



S A C O G

SACOG Board of Directors

March 9, 2006

Item #06-3-6
Consent

Air Quality Conformity Determinations on the 2006 Metropolitan Transportation Plan and the 2006/08 Metropolitan Transportation Improvement Program

Issue: Under the Federal Clean Air Act Amendments of 1990 (CAAA), SACOG is required to prepare conformity determinations each time a new Metropolitan Transportation Plan (MTP) or Metropolitan Transportation Improvement Program (MTIP) is prepared for the Sacramento air quality planning areas.

Recommendation: The Regional Planning Partnership and the Air Quality Committee recommend that the SACOG Board of Directors:

1. Adopt the attached resolutions finding that the 2006 MTP and the 2006/08 MTIP conform to the ROG and NO_x emission budgets contained in the 2005 Rate-Of-Progress State Implementation Plan, to the CO budgets contained in the 2004 Revision to the California State Implementation Plan for Carbon Monoxide, and that PM-10 emissions are less in the MTP and MTIP than No-MTP and No-MTIP; and
2. Authorize the Executive Director to transmit these findings, along with the accompanying documentation, including all public comments and staff responses, to the appropriate State and Federal agencies for their review and approval.

Committee Action/Discussion: Under the existing conformity regulations, each new transportation plan or transportation improvement program must be found to conform before the transportation plan or transportation improvement program can be approved by the Metropolitan Planning Organization (SACOG). The SACOG region has been under a conformity lapse since October 2004, which has blocked funding and implementation of all transportation projects, except those specifically exempt from air quality conformity. The conformity lapse will end upon approval of the attached conformity determinations by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), which should occur by the middle of April.

SACOG distributed copies of the attached conformity determinations to members of the Regional Planning Partnership and other interested parties on February 14, 2006, for the 2006 MTP and the 2006/08 MTIP. The conformity determinations were prepared in accordance with all applicable federal requirements and were circulated for 30 days in accordance with SACOG's draft inter-agency consultation requirements.

Approved by:

Mike McKeever
Executive Director

MM:DHY:gg
Attachments

Key Staff: Pete Hathaway, Director of Transportation Planning, (916) 340-6235
David H. Young, Senior Planner, (916) 340-6232

ATTACHMENT A

2006

METROPOLITAN TRANSPORTATION PLAN (MTP)

MARCH 2006

ATTACHMENT B

2006/08

**METROPOLITAN TRANSPORTATION
IMPROVEMENT PROGRAM (MTIP)**

MARCH 2006



February 14, 2006

Mr. Gene K. Fong, Division Administrator
U.S. Federal Highway Administration
980 Ninth Street, Suite 400
Sacramento, CA 95814-2724

Mr. Leslie Rogers, Regional Administrator
Federal Transit Administration, Region IX
201 Mission St, Suite 2210
San Francisco, CA 94105

Ms. Lisa Hans, Chief
Mobile Sources Section
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Ms. Jody Jones, District Director
Caltrans District 03
P.O. Box 911
Marysville, CA 95901

Re: Transmittal of the Draft Air Quality Conformity Determinations on the 2006 Metropolitan Transportation Plan (MTP) and 2006/08 Metropolitan Transportation Improvement Program (MTIP) for the Sacramento Ozone (ROG and NOx) Nonattainment Area, Carbon Monoxide (CO) Maintenance Area, and Particulate Matter (PM-10) Moderate Nonattainment Area.

Dear Messrs. Fong and Rogers and Meses. Hans and Jones:

The following air quality conformity determinations on the 2006 MTP (Attachment A), and the 2006/08 MTIP (Attachment B) for the Sacramento Ozone (ROG and NOx) Nonattainment Area, Carbon Monoxide (CO) Maintenance Area, and Particulate Matter (PM-10) Moderate Nonattainment Area are hereby transmitted to you for your review and comment. The SACOG Board of Directors is scheduled to act on these conformity determinations at its March 16, 2006, meeting.

The attached air quality conformity determinations have been prepared in accordance with the conformity requirements as published in the federal register on August 15, 1997, and in accordance with USDOT's January 2, 2002, guidance, *Revised Guidance for Implementing the March 1999 Circuit Court Decision Affecting Transportation Conformity* (93.109).

Auburn
Citrus Heights
Colfax
Davis
El Dorado County
Elk Grove
Folsom
Galt
Isleton
Lincoln
Live Oak
Loomis
Marysville
Placer County
Placerville
Rancho Cordova
Rocklin
Roseville
Sacramento
Sacramento County
Sutter County
West Sacramento
Wheatland
Winters
Woodland
Yolo County
Yuba City
Yuba County

Conformity Approach

The last conformity determination for the Sacramento ozone nonattainment area, CO attainment area and PM-10 moderate nonattainment area was adopted by the SACOG Board of Directors on November 20, 2002 (93.114).

The conformity test for the Sacramento ozone nonattainment, CO attainment, and PM-10 moderate nonattainment area will consist of a quantitative emissions analysis (budget test for ozone and CO and a build vs. no-build test for PM-10), as shown in Attachment C.

