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## *Memorandum*

TO: Air Quality Conformity Task Force

DATE: April 10, 2014

FR: Harold Brazil

W.I.:

RE: Approach to Conformity Analysis for the 2015 Transportation Improvement Program and Plan Bay Area

MTC staff is in the process of preparing the 2015 Transportation Improvement Program (TIP). See **Agenda Item #3a** for more details.

MTC staff is developing the 2015 Transportation Improvement Program (TIP) and Plan Bay Area (Plan) conformity analysis and seeks the Air Quality Conformity Task Force's review of the proposed approach to adhere to federal conformity regulations. MTC is scheduled to release the Draft Transportation Air Quality Conformity Analysis for the 2015 TIP and Plan Bay Area on Thursday, June 26, 2014.

Attachment A includes a full schedule for review and approval of the conformity analysis for the 2015 TIP and Plan Bay Area. Staff anticipates the revisions requiring a new conformity analysis are primarily minor changes related to changes in project schedules that result in changes to the analysis years.

### **Ozone Requirements**

EPA's final rule designating nonattainment areas for the 2008 ozone NAAQS was published in the Federal Register on May 21, 2012 and was effective July 20, 2012. This rule established initial air quality designations and classifications for the 2008 ozone NAAQS for most areas in the United States, including areas of Indian country.

Concurrent with this designation rule, EPA released an additional final rule that established the approach for classifying nonattainment areas, set attainment deadlines, granted reclassification for selected nonattainment areas in California, and revoked the 1997 ozone standard for transportation conformity purposes. The grace period for showing conformity to the 2008 O<sub>3</sub> standard was started by the May 21, 2012 (77 FR 30088) publication of designations for this standard. The grace period for completing these conformity analysis ends on July 20, 2013 and MTC will need to continue to include conformity to the 1997 ozone standard until the grace period is finished.

### **PM<sub>2.5</sub> Requirements**

The Bay Area's designation as nonattainment was published in the Federal Register on November 13, 2009 and took effect on December 14, 2009. The designation required by December 14, 2010 a new conformity determination using an "interim emissions test", consistent with Section 93.119 of the Transportation Conformity Regulations. This requirement is achieved by demonstrating one of the following:

1. "Baseline Year Test". Emissions for each analysis year for the "Action" are less than or equal to the level of emissions in the year 2008<sup>1</sup>; or

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<sup>1</sup> See 40 CFR 93.119; <http://www.epa.gov/otaq/stateresources/transconf/baseline.htm>

2. “Build/No-Build Test”. Emissions for each analysis year in the “Action” scenario are less than or equal to emissions from the “Baseline” scenario.

### **Analysis Approach**

MTC will review the proposed conformity approach at this Conformity Task Force meeting. MTC will review the approach with the Conformity Task Force again when we present the draft conformity analysis in April 2014. Key aspects of the conformity analysis are as follows:

1. Regional Emissions Analysis: MTC will conduct a new regional emissions analysis to conform the 2015 TIP and the Plan.
2. Latest Planning Assumptions: MTC will use the latest planning assumptions, including:
  - The socio-economic/land use forecast *Jobs/Housing Connection* developed by the Association of Bay Area Governments (ABAG). ABAG staff prepares master databases at the 1,405 census tract-level, and MTC staff then disaggregates these tract-level forecasts to MTC’s 1,454 travel analysis zone system.
  - Updated travel demand forecasts using MTC’s *Travel Model One* (version 0.3), released in spring 2012, calibrated to a 2000 base year, and validated against both year 2000 and year 2005 observed conditions with the most up to date highway and transit networks.
  - VMT estimates used in the EMFAC2011 emission model will be consistent with the California Air Resources Board’s (CARB) recommended adjustment methods.
3. Latest Emissions Model: MTC will apply EMFAC2011 model system to produce emission estimates.
4. Emissions Budget/Interim Emissions:
  - **Ozone**: MTC uses the 1-hour motor vehicle emissions budget from the *2001 Ozone Attainment Plan* as the 8-hour motor vehicle emissions budget to demonstrate conformity with the 8-hour ozone standard. The ozone budget for ROG and NO<sub>x</sub> was compared to quantified emissions for analysis years **2015, 2020, 2030 and 2040**.
  - **Carbon Monoxide (CO)**: MTC used the CO motor vehicle emissions budget from the 2004 Revision to the *California State Implementation Plan for Carbon Monoxide, Updated Maintenance Plan for Ten Federal Planning Areas* to determine conformity with the CO standard. The CO budget will be compared to projected emissions for analysis years **2015, 2018** (the CO Maintenance Plan horizon year), **2020, 2030 and 2040**.
  - **PM<sub>2.5</sub>**: MTC used the “Baseline Year Test” interim emission test to demonstrate conformity with the 24-hour PM<sub>2.5</sub> standard. Consistent with EPA’s Transportation Conformity Rule PM<sub>2.5</sub> and PM<sub>10</sub> Amendments; Final Rule published in the federal register in March 2010. MTC will quantify emissions for both directly emitted PM<sub>2.5</sub> and NO<sub>x</sub> (as the precursor to PM<sub>2.5</sub> emissions) and for the baseline year test, emissions from the planned transportation system are compared to emissions that occurred in the baseline year for analysis years **2015, 2020, 2030 and 2040**. The analysis will be carried out using inputs for the winter season, during which the Bay Area experiences its highest levels of PM<sub>2.5</sub> concentrations. MTC will present documentation regarding the projects proposed for inclusion in the Build scenarios.

5. **Transportation Control Measure (TCM) Implementation:** The motor vehicle emissions estimates for ROG and NOx will include the effects of TCMs A-E in the 2001 Ozone Attainment Plan. These TCMs are now fully implemented.
6. **Financial Constraint:** The TIP must be financially constrained by year, meaning that the amount of dollars committed to the projects (also referred as “programmed”) must not exceed the amount of dollars estimated to be available. The draft 2015 TIP includes the fiscal constraint analysis. No financial changes are proposed for the Plan, so the Plan remains financially constrained in accordance with federal requirements.
7. **Interagency and Public Consultation:** MTC will conduct the appropriate agency and public consultation for the 2015 TIP and conformity analysis

**Attachment A: Draft Schedule for Conformity Analysis of 2015 TIP**

<b>Activity</b>	<b>Timeline</b>
Conformity Task Force Reviews Proposed Conformity Approach	April 24, 2014
MTC Staff Conducts Technical Analysis & Report Preparation	May 2014
MTC’s Programming and Allocations Committee (PAC) Authorizes Release of Draft 2015 TIP and Draft Conformity Analysis	June 11, 2014
Start of 36-Day Public Review of Draft 2015 TIP and Draft Conformity Analysis	June 26, 2014
Public Hearing of Draft 2015 TIP and Draft Conformity Analysis	July 9, 2014
Conformity Task Force Reviews Administrative Draft Conformity Analysis	July 24, 2014
End of 36-Day Public Review of Draft 2015 TIP and Draft Conformity Analysis	July 31, 2014
Conformity Task Force Reviews Proposed Final 2015 TIP and Proposed Final Conformity Analysis (Includes Response to Comments)	August 28, 2014
PAC Approves Final 2015 TIP and Final Conformity Analysis	September 10, 2014
Commission Approves Final 2013 TIP and Final Conformity Analysis	September 24, 2014
FHWA/FTA Approves Conformity Determination	By December 17, 2014