

**DRAFT 2015 CONFORMITY ANALYSIS ADDRESSING THE 2008 OZONE
AND 2012 PM2.5 STANDARDS
FOR THE 2015 FEDERAL TRANSPORTATION IMPROVEMENT
PROGRAM AND THE 2014 REGIONAL TRANSPORTATION PLAN**

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MADERA COUNTY TRANSPORTATION COMMISSION

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EXECUTIVE SUMMARY

This report presents a 2015 Conformity Analysis for the 2008 Ozone and 2012 PM2.5 Standards. The 2015 Conformity Analysis includes a new analysis year of 2031 for the 2014 RTP and 2015 FTIP (as amended) to address the *Implementation Rule* requirements for the 2008 Ozone standard and a new conformity demonstration for the new 2012 PM2.5 standards. The Madera County Transportation Commission is the designated Metropolitan Planning Organization (MPO) in Madera County, California, and is responsible for regional transportation planning.

EPA designated the San Joaquin Valley nonattainment area for the 2008 Ozone Standard, effective July 20, 2012. Transportation conformity applies one year after the effective date (July 20, 2013). Federal approval for the eight SJV MPO's 2008 Ozone standard conformity demonstrations was received on July 8, 2013.

EPA's March 2015 final rule implementing the 2008 Ozone Standard also revoked the 1997 Ozone Standard for transportation conformity purposes. This revocation became effective April 6, 2015. The final rule included criteria and procedures for the 2008 Ozone national ambient air quality standards and shifted the San Joaquin Valley 2008 Ozone Standard attainment date from December 31, 2032 to July 20, 2032; the new attainment year of 2031 must be modeled.

On January 13, 2013, EPA issued a final rule strengthening the primary 1997 Annual PM2.5 standard to 12 micrograms per cubic meter; maintained both the 1997 24-hour PM2.5 Standards and secondary 1997 annual PM2.5 standard; and maintained both the primary and secondary 2006 24-hour PM2.5 standards, effective March 18, 2013. Conformity applies to all standards.

EPA designated the San Joaquin Valley as nonattainment for the 2012 PM2.5 standards on January 15, 2015, effective April 15, 2015. Transportation conformity for the 2012 PM2.5 Standards applies one year after the effective date or on April 15, 2016. The San Joaquin Valley, was classified Moderate with an attainment date of December 31, 2021. The new attainment year of 2021 must be modeled.

In accordance with Section 93.122(g) of the conformity rule, the 2015 Conformity Demonstration for the 2008 Ozone and 2012 PM2.5 Standards relies on the federally approved previous emissions analysis for PM-10 and PM2.5 (1997 24-hour & Annual Standards and 2006 24-Hour Standard). The 2014 RTP/2015 FTIP and corresponding conformity analysis was approved by FHWA and FTA on February 9, 2015.

The 2014 RTP/2015 FTIP and the corresponding Air Quality Conformity Analysis are incorporated by reference and are available at www.maderactc.org. Additional copies will be provided upon request.

A finding of conformity for the 2014 RTP/2015 FTIP, is therefore supported. The 2015 Conformity Demonstration for the 2008 Ozone and 2012 PM2.5 Standards was approved by the Madera County Transportation Commission on October 21, 2015.

Summarized below are the applicable conformity requirements, conformity tests applied, and the results of the conformity assessment. An overview of the organization of this report is summarized below.

2008 OZONE AND 2012 PM2.5 CONFORMITY REQUIREMENTS

Ozone

EPA's nonattainment area designations for the 2008 ozone standard became effective on July 20, 2012. Conformity for a given pollutant and standard applies one year after the effective date of EPA's initial nonattainment designation. Therefore, conformity for the 2008 ozone standard began to apply on July 20, 2013. The San Joaquin Valley, which consists of eight counties, was designated nonattainment and classified Extreme with an attainment date of July 20, 2032. On March 6, 2015, EPA finalized the implementation rule for 2008 Ozone NAAQS, which shifted the San Joaquin Valley 2008 Ozone Standard attainment date from December 31, 2032 to July 20, 2032. Thus, the new attainment year of 2031 must be modeled.

