cover what is known as the "orphan area", which are the parts of the 1997 8-hour Ozone Standard that were not included within the 2008 8-hour Ozone Standard nonattainment designation. Map 1 in Section D.2 above shows the geographies included in both the 1997 and 2008 8-hour Ozone Standards and their relationship to the planning areas for the KRTPO and LAMTPO. Areas entirely in green shading are considered part of the TDOT FY 2026-2029 rural area STIP, whereas those areas in green with either purple or blue overlay are covered by Knoxville and Lakeway respectively. The blue areas of Blount, Knox and portion of Anderson counties are subject to conformity as a maintenance area for the 2008 8-hour Ozone Standard and are therefore covered under Section E.5 of this appendix.

#### E.6.c. Orphan Area Conformity Requirements

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). 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 1997 ozone NAAQS for the Knoxville, Lakeway and TDOT FY 2026 – 2029 Transportation Improvement Programs 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)

#### E.6.d. 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 Tennessee SIP does not include any TCMs, see also Section E.6.f.

#### E.6.e. Consultation Requirements

The consultation requirements in 40 CFR 93.112 were addressed both for interagency consultation and public consultation. Interagency consultation was conducted with the Knoxville-Area Interagency Consultation group which includes federal partners such as FHWA, FTA, and EPA as well as state and local partners. Interagency consultation was conducted consistent with the Tennessee Conformity SIP and the conformity regulation's requirements at 40 CFR 93.105. Refer to Section E.7 of this appendix for additional information on interagency consultation.

Public consultation was conducted consistent with planning rule requirements in 23 CFR 450. Refer to Section E.8 for additional information on public consultation.

#### E.6.f. Timely Implementation of TCMs

The Tennessee SIP does not include any TCMs, therefore this does not apply in the Knoxville Region.

#### E.6.g. 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 2050 MTP's for the Knoxville and Lakeway areas and the FY 2026 - 2029 TIP's for KRTPO and LAMTPO and the TDOT FY 2026 - 2029 STIP are fiscally constrained, as demonstrated in applicable sections of the main planning documents for each.

#### E.6.h. Orphan Area Projects

Table E-2 at the end of this appendix provides a listing of the projects within the geography of the 1997 8-Hour Ozone Standard "orphan area" as shown on the map 1. These projects are from the FY 2026 – 2029 Transportation Improvement Program for the Knoxville Regional TPO or the Lakeway Area MTPO in the case of

projects from one of those MPO areas. Projects outside of the MPO areas are considered "rural area" projects and come from the FY 2026 – 2029 TDOT Statewide Transportation Improvement Program (STIP). Guidance from EPA indicates that IAC consultation is still required for projects within the orphan area to determine whether they are exempt or non-exempt, but a regional significance determination is no longer required since that aspect was only applicable to the regional emissions analysis requirement. A project listing within the conformity determination report noting the project's exempt/non-exempt status is necessary because non-exempt projects need to have a conformity determination, and exempt projects do not. Also, if there's a change to an non-exempt project, then the plan/TIP will need to be amended and a new conformity determination done for the plan/TIP. If there's a change to an exempt project, determining conformity for the plan/TIP is not necessary.

#### E.7. Interagency Consultation Process and Comments

The Transportation Conformity Rule in 40 CFR Part 93.105 requires that Interagency Consultation (IAC) be a part of conformity determinations. Interagency Consultation allows for formal deliberation of any issues that arise as part of the conformity analysis and allows for input from all stakeholder agencies into the process. Specific consultation procedures are specified in the Tennessee Transportation Conformity Regulation found in 1200-3-34-.01(3) of the Tennessee State Code.

The Knoxville IAC group was provided a draft FY2026-2029 TIP and conformity determination for a 30-day review period between August 4, 2025 and September 2, 2025. An IAC conference call was held on August 11, 2025 to discuss the draft TIP and conformity determination. Minutes from the IAC call are provided at the end of this appendix. Comments that were received through the IAC consultation process along with the TPO staff's response to each are as follows:

#### Comments from TDEC:

- In the CDR, Section E.9, should the "nonattainment" here be "maintenance" in the first paragraph? Response: Yes, correction will be made to next version.
  - In the TIP, in table 5, there are amounts of emissions reductions, but no units. Can the units be included (tons, pounds, kg, etc.)?

Response: Yes, the units are in kg/day and will be added to Table 5 in the main TIP document.

• In the PM2.5 section, there is a statement that that current annual standard is 12 ug/m3. The current standard is 9 ug/m3.

Response: This clarification will be made and text updated.

#### Comments from TDOT:

- A number of clarifying questions were raised which were responded to separately by the TPO
- In Table 5 of the main TIP document, changing the column names may benefit the reader. Response: The years will be added to the column names to show the timeframes of the baseline (2021), midpoint (2023) and target (2025) periods

#### E.8. Public Involvement and Comments

A formal 30-day public comment period on the draft FY2026-2029 TIP was provided from September 15, 2025 to October 14, 2025. A public notice for the draft TIP and conformity determination was sent to regional newpapers including for the Lakeway area and links provided to the TPO website for public viewing – see Figure E-4 for example public notice proofs. Public meetings were held on September 9, September 24 and October 14, 2025 in

the Knoxville Region as well as on October 2 and October 8, 2025 in the Lakeway Region. No public comments on the conformity determination were received.

#### E.9. Summary

Currently there are no transportation control measures (TCMs) in the Tennessee SIP for the Knoxville 8-hour ozone and PM2.5 nonattainment areas. However, should TCMs be introduced in the area, nothing in the KRMP nor the Transportation Improvement Program will prohibit the timely implementation of any that are approved in the SIP for the Knoxville area.