Plan and MTIP Status

The SACOG Board of Directors is scheduled to adopt the 2006 MTP and the 2006/08 MTIP at its March 16, 2006, meeting (93.104).

Financial Constraint

The 2006 MTP and the 2006/08 MTIP are fiscally constrained consistent with 23 CFR 450 (93.108).

Inclusion of All Federal and Non-Federal Regionally Significant Projects

The 2006 MTP for 2025 and the 2006/08 MTIP include all federal and non-federal regionally significant projects expected to occur in the Sacramento nonattainment (ozone), maintenance (CO) and moderate (PM-10) areas, along with projects expected to be built in the Yuba/Sutter attainment area [93.122(a)(1)].

Latest Planning Assumptions

The emission estimates developed for this conformity determination were based on the latest population and employment projections for the Sacramento and Yuba/Sutter areas that were adopted by the SACOG Board of Directors on December 16, 2004 (93.110).

Latest Emissions Model

One of the critical inputs into determining emissions associated with the 2006 MTP and the 2006/08 MTIP is the selection of which emissions factors to use. For purposes of this conformity determination, EMFAC 2002 was used, as provided to SACOG by the California Air Resources Board (CARB) along with revised emission factors dated January 24, 2002, which were also provided to SACOG by CARB (93.111). Quantitative emissions analyses have been prepared for the Sacramento nonattainment, maintenance, and moderate areas, as shown in Attachment C.

Modeling Documentation

A complete description of the Sacramento SACMET and Yuba/Sutter Travel Demand models that were used by SACOG to develop the quantitative emissions analyses included with this submittal are available upon request (93.111).

Estimates of regional transportation-related emissions for serious, severe, or extreme ozone nonattainment areas that are used to support conformity determinations must be made in accordance with the procedures laid out under section 93.122 (b) (1) through (3) of the August 15, 1997 Federal Register. The Sacramento ozone nonattainment area is currently classified as a moderate ozone nonattainment area. SACOG's SACMET Travel Demand model, which was used to develop transportation-related emissions for the Sacramento nonattainment areas, currently meets all the modeling requirements, as set forth in the August 15, 1997, Federal Register. The SACMET model was used to develop ROG, NO_x and CO emissions for the Sacramento ozone nonattainment and carbon monoxide maintenance areas, respectively. The EPA's AP-42 emissions model was used to develop PM-10 emissions for the PM-10 nonattainment area (Sacramento County only).

Consultation

Review of this document is part of the conformity consultation process as required under section 93.105 (a) (2), 93.105 (c) (1), and 93.105 (e) and is consistent with the public involvement procedures under 23 CFR 450 (93.112). This draft air quality conformity analysis is being circulated for thirty days to give all affected parties an opportunity to comment. The SACOG Board of Directors is scheduled to act on these conformity determinations at its March 16, 2006, meeting. Any comments received by SACOG during the comment period will be included, along with staff's responses, with the final conformity submittal package.

Over the last year, the Regional Planning Partnership (Partnership), a committee established by the SACOG Board of Directors to review all conformity determinations and assumptions, was asked to review and approve a set of assumptions for use in future conformity determinations. Those assumptions have been incorporated into these conformity determinations.

Transportation Control Measures

SACOG has prepared status reports on the implementation of transportation control measures (TCMs) contained in SACOG's 1982 Air Quality Plan (AQP) and 15% Rate-Of-Progress (ROP) Plan. These status reports were last submitted with SACOG's April 28, 1994, conformity submittal that was approved by Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) on August 16, 1994. The information contained in those documents has not changed since that submittal. Therefore, copies of those documents will not be transmitted with this submittal.

In summary, the 1987 report written by the EPA concluded "that, in general, most of the agencies that committed to carrying out measures under the 1982 Air Quality Plan (AQP) have fulfilled those commitments and, in many cases, have taken actions which go beyond their 1982

Plan commitments." The EPA did, however, point out that not all measures had been fully implemented by 1987. Since 1987, jurisdictions included in the 1982 AQP have fully implemented all of their plan commitments, and in many cases, jurisdictions have gone beyond their plan commitments, either through strengthening of existing measures or adoption of new measures, as documented in the TCM status report.

In addition, the April 28, 1994, submittal included a status report on each of the TCMs that were included in the 15% ROP Plan that was submitted to the EPA on November 15, 1994. As of June 1, 2000, all commitments contained in the 1982 State Implementation Plan (SIP) have been fully implemented. The 1994 SIP included a 1.0 ton per day reduction in both Reactive Organic Gases (ROG) and Oxides of Nitrogen (NOx) attributable to new transportation control measures (TCMs) and land use measures by the year 2005. Achieving these reductions will rely heavily on the implementation of the region's General Plan policies dealing with Transportation Oriented Developments (TODs) and Pedestrian Oriented Developments (PODs). To date, only minimal reductions have been achieved from the implementation of these TCM and land use policies, but the potential emission reductions associated with their implementation will continue to increase in future years. Many land use projects to which these policies have been applied are not yet built or occupied and, thus, the emission benefits have not yet been fully realized. The Sacramento Air Quality Management District has estimated in their 2003 Triennial Report that emission reductions associated with transportation and land use policies have achieved 0.10 tpd of ROG and 0.19 tpd of NOx within the Sacramento ozone nonattainment area through the end of 2003. The Air District estimates that additional reductions of 0.04 tpd of ROG and 0.12 tpd of NOx will be achieved between 2004-2006, due to the District's land use and transportation control measures.