The KRTPO FY 2026-2029 TIP has been demonstrated to conform with air quality regulations found in the Clean Air Act Amendments of 1990 and the FAST Act by relying on a previous regional emissions analysis. The projects included in the FY 2026-2029 TIP come directly from and are consistent with the current conforming long range transportation plan known as the Knoxville Regonal Mobility Plan 2050, for which conformity was approved by the U.S. DOT on May 30, 2025 (conformity approval letter incuded as Figure E-1 on following page). A copy of the 10/22/2025 adopting resolution for the FY 2026-2029 TIP and accompanying conformity determination is included in the main body of the TIP document as well as in Figure E-2 in this appendix and the 10/8/2025 adopting resolution by the LAMTPO Executive Board is included in this Appendix as Figure E-3.

Figure E-1: Previous Mobility Plan Regional Emissions Analysis Conformity Approval Letter:

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U.S.Department of Transportation Tennessee Division

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

Federal Highway Administration May 30, 2025

In Reply Refer To: HPD-TN

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

Subject: Air Quality Conformity Determination for Knoxville, TN

Dear Mr. Meservy:

The Federal Highway Administration (FHWA) Tennessee Division and Federal Transit Administration (FTA) Region IV Office, in coordination with the Environmental Protection Agency (EPA) Region IV Office, have reviewed the Air Quality Conformity Determination adopted by the Knoxville Regional Transportation Planning Organization (KRTPO) Executive Board on April 30, 2025.

The Air Quality Conformity Determination covers the Knoxville, TN maintenance area for the 2008 8-hour ozone and the 2006 Daily PM<sub>2.5</sub> National Ambient Air Quality Standards (NAAQS) and addresses 2025 Update of Metropolitan Transportation Plan, known as the Mobility Plan 2050 and FY 2023-2026 Transportation Improvement Program (TIP).

Based on our review, we find the documents conform to the ozone and PM<sub>2.5</sub> NAAQS for Knoxville, Tennessee.

If you have any questions regarding this determination, please contact me at (615) 781-5788.

Sincerely,

SONYA Digitally signed by SONYA RICE BAKER DOT: SB:43 - 05'00'

Sonya Baker Safety Engineer

cc: Mr. Gilberto De León, Acting Division Administrator, FHWA TN Division

Ms. Jacinda Russell, Field Operations Team Leader, FHWA TN Division

Mr. Andres Ramirez, Community Planner, FTA Region IV

Ms. Dianna Myers, Environmental Scientist, EPA Region IV

Ms. Simone Jarvis, Life Scientist, EPA Region IV

Ms. Ann Marie Anway, OCT MPO Team Lead, TDOT

Mr. Stacy Morrison, OCT Planning Manager, TDOT

Figure E-2: Knoxville TPO FY 2026-2029 TIP AND Air Quality Conformity Determination Resolution

# A RESOLUTION BY THE EXECUTIVE BOARD OF THE KNOXVILLE REGIONAL TRANSPORTATION PLANNING ORGANIZATION ADOPTING THE FY 2026-2029 TRANSPORTATION IMPROVEMENT PROGRAM & AIR QUALITY CONFORMITY DETERMINATION

WHEREAS, in accordance with requirements of the U.S. Department of Transportation, the elements of the transportation planning process are to receive final approval from the Executive Board of the local Metropolitan Planning Organization; and

WHEREAS, the Transportation Improvement Program must be updated every four years; and

WHEREAS, no local highway and transit projects are eligible for Federal funds until they are programmed in the TIP; and

WHEREAS, the Knoxville Region is subject to air quality conformity requirements under the 1997 and 2008 8-Hour Ozone Standards and the 2006 Daily PM2.5 Standard; and,

WHEREAS, an Air Quality Conformity Determination report was prepared to demonstrate that the implementation of the fiscally constrained FY 2026-2029 TIP conforms to the applicable air quality regulations of the Clean Air Act Amendments of 1990 and the Infrastructure Investment and Jobs Act; and

WHEREAS, the Air Quality Conformity Determination report was provided to appropriate federal, state and local agencies for review and comment through a formal interagency consultation process; and

WHEREAS, this TIP contains projects from or consistent with a conforming Metropolitan Transportation

WHEREAS, notice of public availability of the proposed FY 2026-2029 TIP was published in the newspapers in the Knoxville Metropolitan Planning Area and public meetings for review and comment were held prior to finalizing the TIP; and

WHEREAS, the TIP and Air Quality Conformity Determination Report were made available for public comment for a period of thirty (30) days prior to consideration by the Board; and

WHEREAS, the FY 2026-2029 TIP has been prepared by the participating agencies and the TPO Technical Committee recommends that this TIP be adopted by the Executive Board; and

NOW, THEREFORE, BE IT RESOLVED BY THE KNOXVILLE REGIONAL TRANSPORTATION PLANNING ORGANIZATION EXECUTIVE BOARD;

That the requirements of the 23 CFR 450.324 (Transportation Improvement Program: General) are met and this resolution be adopted as an endorsement of the FY 2026-2029 Transportation Improvement Program.

October 22, 2025

Date

Mayor Glenn Jacobs

**Knox County** 

TPO Executive Board Chair

Doug Burton Coordinator

Knoxville Regional TPO

Figure E-3: LAMTPO TIP Conformity Approval Resoultion

Lakeway Area Metropolitan Transportation Planning Organization (LAMTPO)
Morristown, TN – Jefferson City, TN – White Pine, TN – Hamblen County, TN – Jefferson County, TN
Bean Station, TN.-Grainger County, TN.-Hancock County, TN.

Resolution Number: 2025-009

# A RESOLUTION APPROVING THE AIR QUALITY CONFORMITY DETERMINATION REPORT AS PREPARED BY THE KNOXVILLE TPO

WHEREAS, a comprehensive, cooperative, and continuing transportation planning process is to be carried out in the Lakeway Area Metropolitan Transportation Planning Organization (LAMTPO) study area; and

WHEREAS, The Executive Board of the Lakeway Area Metropolitan Transportation Planning Organization (LAMTPO) serves as a forum for cooperative decision making on transportation issues in the Urbanized Area; and

WHEREAS, the Lakeway Area Metropolitan Transportation Planning Organization promotes the safety, protection, and enhancement of transportation corridors within its jurisdictional boundaries, and

WHEREAS, the Lakeway Area Metropolitan Transportation Planning Organization and the Knoxville TPO are within the same area previously designated nonattainment for the 1997 8-Hour Ozone Standard and have a Memorandum of Agreement to cooperatively address transportation conformity requirements for ozone, and

WHEREAS, the Knoxville TPO has prepared Air Quality Conformity Determination that cover the entire Ozone Maintenance Area, including the LAMTPO planning area within Jefferson County, which has determined that all current plans and programs within LAMTPO meet the air quality conformity requirements.

NOW, THEREFORE, BE IT RESOLVED, that the Lakeway Area Metropolitan Transportation Planning Organization (LAMTPO) Executive Board approves the air quality conformity determination as prepared by the Knoxville TPO at their scheduled meeting on October 8, 2025.

This Resolution shall be effective upon its passage and approval.

ATTEST:

Chairman

LAMTPO Executive Board

October 8, 2025

Date

Figure E-4: Public Notice Examples –Jefferson Standard Banner (LAMTPO) and The Oak Ridger (KRTPO)

## Standard Banner

Public Review and Comment Period for Air Quality Conformity Determination for LAMTPO FY 2026-2029 Transportation Improvement Program (TIP).

The Lakeway Area Metropolitan Transportation Planning Organization (LAMTPO) in cooperation with the Knoxville Regional Transportation Planning Organization (KRTPO) announces a public review and comment period (September 15, 2025 through October 14, 2025) for an Air Quality Conformity Determination made to address the EPA 1997 Ozone Standard, which includes Jefferson County. Transportation projects included within the Jefferson County portion of the LAMTPO TIP must be found to conform with the EPA air quality standards in order to be eligible to receive federal funds. The KRTPO coordinates a single, regional conformity determination for the entire affected area. You are invited to comment by phone, email or in-person at 400 Main Street, Suite 403, Knoxville, TN. Additionally, public comments may be made at the KRTPO Executive Board meeting on Wednesday, September 24, 2025, or at the KRTPO Technical Committee meeting on Tuesday, October 14, 2025. Both meetings are held at 9 a.m. in the Small Assembly Room of the City-County Building, 400 Main Street, Knoxville, TN. Public comments may also be made at the LAMTPO TAC meeting on Thursday, October 2, 2025 at 10 a.m. located at the Morristown City Center, 100 W. 1st North Street Morristown, TN. 37814 or the LAMTPO Executive Board meeting on Wednesday, October 8, 2025 at 9 a.m. located at Jefferson City, City Hall, 112 City Center, Jefferson City, TN. 37760.

Comments can be made to Mike Conger at 865-215-3813 or at: Mike.Conger@knoxtpo.org.

The Air Quality Conformity Determination Report is available in the "Open for Public Review" section of the KRTPO website at www.knoxtpo.org. or www.lamtpo.com

## OAK**RIDGER**

#### **Public Notices**

Originally published at oakridger.com on 09/12/2025

#### PUBLIC NOTICE

Knoxville Regional Transportation Planning Organization\*Draft FY 2026-2029 Transportation Improvement Program (TIP) and associated Air Quality Conformity Report are available for public comment from September 15, 2025 through October 14, 2025.

The Knoxville Regional Transportation Planning Organization (TPO) is responsible for comprehensive transportation planning in the Knoxville Urban Area including Knox County and parts of Anderson, Blount, Loudon, Roane, and Sevier Counties.

An Air Quality Conformity Determination report was prepared to demonstrate that the implementation of projects within the FY 2026-2029 TIP will conform with the requirements of the Clean Air Act.

The draft TIP and air quality conformity determination can be reviewed at https://knoxtpo.org/projects/transportation improvement-program/. Comments can be submitted to Craig Luebke via email at craig.luebke@knoxtpo.org. Copies of the draft TIP are also available for review at the TPO office (400 Main St., Suite 403 Knoxville, TN).

The draft TIP will be presented, and public comments will be accepted at the September 24, 2025 TPO Executive Board meeting and the October 14, 2025 TPO Technical Committee meeting. The draft TIP will be considered for final adoption at the October 22, 2025 Executive Board meeting. Each of the meetings will be held at 9:00 am in the City County Building (400 Main Street, Knoxville, TN) in either the Main or Small Assembly room. The public is welcome at all meetings.

If you need assistance or accommodation for a disability, please contact the TPO at 865-215-2694 and we will be glad to work with you in obliging any reasonable request.

September 12 2025

LOKR0369113

Table E-1: 2026-2029 TIP Project Summary List/Mobility Plan 2050 ID Horizon Year Cross-Reference