Air Quality Emissions Analysis

In order for SACOG to make conformity determinations on the 2006 MTP and the 2006/08 MTIP, a quantitative emissions analysis must be performed for the Sacramento air quality planning areas. SACOG has completed a quantitative emissions analysis for Reactive Organic Gases (ROG) and Oxides of Nitrogen (NOx) for the Sacramento ozone nonattainment areas, CO maintenance area and PM-10 moderate area, as shown in Attachment C.

Years of Analysis - SACOG prepares estimates of emissions for the Sacramento air quality planning areas for the analysis years described below. Estimates of emissions are prepared in accordance with the conformity regulations as published in the August 15, 1997 Federal Register.

The analysis years of 2008, 2010, 2013, 2018, 2020, and 2027 were chosen for the Sacramento air quality planning areas because 2008 represents an ozone budget year under the Rate-Of-Progress State Implementation Plan (ROP/SIP) and the first analysis year for PM10; 2010 represents one of the two milestone years for CO and is the first ozone milestone year and is also no more than 10 years from the calibration year of the transportation model (2000 is the calibration year for SACOG's current transportation model – 93.122(b)(1)(i); 2013 is the current attainment date for ozone; and 2018 is a milestone year for CO and PM10. The year 2020 was chosen because it represents an horizon year as specified under section 93.106 (a)(1). The year 2027 is used

because it represents the last year of the transportation plan's forecast period and, therefore, is required to be an emission analysis year, as specified under section 93.106 (a)(iv) of the conformity regulation.

Analysis Techniques - The analysis techniques that were used for generating Reactive Organic Gases (ROG), Nitrogen Oxides (NO_x), and Carbon Monoxide (CO) emissions for this conformity submittal are documented in Attachment C. Specifically, SACOG employed its "SACMET" travel demand model for the Sacramento ozone nonattainment area to generate trips and daily vehicle miles traveled (VMT) for each alternative scenario. The outputs from the SACMET model were then inputted into a PC-based version of the Direct Travel Impact Model (DTIM), which is used to generate emissions. One of the critical inputs into the DTIM is the selection of emission factors. For this analysis, SACOG used EMFAC2002, as provided to us by the CARB.

PM-10 Analysis - In addition to the above pollutants analyzed, SACOG also performed a PM-10 analysis for the Sacramento PM-10 nonattainment area. The methodology employed (AP-42) was provided to SACOG by the EPA. Emission projections of PM-10 were made for the years 2008, 2018, and 2027, as shown in Attachment C.

Transit Policies and Ridership

Prior to any transportation conformity modeling, SACOG incorporates any changes to fares or levels of service to the transit operating systems within the Sacramento and Yuba/Sutter planning areas for conformity [93.110 (c)]. There have been no significant changes to the fares or levels of service since the last conformity submittal. The last conformity determinations for the Sacramento ozone nonattainment area, CO attainment area, PM-10 moderate, and Yuba/Sutter ozone nonattainment areas were adopted by the SACOG Board of Directors on June 20, 2002 (93.114).

On September 1, 2005, the Sacramento Regional Transit Board of Directors approved a phased fare increase effective September 1, 2005, along with some minor reductions in bus service. The first phase of the new fare included an increase in the basic fare from \$1.50 to \$1.75, plus a new \$.25 transfer charge, an increase in the monthly pass from \$60 to \$80, and an ADA/Paratransit fare increase from \$3.00 to \$3.25. It is not known at this time whether or not the fare increase will adversely affect ridership.

Transit ridership within the SACOG conformity areas has increased slightly from approximately 36.99 million in FY 2003-04 to approximately 37.54 million in FY 2004-05. This represents an increase in ridership of approximately 1.2%. The following chart shows the changes in ridership from FY 2003-04 to FY 2004-05 for the major transit systems within the SACOG conformity planning areas.