NEW TIP ID	Project Name	Termini	Scope of Work	Length	Mobility Plan ID	Conformity Horizon Year	Conformity Status	Phase	Fiscal Year
26-2014-002	Lovell Road (SR-131) Widening	(Lovell Road), From Cedardale Lane to Middlebrook Pike In Knoxville	Widen 2-lane to 4-lane, including pedestrian and bicycle facilities.	1.70	09-637	2035	Non-Exempt	PE-D ROW	2026 2027
26-2014-006	Schaad Rd. Widening	Schaad Rd. from Oak Ridge Hwy. (SR-62) to Pleasant Ridge Rd.	Widen from 2-lane to 4-lane divided road with addition of median and sidewalks.	1.50	09-625	2035	Non-Exempt	ROW	2026
26-2014-025	Pellissippi Pkwy. (SR-162) Extension	(Pellissippi Parkway), From near SR-33 to SR-73 (US-321)(TMA)	Construct new 4 lane	4.90	09-232	2040	Non-Exempt	ROW ROW	2026 2026 2026
26-2014-042	Washington Pike Widening	Washington Pike, North of I-640 to Murphy Road	Widen from 2-lanes to 3/4-lanes with median/center turn lane and including bike/pedestrian facilities.	1.70	09-615	2035	Non-Exempt	CN	2026
26-2014-082	Union Road/N. Hobbs Road Improvements	Union Road, From North Hobbs Road to Everett Road and North Hobbs Road, From Union Road to SR-1 (US-11, Kingston Pike)	Reconstruct 2-lane road with addition of turn lanes and bike/pedestrian facilities	1.00	13-601	2035	Exempt	CN	2026
26-2017-017	Magnolia Ave Streetscape - Phase 3	(US-11/70, East Magnolia Avenue), From North Bertrand Street to North Kyle Street	Construct streetscape improvements along Magnolia Avenue from N. Bertrand Street. to N. Kyle Street. Improvements will include raised medians replacing center left-turn lanes, signal improvements, bike lanes, improved sidewalks, transit stops, and amenities.	0.24	17-608a	2035	Exempt	CN	2026
26-2017-037a	Edgemoor Road (SR-170) - East Segment	From near Melton Lake Drive to SR-9 (US- 25W, Clinton Highway) (IA) (TMA)	Widening 2 lanes to 4 lanes with median and; or center turn lane. Also includes bicycle; pedestrian facilities and a new bridge over the Clinch River. (Split into two segments for PE,ROW, and Construction on PINs 124121.01 and.02)	3.63	09-101b	2035	Non-Exempt	PE-D ROW ROW	2026 2026 2026
26-2017-037b	Edgemoor Road (SR-170) - West Segment	From SR-62 (Oak Ridge Highway) to near Melton Lake Drive (IA)(TMA)	Widening SR-170 from 2 lanes to 4 lanes with median and/or center turn lane. Improvements also include bicycle and pedestrian facilities. (Split into two segments for PE,ROW, and Construction on PINs 124121.01 and.02)	2.55	09-101a	2035	Non-Exempt	PE-D ROW	2026
26-2017-044	Boyds Creek Highway (SR-338) at Old Knoxville Highway Intersection Improvements	(Boyds Creek Highway), Intersection at Old Knoxville Highway, LM 10.58 in Sevierville	Reconfigure the existing intersection to improve safety operations through geometric layout changes, addition of turn lanes, and installation of a new traffic signal.		18-500	2035	Exempt	CN	2026
26-2020-002	Virtue Road/Boyd Station Road Improvements - Ph. 2	1200' south of Needlegrass Ln. to Willow Cove Way.	Widen Virtue Rd. to two 11' lanes with curb and gutter, and provide shared use path connection to existing and planned bike/ped facilities.	1.14	09-630	2035	Exempt	ROW CN	2026 2027
26-2020-004	Woodland Ave. Complete Street	Woodland Avenue, From SR-33 (US-441,	Construction of a complete street project on Woodland Avenue from SR-33 to West Glenwood for approximately .5	0.50	19-606	2035	Exempt	CN	2026
		North Broadway) to West Glenwood Street	miles. Project will also include bicycle lanes, pedestrian crossing improvements, sidewalks, and other ADA upgrades.		13 333	2333		CN	2026

Table E-1: 2026-2029 TIP Project Summary List/Mobility Plan 2050 ID Horizon Year Cross-Reference (continued)

NEW TIP ID	Project Name	Termini	Scope of Work	Length	Mobility Plan ID	Conformity Horizon Year	Conformity Status	Phase	Fiscal Year
26-2020-005	Foothills Mall Drive Extension Phase 2	From Foch St. to McCammon Ave.	Construction of a new 2-lane minor arterial roadway with turn lanes where needed with sidewalk and multi-use path for a length of approximately 0.76 miles. The intersection with Foch Street will be reconstructed as a roundabout.	0.76	10-260	2035	Non-Exempt	ROW	2026
26-2020-006	SR-33 West Broadway Ave. Widening	From US-321(Lamar Alexander Pkwy.) to S. Cedar St.	Construction of an additional westbound left turn lane at the intersection with Lamar Alexander Pkwy and convert continuous center turn lane to an additional westbound through lane along W Broadway Avenue. Project includes construction of new shared use path and other bicycle/pedestrian enhancements	0.45	09-242	2035	Non-Exempt	ROW	2027
26-2023-001	Urban Wilderness Gateway Park	From Sevierville Pike/Moody Ave. to bridge north of Anita Dr.	Approximately 1.2 mile realignment of roadway combining all lanes to the existing southbound roadway. Interchange realignment at southern project terminus, southbound realignment at the northern terminus, extension of Gateway Park with a shared-use path that connects N/S project boundary areas and adjacent neighborhood connections.	1.20	21-606	2035	Exempt	PE-D ROW	2026 2027 2027
26-2023-005	Loudon Rural I-75 Widening from Exit 81 to I-40	From SR-73, Exit 81, to I-40 Interchange Including I-40 from LM 4.11 to LM 4.73 (TMA)	Segment 4 of 4 of 124880.00 Including Bridge over I-75 at 4.51 (PIN 124880.01)	3.35	21-400a	2035	Non-Exempt	CN CN	2027
26-2026-001	North Hall Road	Associates Blvd. to City of Alcoa/City of Maryville limits	Reconstruct roadway corridor with intersection and pedestrian improvements	1.80	24-200	2035	Exempt	PE-N PE-D	2028 2029
26-2026-002	North Park Blvd & Airbase Rd Safety Improvements	Intersection of North Park Blvd/Airbase Rd at Alcoa Hwy	Realign intersection and install traffic signal to improve overall intersection safety.	0.30	13-210	2035	Exempt	PE-N PE-D	2028 2029
26-2026-003	West Bessemer St. Widening	Calderwood St. to North Hall Rd.	Widen from 2 to 5 lane cross sections with center turn lane. Includes new sidewalk.	0.38	24-208	2035	Non-Exempt	PE-N PE-D ROW	2026 2027 2028
26-2026-004	Old Knoxville Hwy (SR-33) Roundabout	Intersection of SR-33 and Old Knoxville Pike	Construct a roundabout at the intersection of East Broadway and Old Knoxville Pike	-	09-212	2035	Exempt	PE-N PE-D ROW	2026 2027 2028
26-2026-005	Tazewell Pike (SR 331) and Fairview Road Intersection Realignment	Intersection of Tazewell Pike (SR 331) and Fairview Road	Re-alignment of the intersection at Tazewell Pike (SR 331) and Fairview Road. Intersection improvements with traffic signal and turn lanes.	-	21-604	2035	Exempt	PE-N PE-D ROW	2026 2027 2028
26-2026-006	Hardin Valley Road Widening	Near Pellissippi Pkwy to Campbell Station Rd	Widen from 3 to 5 lanes	2.10	24-621	2035	Non-Exempt	ROW	2026

Table E-1: 2026-2029 TIP Project Summary List/Mobility Plan 2050 ID Horizon Year Cross-Reference (continued)

NEW TIP ID	Project Name	Termini	Scope of Work	Length	Mobility Plan ID	Conformity Horizon Year	Conformity Status	Phase	Fiscal Year
			Realignment of Carter Rd and Ridgeview Rd with Tazewell Pike					PE-N	2026
26-2026-007	Tazewell Pike (SR-331) at Ridgeview Rd/Carter Rd	From Carter Rd to Ridgeview Rd	to join them together in a four legged intersection to improve safety and sight distance.	0.25	24-607	2035	Exempt	PE-D	2027
			safety and signit distance.					ROW	2028
								PE-N	2026
26-2026-008	Chapman Hwy Safety Improvements Phase 1 (SS4A)	From Blount Ave. to Ft. Dickerson Rd./Woodlawn Pike	Signal modification, redistribution of lane width, median and access management improvements, and separated bicycle	0.70	24-610	2035	Exempt	PE-D	2027
		Ru./ Woodlawii Pike	and pedestrian facilities.					ROW	2028
								CN	2029
26 2026 000	Broadway/Hall of Fame Intersection Improvement	Faces F. Classicand Ave. to Conference Ave.	Replace interchange style intersection with a roundabout. Add	0.30	24 602	2025	Formula	PE-N	2027
26-2026-009	Project	From E. Glenwood Ave. to Grainger Ave.	pedestrian crossing infrastructure.	0.20	24-602	2035	Exempt	PE-D	2027
								ROW	2028
26 2026 010	Magnolia Avenue Streetscape - Phase 4	From N. Kyle St. to Spruce St.	Construct streetscape improvements that include raised medians replacing center left-turn lane, signal improvements, bike lanes, improved sidewalks, transit stops, and amenities.		17-608b		Evampt	PE-N	2026
26-2026-010				0.30	17-6080	2035	Exempt	PE-D	2027
								ROW	2028
26-2026-011	Magnolia Avenue Streetscape - Phase 5	From Spruce St. to N. Cherry St.	Construct streetscape improvements that include raised medians replacing center left-turn lane, signal improvements, bike lanes, improved sidewalks, transit stops, and amenities.	0.40	17-608c	2040	Exempt	PE-N	2029
		From Weisgarber Rd. to Kingston Pike (SR-	Reconstruct 2-lane road with intersection improvements,					PE-N	2027
26-2026-012	Papermill Dr. Complete Street	1)	addition of turn lanes and bicycle/pedestrian facilities	0.61	09-689	2035	Exempt	PE-D	2028
			Reconstruct roadway 1.15 miles to include two twelve foot	1.15				PE-N	2026
26-2026-013	Old Hwy 95 Improvements	From E. 6th Ave. to Town Creek	lanes curb and gutter with drainage improvements. Sidewalks and street lighting will be installed on one side of the street.		24-401	2035	Exempt	PE-D	2026
		Pkwy./Harrison Rd.	Intersections along the corridor with offsets will have alignments shifted to standard designs					ROW	2027
			angiments sinited to standard designs					NOW	2027
26-2026-014	SR-336 Montvale Road Improvements at US-321	From Miller Ave. to US-321/SR-73 (Lamar Alexander Pkwy.)	Widen 0.20 miles of SR-336 at US-321 including bridge replacements on Montvale Road and Mountain View Avenue, stream relocation of Pistol Creek, and new traffic signal installation on Montvale Road at Mountain View Avenue	0.20	24-207	2035	Exempt	PE-N	2029
26-2026-015	Relocated Alcoa Hwy. (SR-115/US-129)	(Relocated Alcoa Highway), from Proposed Interchange at Tyson Blvd to Existing SR- 115 at South Singleton Station Road Stage 2 (IA)(TMA)	Stage construction including grade, drain, base, pave, signal, lighting, ITS, greenway, retaining wall, noise walls, and bridge.  Complete tie-ins at existing SR-115 at Tyson Blvd and proposed interchange at Singleton Station Road as well as all remaining work.	4.90	09-257	2035	Non-Exempt	CN	2028

Table E-1: 2026-2029 TIP Project Summary List/Mobility Plan 2050 ID Horizon Year Cross-Reference (continued)