Major Transit Operators within the Sacramento Air Quality Planning Areas	03/04 Actual Ridership	04/05 Actual Ridership
Regional Transit Light Rail	11,022,004	12,008,620
Regional Transit Bus System	19,446,782	18,929,374
Yolobus	1,215,615	1,245,120
Roseville Transit	391,502	390,190
Paratransit	650,616	723,345
Unitrans	3,450,060	3,416,432
Folsom	161,552	157,973
Yuba/Sutter		
Yuba/Sutter Transit Authority	652,529	675,324
Total Ridership	36,990,660	37,545,648

The MTP for 2025 includes a number of goals supporting transit, and they are listed below:

- Develop a fully-integrated, multi-modal transportation system to serve as a catalyst to enhance the quality of life enjoyed by the current and future residents of the Sacramento region.
- Improve access to goods, jobs, services, housing, and other destinations; provide mobility for people and goods throughout the region, in a safe, affordable, efficient and convenient manner.
- Develop a transportation system and related strategies that contribute to achieving healthy air in the region.
- Provide affordable, convenient, safe, and integrated travel choices.
- Pursue a transportation system that addresses the needs of all people in all parts of the region and assure that impacts of transportation projects don't adversely affect particular communities disproportionately.
- Develop the transportation system to promote and enhance environmental quality for present and future generations.
- Influence land use policies to improve access to jobs, services, and housing to everyone in the region by using market forces and the regulatory process.

Public Participation Process

SACOG's Community Input Plan outlines the techniques employed by SACOG to help facilitate public participation during the development of the 2006 MTP, and solicitation of projects for the 2006/08 MTIP. SACOG's Community Input Plan provides for early and continuing participation in our long-range transportation plans, our project-selection or "programming" process (i.e., Federal TIP), and the air-quality "conformity" determination and environmental reviews associated with these plans and programs.

The SACOG Board is scheduled to act on the air quality conformity determination at its March 16, 2006, meeting. This conformity determination will be circulated to the public and interested federal, state, and local agencies and jurisdictions for their review, consultation, and comment for a minimum of thirty (30) days. All comments are due by the close of business on March 15, 2006. If SACOG receives any written comments during the review period, they will be included along with our responses with the final conformity submittal package.

Resolutions of Adoption for the 2006 MTP and the 2006/08 MTIP

Draft copies of the resolutions of adoption finding that the 2006 MTP and the 2006/08 MTIP conform to the 2005 ROP/SIP are included as Attachments D and E, respectively, for your review and comment. The SACOG Board is scheduled to act on this conformity submittal at its March 16, 2006, meeting.

In summation, we hope that the information provided in this letter, plus the supporting documentation, will assist in your review of SACOG's draft air quality conformity determinations on the 2006 MTP and the 2006/08 MTIP for the Sacramento air quality planning areas.

If you have any questions concerning this conformity submittal, please call David Young, Senior Planner, at (916) 340-6232.

Sincerely,

Mike McKeever
Executive Director

MM:DHY:gg
Attachments

cc: Jerome Wiggins, Federal Transit Administration
Sue Kiser, Federal Highway Administration
Karina O'Connor, U.S. Environmental Protection Agency
Larry Sherwood, Caltrans District 3
Scott McGowan, Caltrans Division of Transportation Programming
Steve Luxenberg, Federal Highway Administration



Memo

To: All Interested Parties
From: Mike McKeever, Executive Director
Date: February 14, 2006
Re: Conformity Determination on the 2006 Metropolitan Transportation Plan (MTP) and the 2006/08 Metropolitan Transportation Improvement Program (MTIP) for the Sacramento Ozone (ROG and NOx) Nonattainment Area, Carbon Monoxide (CO) Maintenance Area and Particulate Matter (PM-10) Moderate Nonattainment Area

Attached for your review and comment is a draft air quality conformity determination on the 2006 MTP and the 2006/08 MTIP for the Sacramento ozone nonattainment area, carbon monoxide (CO) maintenance area and particulate matter (PM-10) moderate nonattainment area

The attached conformity determination was prepared in accordance with SACOG's draft inter-agency consultation requirements for conformity determinations and in accordance with all applicable federal air quality requirements. The attached documentation is being circulated for 30 days to provide the public with the opportunity to review these documents prior to any action by the SACOG Board of Directors. The SACOG Board is scheduled to take action on the attached air quality conformity determination at its March 16, 2006, meeting.

Please submit all comments no later than the close of business on March 15, 2006. Any comments received by SACOG during the comment period will be included, along with our responses, with the final conformity package that will be submitted to the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) for their review and approval. We will accept comments by telephone, mail, or facsimile (fax operates 24 hours a day/7 days a week).

If you have any questions or comments regarding the attached information, please call or write David Young, SACOG staff, at either (916) 340-6232 or 1415 L Street, Sacramento, CA 95814.

MM:DHY:gg
Attachment

**Sacramento Area
Council of Governments**

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Sacramento, CA
95814

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Memo

To: Federal Highway Administration
From: Mike McKeever, Executive Director
Date: February 10, 2006
Re: Air Quality Emissions Conformity Analysis on the 2006 Metropolitan Transportation Plan (MTP) and the 2006/08 Metropolitan Transportation Improvement Program (MTIP) for the Sacramento Ozone (ROG, and NOx), Carbon Monoxide (CO) and Particulate Matter (PM-10) Air Quality Planning Areas

BACKGROUND: Federal regulations require that the Sacramento Area Council of Governments (SACOG) prepare Air Quality Conformity Determinations on its transportation plans and programs. The purpose of the conformity determination is to ensure that SACOG's plans and programs "conform" to all applicable federal air quality requirements. Based on guidance from the Environmental Protection Agency (EPA) dated August 15, 1997, and January 2, 2002, conformity determinations must be based on the most recent estimates of on-road vehicle-based emissions. The emissions estimates must also be based upon the most recent population, employment, travel and congestion forecasts from SACOG, acting as the federally designated Metropolitan Planning Organization (MPO) for the Sacramento region.