NEW TIP ID	Project Name	Termini	Scope of Work	Length	Mobility Plan ID	Conformity Horizon Year	Conformity Status	Phase	Fiscal Year
26-2026-302	Surface Transportation System Preservation and Operation Grouping	KNOXVILLE TPO - GROUPING	Preserve and improve the conditions and performance of Federal-aid highways and public roads, safety, traffic operations on Federal-aid highways, bridges and tunnels on public roads, and non-driver access to public transportation and enhanced mobility.		Consistent	N/A	Exempt	All phases  All phases	2026 2027 2028 2029
26-2026-301	Highway Safety Improvement Program Grouping	KNOXVILLE TPO - GROUPING	Achieve the State's strategic or performance- based safety goals by reducing fatalities and serious injuries on all public roads. Upgrade railway- highway grade crossings to eliminating hazards and installing protective devices.		24-705a	N/A	Exempt	All phases All phases All phases All phases All phases	2026 2027 2028 2029
26-2026-303	National Highway System Preservation and Operation Grouping	KNOXVILLE TPO - GROUPING	Support the good condition and performance of the National Highway System, construct new facilities that make progress achieving performance targets of the asset management plan, and increase facility resilience to mitigate the cost of natural disasters.		24-704a	N/A	Exempt	All phases All phases All phases All phases	2026 2027 2028 2029
26-2026-200	Section 5307 Funds	TPO Planning Area	5307 formula transit funding is for public transportation capital, planning, job access and reverse commute projects, as well as operating expenses in certain circumstances.		Consistent	N/A	Exempt	Purchase Purchase Purchase	2026 2027 2028 2029
26-2026-201	Section 5310 Funds	TPO Planning Area	5310 formula transit funding is to enhance mobility for seniors and persons with disabilities by providing funds for programs to serve the special needs of transit-dependent populations beyond traditional public transportation services and Americans with Disabilities Act complementary paratransit services. Funding may be used for capital projects at an 80% federal and 20% local match, for operating assistance at a 50% federal and 50% local match, and administration at 100% federal funding.		Consistent	N/A	Exempt	Purchase Purchase Purchase	2026 2027 2028 2029
26-2026-202	Section 5339 Funds	City of Knoxville	5339 formula or discretionary transit funding is to provide capital funding to replace, rehabilitate and purchase buses and related equipment and to construct bus-related facilities.		Consistent	N/A	Exempt	Purchase Purchase Purchase Purchase	2026 2027 2028 2029
26-2026-305	Bicycle and Pedestrian Grouping	TPO Planning Area	This grouping will be used to fund greenways, sidewalks, bike/pedestrian amenities, streetscaping, and to fund STBG - Transportation Alternatives projects, which provides funding for programs and projects defined as transportation alternatives, including on- and off-road pedestrian and bicycle facilities, infrastructure projects for improving non-driver access to public transportation and enhanced mobility, community improvement activities, and environmental mitigation throughout the Knoxville TPO area.		Consistent	N/A	Exempt	All phases All phases All phases	2026 2027 2028 2029

#### Table E-1: 2026-2029 TIP Project Summary List/Mobility Plan 2050 ID Horizon Year Cross-Reference (continued)

NEW TIP ID	Project Name	Termini	Scope of Work	Length	Mobility Plan ID	Conformity Horizon Year	Conformity Status	Phase	Fiscal Year
								All phases	2026
26-2026-307	Preservation, Operations and Safety Grouping	TPO Planning Area	This grouping will be used for operation, maintenance, repair, resurfacing and safety projects throughout the Knoxville TPO		24-702a, 24-	N/A	Exempt	All phases	2027
20 2020 307	Treactivation, operations and safety Glodping	Ti O Hailling Area	area.		703a	14/4	Exempt	All phases	2028
								All phases	2029
	Planning and Studies Grouping	TPO Planning Area				N/A		All phases	2026
26-2026-306			This grouping will be used to fund planning reports and studies throughout the Knoxville TPO area.		Consistent		Exempt	All phases	2027
								All phases	2028
								All phases	2029
			This grouping will be used to fund projects to reduce traffic congestion and improve air quality throughout the Knoxville TPO planning area. Such projects include Intelligent Transportation Systems (ITS), diesel engine retrofits, transit projects, traffic flow improvements, transportation control measures, bicycle and pedestrian facilities and programs, travel demand management, alternative fuels and vehicles, education and outreach programs and other activities that	24-706a				All phases	2026
						N/A	ı	All phases	2028
								All phases	2029
26-2026-308	Travel Congestion & Clean Air Improvement Grouping	TPO Planning Area			24-706a		Exempt	All phases	2026
								All phases	2026
			accomplish these objectives. Projects are required to be non- regionally significant, environmentally neutral, exempt from air					All phases	2028
			quality conformity requirements, and located in the Knoxville					·	
			TPO area.					All phases	2029

Table E-2 - Orphan Area Project Listing from KRTPO, LAMTPO and TDOT Transportation Improvement Programs