SACOG has developed an emissions conformity procedure based on the modeling requirements contained in the August 15, 1997, Federal Register. These regulations require us to develop a series of forecasting model runs for the Sacramento air quality planning areas, using our SACMET Travel Demand models, whenever we prepare a conformity determination. This model uses estimates of population, employment, and travel patterns for 2000, as the "Base Year," and future estimates of these same parameters for a series of future years. The future years are designated as "milestone" or "horizon" years for certain types of pollutant emissions under EPA regulations. The Travel Demand Models are used to estimate daily vehicle miles traveled (VMT), in five-mile-per-hour increments, for each model run. The total number of trips for each model run is also generated. Daily VMT and total trips from each model run are then used as inputs to our vehicle-emissions forecasting model, DTIM (Direct Travel Impact Model). The DTIM model forecasts emissions based on the travel-related forecasts from both models.

DISCUSSION: This memo discusses the results of the emissions analysis for the 2006 MTP and the 2006/08 MTIP for the Sacramento reactive organic gas (ROG), nitrogen oxide (NOx), carbon monoxide (CO), and particulate matter (PM-10) air quality planning areas.

A) SACRAMENTO EMISSIONS CALCULATIONS

In order to prepare an emissions conformity analysis on the 2006 MTP and the 2006/08 MTIP, SACOG prepares estimates of emissions for the Sacramento air quality planning areas for the following analysis years: 2008, 2010, 2013, 2018, 2020, and 2027, depending on the pollutant in question. Estimates of emissions are prepared in accordance with the conformity regulations as published in the Federal Register on August 15, 1997.

Once the analysis years have been selected, SACOG uses its SACMET travel demand model to generate daily vehicle miles traveled (VMT) and total trips for each analysis year in question using population and employment assumptions, as shown in the Table 1. The outputs from the transportation models are then inputted into a PC-based version of the Direct Travel Impact Model (DTIM), which is used to generate emissions. One of the critical inputs into the DTIM is the selection of emission factors. For this analysis, SACOG used EMFAC2002, as provided to SACOG by the California Air Resources Board (CARB).

Also included in the emission calculations is credit for NO_x emission reductions from on-road mobile source emissions associated with the Sacramento Emergency Clean Air and Transportation (SECAT) program. On June 30, 2000, the Governor signed the State budget that included \$50 million for the Sacramento region to fund air quality NO_x reduction programs. On May 18, 2000, the SACOG Board of Directors approved \$20 million in Congestion Mitigation and Air Quality (CMAQ) funds to match the governor's \$50 million in general fund revenues. To administer the program, Assembly Bill 2511 (Assemblyman Steinberg) was signed by the Governor on September 18, 2000, authorizing the formation of the Sacramento Emergency Clean Air and Transportation (SECAT) Program.

Since September 18, 2000, SACOG has been implementing the SECAT program and as of October 1, 2002, has obligated approximately \$29 million out of the \$70 million SECAT program. These obligated funds are projected to generate approximately 39% of our target of 2.0 tons per day reduction of NO_x emissions by 2002. Based on the number of applications currently being submitted, we are projecting that we will achieve a minimum of 1.0 ton per day of NO_x emission reductions by November 2002, as shown in Table 2, and the full 3.0 tons per day by 2005.

1) EMISSION FORECASTS FOR THE 2006 MTP FOR THE SACRAMENTO OZONE, CO AND PM-10 AIR QUALITY PLANNING AREAS

a. Emissions Budget Test For Ozone (ROG and NO_x) and Carbon Monoxide (CO)

Under the emissions budget test, all future year ROG and NO_x, emissions associated with the 2006 MTP must be equal to or less than the budgets established in the Sacramento Regional Nonattainment Area 8-Hour Ozone Rate-Of-Progress State Implementation Plan (ROP/SIP) for the Sacramento ozone nonattainment and for CO emissions less than the CO maintenance budgets established in the 2004 Revision to the California State Implementation Plan for Carbon Monoxide, January 30, 2006.