NEW TIP ID	Project Name	Termini	Scope of Work	Length	Mobility Plan ID	Conformity Horizon Year	Conformity Status	Phase	Fiscal Year
KRTPO #26- 2017-044	Boyds Creek Highway (SR-338) at Old Knoxville Highway Intersection Improvements	(Boyds Creek Highway), Intersection at Old Knoxville Highway, LM 10.58 in Sevierville	Reconfigure the existing intersection to improve safety operations through geometric layout changes, addition of turn lanes, and installation of a new traffic signal.		18-500	2035	Exempt	CN	2026
KRTPO #26- 2023-005	Loudon Rural I-75 Widening from Exit 81 to I-40	From SR-73, Exit 81, to I-40 Interchange Including I-40 from LM 4.11 to LM 4.73 (TMA)	Segment 4 of 4 of 124880.00 Including Bridge over I-75 at 4.51 (PIN 124880.01)	3.35	21-400a	2035	Non-Exempt	CN	2027
KRTPO #26- 2026-013	Old Hwy 95 Improvements	From E. 6th Ave. to Town Creek Pkwy./Harrison Rd.	Reconstruct roadway 1.15 miles to include two twelve foot lanes curb and gutter with drainage improvements. Sidewalks and street lighting will be installed on one side of the street.  Intersections along the corridor with offsets will have alignments shifted to standard designs	1.15	24-401	2035	Exempt	PE-N PE-D	2026
?	I-40 Bridge Replacement, Jefferson County	Bridge over French Broad River, LM 14.70	Replace Bridge	1.05	TDOT - 106301.00	2035	Exempt	CONST	2027
?	SR-35 Capacity and Operational Improvements in Sevierville; STIP: 23782035147	SR-448(North Parkway) to Eastgate Road (Includes SR-449 Intersection) in Sevierville	Capacity and Operational Improvements	1.24	TDOT - 106301.00	2035	Exempt	CONST	2026
23002449074	Sevier SR-449 EXT New Construction (Veterans Blvd (SR- 449) Extension Phase 1)	(Veterans Blvd), From near SR-35 to near Robert Henderson Road (IA)(TMA)	Construct new 5 lane facility.	0.70	TDOT - 124788.00	2035	Non-Exempt	CONST	2026
?	Sevier SR-449, Extension (Veterans Blvd (SR-449) Extension Phase 2)	(Veterans Blvd), From Robert Henderson Road north of Pigeon River to SR-66 (TMA)	Design, acquire and construct a 4-lane median divided extension of SR-449 (Veterans Blvd) from Robert Henderson Road north of the Pigeon River to SR-66.	3.20	TDOT - 132674.00	2035	Non-Exempt	CONST	2027
23781040048	Sevier County I-40 Improvements (I-40 Exit 408)	New Interchange at Exit 408 and Connector Road from Dumplin Valley Road to SR-139 (TMA)	Construction of a new interchange near MM 408 on I-40. Construction of a new connector road through this interchange from Douglas Dam Rd (SR-139) to E Dumplin Vally Rd.	2.20	TDOT - 133581.00	2035	Non-Exempt	PE ROW	2026
2010	Agricultural Park Blvd. resurfacing	Witt Boundary Rd to US Hwy 25E	Resurfacing, milling, grading, repaving, sidewalk ADA compliant (if needed) signage, striping	0.75	LAMTPO Resurfacing	N/A	Exempt		
3018	Branner Ave resurfacing	Ken Sparks Way to Old AJ Hwy	Resurface Branner Avenue including milling, grading, repaving, sidewalk ADA compliant if needed, striping, signage, stormwater drainage repair (ifneeded) It may include ITS traffic signal improvements (if needed)	0.33	LAMTPO Resurfacing	N/A	Exempt		

Table E-2 - Orphan Area Project Listing from KRTPO, LAMTPO and TDOT Transportation Improvement Programs (continued)

NEW TIP ID	Project Name	Termini	Scope of Work	Length	Mobility Plan ID	Conformity Horizon Year	Conformity Status	Phase	Fiscal Year
3020	Municipal Drive resurfacing	Old Andrew Johnson Hwy to Black Oak Rd	Resurface Municipal Drive including milling, grading, repaving, sidewalk ADA compliant if needed, striping, signage, stormwater drainage repair (ifneeded), It may include ITS traffic signal improvements (if needed)	0.59	LAMTPO Resurfacing	N/A	Exempt		
3021	Fate Rankin Rd resurfacing	From US Hwy 11E towards Night St (city's corporation boundary) for a distance of 3,000 feet	Resurface Fate Rankin Rd including milling, grading, repaving, sidewalk ADA compliant if needed, striping, signage, stormwater drainage repair (ifneeded), It may include ITS traffic signal improvements (if needed)	0.57	LAMTPO Resurfacing	N/A	Exempt		
3022	Old AJ Hwy resurfacing	SR 92 to Odyssey Rd	Resurface Old Andrew Johnson Hwy including milling, grading, repaving, sidewalk ADA compliant if needed, striping, signage, stormwaterdrainage repair (if needed). It may include ITS traffic signal improvements (if needed)	2.43	LAMTPO Resurfacing	N/A	Exempt		

#### **Knoxville Area Interagency Consultation Group**

### August 11, 2025 2:00 PM Central, 3:00 PM Eastern Call

#### Notes

## Roll Call Knoxville TPO: Mike Conger Craig Luebke Doug Burton EPA: Simone Jarvis Westin Freund FHWA: Sonya Baker Tennessee Department of Transportation: Mohammad Molla Tennessee Department of Environment & Conservation: Marc Corrigan Hannah Nodell Mark A. Reynolds Michelle Oakes Knox County Air Quality Management: Rebecca Larocque Justin Mayer

#### Introduction

Marc Corrigan started the discussion by introducing himself and touching on the items for discussion: the Limited Maintenance Plan (LMP) and the Knoxville TPO's most recent TIP and associated conformity determination. He then introduced Hannah Nodell, with APC's Regulatory Development Section, the principal author of the LMP, to go over some of the LMP's high points.

#### Limited Maintenance Plan (LMP) Discussion

Hannah Nodell began the discussion of the LMP by reminding the IAC that the area was designated as nonattainment for the 2006 24-Hour PM2.5 NAAQS effective December 14, 2009. Then the area was redesignated to attainment for the 2006 24-Hour PM2.5 NAAQS effective September 27, 2017, which included Anderson, Blount, Knox, Loudon and a part of Roane County.

Hannah then discussed the PM2.5 air quality readings since 2015. She noted the spike seen in the 2016-2017 timeframe was attributable to the wildfires in the Gatlinburg area.