As can be seen from Table 2, ROG, NO_x and CO emissions associated with the 2006 MTP are less than the budgets contained in the SIPs for the Sacramento nonattainment areas for all future years. Under the conformity regulations, as long as future year emissions associated with the 2006 MTP, including any amendments, are equal to or less than the budgets contained in the ROP/SIP, we have

met the emissions budget test under the conformity regulations. As can be seen from Table 2, we have met the budget tests for ROG, NO_x and CO emissions.

b. Build vs. No-Build Test For PM-10

Under the Build vs. No-Build test for PM-10, PM-10 emissions must either be less in the future when compared against the Base Year or less in the “2006 MTP” (MTP) vs. “No-2006 MTP” (No MTP). Table 3 shows that PM-10 emissions are projected to increase significantly in future years. The reason for the increase in PM-10 emissions in the future is because of the methodology used to project PM-10 emissions. We are required to use EPA’s PM-10 forecasting methodology (AP-42), which relies solely on daily VMT. With daily VMT projected to increase significantly in the future, so will PM-10 emissions. However, the conformity test for PM-10 requires that either of two tests be met: either the “MTP” results in less emissions than the “No-MTP” scenario in future years, or the future year emissions are less than the 2000 Base Year levels. In our case, the “MTP” yields less PM-10 emissions in the future than the “No-MTP” scenario, so one of the tests is met and, therefore, we have met the conformity test for PM-10 for the 2006 MTP.

2) EMISSION FORECASTS FOR THE 2006/08 MTIP FOR THE SACRAMENTO OZONE, CO AND PM-10 AIR QUALITY PLANNING AREAS

a. Emissions Budget Test For Ozone (ROG and NO_x) and Carbon Monoxide (CO)

Under the emissions budget test, all future year ROG, NO_x, and CO emissions associated with the 2006/08 MTIP must be equal to or less than the budgets established in the SIPs for the Sacramento ozone nonattainment and CO maintenance areas.

As can be seen from Table 2, ROG, NO_x and CO emissions associated with the 2006/08 MTIP are less than the budgets contained in the SIPs for the Sacramento ozone nonattainment and CO maintenance areas for all future years. Under the conformity regulations, as long as future year emissions associated with the 2006/08 MTIP are equal to or less than the budgets contained in the SIPs, we have met the emissions budget tests under the conformity regulations. As can be seen from Table 2, we have met the budget tests for ROG, NO_x and CO emissions.

b. Build vs No-Build Test For PM-10

Under the Build vs No-Build test for PM-10, PM-10 must either be less in the future when compared against the 2002 Base Year or less in the “2006/08 MTIP” (MTIP) vs. “No 2006/08 MTIP” (No-MTIP). Table 4 shows that PM-10 emissions are projected to increase significantly in the future. The reason for the dramatic increase in PM-10 emissions in the future is because of the methodology used to project PM-10 emissions. We are required to use EPA’s PM-10 forecasting methodology (AP-42), which relies solely on daily VMT. With daily VMT projected to increase significantly in the future, so will PM-10 emissions. However, the conformity test for PM-10 requires that either of two tests be met: either the “2006/08 MTIP” results in less emissions than the “No-MTIP” scenario in future years, or the future year emissions are less than the 2002 Base Year levels. In our case, the “MTIP” yields less PM-10 emissions in the future than the “No-MTIP” scenario, so one of the tests is met and, therefore, we have met the conformity test for PM-10 for the 2006/08 MTIP.

c. CONCLUSIONS

The results of the emissions analyses shows that the 2006 MTP and the 2006/08 MTIP meet the emissions conformity tests as outlined in the August 15, 1997, Federal Register notice for both the Sacramento ozone, carbon monoxide and PM-10 air quality planning areas.

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TABLE 1
Population and Employment Assumptions and VMT Estimates
That Were Used to Develop the March 16, 2006
Conformity Determinations

Sacramento Area

	2008	2013	2020	2027
VMT	59,165,000	66,892,000	74,799,000	83,062,000
Trips	12,165,000	13,206,000	14,811,000	16,992,000
Vehicles	1,819,400	2,009,300	2,308,900	2,714,000
Population	2,256,400	2,425,526	2,677,800	2,939,000
Employment	1,140,200	1,243,136	1,358,000	1,467,000

TABLE 2
ROG, NOx and CO Emissions Budget Tests
for the 2006 Metropolitan Transportation Plan (MTP) and
the 2006/08 Metropolitan Transportation Improvement Program (MTIP)
for the Sacramento Ozone Nonattainment and Carbon Monoxide Maintenance Areas

	TONS PER DAY OF EMISSIONS					
2006 MTP AND 2006/08 MTIP	2008 OZONE YEAR	2010 CO BUDGET YEAR	2013 OZONE ATTAINMENT YEAR	2018 CO BUDGET YEAR	2020 OZONE MILESTONE YEAR	2027 LAST YER OF PLAN
Inventories						
ROG Inventory	39.92	N/A	29.38	N/A	21.20	17.31
Local Adjustments	0.14	N/A	1.00	N/A	1.00	1.00
TOTAL ROG	39.78	N/A	28.38	N/A	20.20	16.31
ROG BUDGET	41.00	N/A	41.00	N/A	41.00	41.00
Surplus/(Deficit)	1.22	N/A	12.62	N/A	20.80	24.69
Pass Conformity Test	Yes	N/A	Yes	N/A	Yes	Yes
NOx Inventory	74.68	N/A	50.52	N/A	29.21	20.43
Local Adjustments	0.31	N/A	1.00	N/A	1.00	1.00
TOTAL NOx	74.37	N/A	49.52	N/A	28.21	19.43
NOx BUDGET	75.00	N/A	75.00	N/A	75.00	75.00
Surplus/(Deficit)	0.63	N/A	25.48	N/A	46.79	55.57
Pass Conformity Test	Yes	N/A	Yes	N/A	Yes	Yes
TOTAL CO	244.26	226.49	N/A	155.42	N/A	75.46
CO Budget	420.00	420.00	N/A	420.00	N/A	420.00
Surplus/Deficit	175.74	193.51	N/A	264.58	N/A	344.54
Pass Conformity Test	Yes	Yes	N/A	Yes	N/A	Yes

- 1) MTIP Inventories include emission forecasts for northern Solano County.
- 2) SACOG is currently implementing the Sacramento Emergency Clean Air and Transportation (SECAT) program to reduce NOx emissions from heavy-duty diesel truck engines.

Table 3						
PM-10 Build Vs. No-Build Conformity Test for the 2006 Metropolitan Transportation Plan (MTP)						
Emission Category	TONS PER DAY OF EMISSIONS					
	2008		2018		2027	
	No MTP	MTP	No MTP	MTP	No MTP	MTP
PM-10	7.17	7.16	8.24	8.18	9.21	9.10

Table 4						
PM-10 Build Vs. No-Build Conformity Test for the 2006/08 Metropolitan Transportation Improvement Program (MTIP)						
Emission Category	TONS PER DAY OF EMISSIONS					
	2008		2018		2027	
	No MTP	MTP	No MTP	MTP	No MTP	MTP
PM-10	7.17	7.16	8.24	8.18	9.21	9.10

Nonattainment area for PM-10 is Sacramento County only. The Build vs. No-Build Test is used for PM-10 conformity findings because ARB has not established any PM-10 budgets for Sacramento County.



SACRAMENTO AREA COUNCIL OF GOVERNMENTS

RESOLUTION NO. 8 - 2006

FINDING THAT THE 2006 METROPOLITAN TRANSPORTATION PLAN (PLAN) CONFORMS TO THE 2005 RATE-OF-PROGRESS STATE IMPLEMENTATION PLAN (ROP/SIP) UNDER THE EPA CONFORMITY RULE FOR THE SACRAMENTO OZONE (ROG AND NOX) NONATTAINMENT AREA, CARBON MONOXIDE (CO) MAINTENANCE AREA AND PARTICULATE MATTER (PM-10) MODERATE NONATTAINMENT AREA

WHEREAS, the Federal Clean Air Act Amendments require that “No department, agency, or instrumentality of the Federal Government shall engage in, support in any way or provide financial assistance for, license or permit, or approve an activity which does not conform to an implementation plan after it has been approved or promulgated under Section 110”; and

WHEREAS, “No Metropolitan Planning Organization designated under Title 23 of the U.S. Code, shall give its approval to any project, program or plan which does not conform to an implementation plan approved or promulgated under Section 110”;

WHEREAS, the assurance of conformity to an implementation plan is the affirmative responsibility of the Executive Director of SACOG; and

WHEREAS, the 2006 Metropolitan Transportation Plan (MTP) promotes travel and development patterns that facilitate attainment of established air quality standards contained in the 2005 ROP/SIP; and

WHEREAS, the projects contained in the MTP do not contradict in a negative manner any specific requirements or commitments contained in the 2005 ROP/SIP; and

WHEREAS, the EPA Conformity Rule requires that transportation plans contribute to reductions in reactive organic gases (ROG), nitrogen oxides (NOx) and carbon monoxide (CO) emissions in future years when compared against an emissions budget; and

WHEREAS, the emissions modeling is consistent with the most recent population, employment and travel congestion estimates; and

WHEREAS, the MTP would result in less ROG, NOx, and CO emissions in all future years when compared against ROG and NOX emission budgets contained in the 2008 ROP/SIP and CO maintenance budgets contained in the 2004 Revision to the California State Implementation Plan for Carbon Monoxide, January 30, 2006, for the Sacramento air quality planning areas; and

WHEREAS, the emissions associated with the MTP do not exceed any of the ROG, NOx or CO emissions budgets contained in the ROP/SIP and CO planning documents for the Sacramento air quality planning areas; and

WHEREAS, the MTP would also result in less PM-10 emissions than the “No MTP” scenario in the future for the Sacramento PM-10 nonattainment area; and

WHEREAS, the cities and counties within the Sacramento Federal Ozone Nonattainment Area have expeditiously implemented the Transportation Control Measures (TCMs) committed to in the ROP/SIP; and

WHEREAS, the 2006 MTP includes goals and guiding principles that provide for expeditious implementation of TCMs contained in the SIP.