Hannah next outlined some of the key metrics that allow an area to pursue an LMP, including there being no increase in measured PM2.5 and monitored concentrations of PM2.5 have been stable. In the development of the LMP, TDEC APC and the Knox County AQMD followed EPA's 2022 LMP Guidance for PM areas.

One of the benefits to pursuing an LMP is that future-year emissions projections are not required. However, an attainment year emissions inventory must be included. Also, the LMP must commit to continuing to monitor for PM2.5, contain contingency measures, as well as a number of other requirements.

Hannah continued in discussing a criterion for potential LMP areas in EPA's guidance document that outlines a statistical test of the design value to help provide for confidence in the area continuing to maintain the NAAQS. The results of the test indicate the Knoxville Area easily passes the test with a margin of safety.

Hannah went into some detail regarding a 2011 TVA Consent Decree with EPA. The consent decree included several commitments for TVA to install control technology and retirement of certain facilities.

Hannah also discussed the 2020 emissions inventory. This inventory covers all anthropogenic source sectors. Hannah indicated the inventory, because of the Covid pandemic, might have some anomalies in it, therefore other inventories were included: the 2014 NEI and 2022 EMP (Emissions Modeling Platform).

The contingency plan section of the LMP is largely a copy of the contingency plan section in the first maintenance plan.

Marc continued the discussion by outlining the reasons for the exclusion of a MVEB in this LMP. He outlined that PM2.5 air quality has improved in the maintenance area despite VMT growth. Marc then went over the VMT projections from the TPO's most recent CDR which indicate an expected modest increase in VMT over time into the future. Marc then brought it back around to the PM2.5 emissions projections from the Knoxville TPO's most recent CDR – including projections for 2026, 2035, 2040 and 2050 demonstrate lower emissions of PM2.5 and NOx over time.

It is for these reasons that no MVEB will be established in this LMP as provided for in 40 CFR 93.109.

Hannah finished up the LMP presentation by going through the proposed LMP schedule.

#### **Questions/Comments Received**

Mohammad asked about the inclusion of NH3 in the inventory. NH3, as well as the other pollutants (like SO2 and VOCs) are considered by EPA to be potential precursors to PM2.5 formation and are required pollutants in the inventories for PM2.5 maintenance areas. Ammonia combines with sulfates and nitrates to form ammonium sulfate and ammonium nitrates.

Mohammad asked about EPA's comment period, should it follow the IAC's comment period? EPA is a part of the IAC.

Mike asked about the schedule of the submission and approval of the LMP. It was indicated that after formal submission to EPA, they have 18 months to approve it. The exact timing is unknown at this point. Mike also asked about how transportation conformity would change after the LMP is approved. Conformity would continue for this NAAQS except for the need for a regional emissions analysis as outlined in CFR 93.109.

Mike asked about the exclusion of information in the LMP on changes to the TVA Kingston fossil plant. It was mentioned that due to litigation, the timing of any conversions at this time is unknown, therefore it was not included in the discussion.

Mike asked about inclusion of the 2023 NEI data. The 2023 NEI is not available yet.

Mohammad asked about the impact of neighboring states not doing enough – how is that addressed? Hannah mentioned the consent decree also impacted TVA facilities outside of Tennessee like the Widow's Creek and Colbert facilities in Alabama.

#### **Knoxville TPO TIP Discussion**

Mike discussed the 2026-2029 TIP and associated CDR. The TIP is updated at least every 3 years and covers a 4-year span. The TIP is a subset of the long-range Metropolitan Transportation Plan (MTP). This TIP is relying on a Short Conformity Determination Report (SCR) since it is a direct subset of the MTP for which a conformity determination was just approved and the projects in the TIP have not changed from those in the MTP.

The CDR covers all the applicable NAAQS: 2008 8-hour ozone, 1997 8-hour ozone and the 2006 Daily PM2.5 standard.

Mike briefly touched on the requirements in EPA's guidance for a conformity determination that relies on a previous reginal emissions analysis as well as the conformity requirements related to the so-called Orphan Area for the 1997 8-hour Ozone Standard. Mike discussed the inclusion of the TIP project lists within the SCR that showed each project's MTP ID number as well as its horizon year to show that the TIP is consistent and a direct subset of the MTP. Mike wrapped up his presentation by giving an overview of the remaining schedule for the TIP update including the remaining IAC review period and subsequent public review which is still to be determined based on the TPO completing its TDOT and FHWA review periods. Mike noted that if those review periods went as currently planned then the TPO is expecting to take the TIP and SCR for adoption at its October 22, 2025 Executive Board meeting.

Mohammad asked about relevance to the 2015 ozone standard. Mike explained that Knoxville was not designated nonattainment for this NAAQS and does not need to determine conformity for it.

Mohammad also asked about needing to demonstrate conformity for the 1997 ozone NAAQS. Mike responded that the South Coast II decision made conformity apply for this NAAQS again to address the anti-backsliding provisions in the Clean Air Act.

Mohammad also asked about the counties shaded in green on the map in Mike's slides. This was the 'orphan' area for the 1997 8-hour ozone NAAQS that was determined by the South Coast II decision to still require conformity determinations. This is the area minus the area captured by the 2008 8-hour ozone NAAQS.

Mike asked about the second maintenance plan at EPA – when might the timing of this final approval be? Simone Jarvis indicated that it is still under EPA review. She would let us know something as soon as she hears about any action on this maintenance plan.

Mike stated that he could follow up with the IAC if desired on the topic of the previous meeting's discussion, which was a visioning workshop for the TPO's next generation

travel demand model. He stated that he could also provide another opportunity for IAC input on the SCR if the timing worked out to schedule that prior to the end of the IAC review period. Marc Corrigan replied that he would be interested in having an opportunity to review the draft report of the model scoping effort.