NOW, THEREFORE, BE IT RESOLVED, that the SACOG Board of Directors makes the finding that the 2006 MTP conforms with the 2005 ROP/SIP and CO Maintenance Plans based upon the “Transportation Conformity Rule Amendments: Flexibility and Streamlining; Final Rule” for the Sacramento nonattainment areas, as published in the August 15, 1997 Federal Register and in accordance with USDOT’s February 7, 2002 Revised Guidance for Implementing the March 1999 Circuit Court Decision Affecting Transportation Conformity, but that the conformity determination will be effective upon the date of the published Federal Register notice (Vol. XX, No. XX, Fed. Reg., Pg xxxx) announcing the United States Environmental Protection Agency’s (USEPA) adequacy finding for conformity purposes of the mobile source emissions budget for the Sacramento federal 8-hour ozone nonattainment area.

PASSED AND ADOPTED this 16th day of March 2006, by the following vote of the Board of Directors:

AYES:

NOES:

ABSTAIN:

ABSENT:

Heather Fargo
Chair

Mike McKeever
Executive Director



SACRAMENTO AREA COUNCIL OF GOVERNMENTS

RESOLUTION NO. 9 - 2006

FINDING THAT THE 2006/08 METROPOLITAN TRANSPORTATION IMPROVEMENT PROGRAM (PROGRAM) CONFORMS TO THE 2005 RATE-OF-PROGRESS STATE IMPLEMENTATION PLAN (ROP/SIP) UNDER THE EPA CONFORMITY RULE FOR THE SACRAMENTO OZONE (ROG AND NOX) NONATTAINMENT AREA, CARBON MONOXIDE (CO) MAINTENANCE AREA AND PARTICULATE MATTER (PM-10) MODERATE NONATTAINMENT AREA

WHEREAS, the Federal Clean Air Act Amendments require that "No department, agency, or instrumentality of the Federal Government shall engage in, support in any way or provide financial assistance for, license or permit, or approve an activity which does not conform to an implementation plan after it has been approved or promulgated under Section 110"; and

WHEREAS, "No Metropolitan Planning Organization designated under Title 23 of the U.S. Code, shall give its approval to any project, program or plan which does not conform to an implementation plan approved or promulgated under Section 110";

WHEREAS, the assurance of conformity to an implementation plan is the affirmative responsibility of the Executive Director of SACOG; and

WHEREAS, the 2006/08 Metropolitan Transportation Improvement Program (MTIP) promotes travel and development patterns that facilitate attainment of established air quality standards contained in the 2005 ROP/SIP; and

WHEREAS, the projects contained in the MTIP do not contradict in a negative manner any specific requirements or commitments contained in the 2005 ROP/SIP; and

WHEREAS, the EPA Conformity Rule requires that transportation programs contribute to reductions in reactive organic gases (ROG), nitrogen oxides (NO_x), and carbon monoxide (CO) emissions in future years when compared against an emissions budget; and

WHEREAS, the emissions modeling is consistent with the most recent population, employment, and travel congestion estimates; and

WHEREAS, the MTIP would result in less ROG, NO_x, and CO emissions in all future years when compared against ROG and NO_x emission budgets contained in the 2005 ROP/SIP and CO maintenance budgets contained in the 2004 Revision to the California State Implementation Plan for Carbon Monoxide, January 30, 2006 for the Sacramento air quality planning areas; and

WHEREAS, the emissions associated with the MTIP do not exceed any of the ROG, NOx or CO emissions budgets contained in the ROP/SIP and CO planning documents for the Sacramento air quality planning areas; and

WHEREAS, the MTIP would also result in less PM-10 emissions than the “No PROGRAM” scenario in the future for the Sacramento PM-10 nonattainment area; and

WHEREAS, the cities and counties within the Sacramento Federal Ozone Nonattainment Area have expeditiously implemented the Transportation Control Measures (TCMs) committed to in the ROP/SIP; and

WHEREAS, the 2006 Metropolitan Transportation Plan includes projects and policies that provide for expeditious implementation of TCMs contained in the ROP/SIP.

NOW, THEREFORE, BE IT RESOLVED, that the SACOG Board of Directors makes the finding that the 2006/08 MTIP conforms with the 2005 ROP/SIP and CO Maintenance Plan based upon the “Transportation Conformity Rule Amendments: Flexibility and Streamlining; Final Rule” for the Sacramento nonattainment areas, as published in the August 15, 1997, Federal Register and in accordance with USDOT’s February 7, 2002, Revised Guidance for Implementing the March 1999 Circuit Court Decision Affecting Transportation Conformity, but that the conformity determination will be effective upon the date of the published Federal Register notice (Vol. XX, No. XX, Fed. Reg., Pg xxxx) announcing the United States Environmental Protection Agency’s (USEPA) adequacy finding for conformity purposes of the mobile source emissions budget for the Sacramento federal 8-hour ozone nonattainment area.

PASSED AND ADOPTED this 16th day of March 2006, by the following vote of the Board of Directors:

AYES:

NOES:

ABSTAIN:

ABSENT:

Heather Fargo
Chair

Mike McKeever
Executive Director