The San Joaquin Valley has an EPA approved 2007 Ozone Plan (as revised in 2011) that contains sub-area budgets for ROG and NOx. In accordance with EPA guidance dated July 2012, if a 2008 Ozone area has adequate or approved SIP budgets that address the 1997 standards, it must use the budget test until 2008 Ozone standard budgets are found adequate or approved.

When using the budget test, the attainment year of the 2008 ozone standard must be analyzed (e.g. 2031). In addition, in areas that have budgets for a previous ozone standard, consistency with those budgets must also be determined. The new attainment year of 2031 must be modeled.

PM2.5

EPA's nonattainment area designations for the 2012 PM2.5 standards became effective on April 15, 2015. Conformity for a given pollutant and standard applies one year after the effective date of EPA's initial nonattainment designation or April 15, 2016. The San Joaquin Valley, which consists of eight counties, was designated nonattainment and classified Moderate with an attainment date of December 31, 2021.

The San Joaquin Valley has an approved 2008 PM2.5 (1997 Standard) Plan (as revised in 2011) that contains sub-area budgets for PM2.5 and NOx. In accordance with Section 93.109(i)(3) of the conformity rule, if a 2012 PM2.5 area has adequate or approved SIP budgets that address the annual 1997 PM2.5 standards, it must use the budget test until new 2012 PM2.5 standard budgets are found adequate or approved. The attainment year of 2021 must be modeled.

When using the budget test, the attainment year of the 2012 annual PM2.5 standard must be analyzed (e.g. 2021). In addition, in areas that have approved or adequate budgets for the 1997 annual PM2.5 standard, consistency with those budgets must also be determined.

On January 13, 2015, EPA released its proposed *Approval of San Joaquin Valley Plan and*

Supplement for the 2006 PM2.5 Standard and Proposed Reclassification to Serious for the 2006 PM2.5 Standard. In addition, new transportation conformity budgets for the 2006 primary and secondary 24-hour PM2.5 standards are proposed to be approved. At this time, EPA has not finalized the proposed approval of the Plan (including conformity budgets) and reclassification.

On March 23, 2015, EPA released its *Proposed Rule for Implementing National Ambient Air Quality Standards for Fine Particles*. The implementation rule proposes three options, one of which could revoke the primary 1997 annual PM2.5 standard, while maintaining the secondary 1997 annual PM2.5 standard. At the time of the release of this document, the proposed implementation rule has not been finalized and the standard has not been revoked. Note that a revocation of the 1997 primary annual PM2.5 standard will not remove the obligation to demonstrate conformity for the 1997 24-hour PM2.5 standards.

Since recent EPA actions have not been finalized, the 2015 Conformity Demonstration relies on the federally approved previous emissions analyses for the 1997 Annual PM2.5 and 2006 24-hour PM2.5 Standards.

General

Consultation occurred in July 2015 on the proposed procedures and documentation approach for the 2015 Conformity Analysis addressing the 2008 Ozone and 2012 PM2.5 Standards for the 2014 RTP/2015 FTIP (as amended); items included:

1. Latest Planning Assumptions and Transportation Modeling
2. Air Quality Modeling
3. Procedures for Regional Emissions Estimates
4. Transportation Control Measures
5. Conformity Documentation

In addition, on-going interagency consultation is conducted through the San Joaquin Valley Interagency Consultation Group to ensure Valley-wide coordination, communication and compliance with Federal and California Clean Air Act requirements. Each of the eight Valley Metropolitan Planning Organizations (MPOs) and the San Joaquin Valley Unified Air Pollution Control District (Air District) are represented. The Federal Highway Administration (FHWA), Federal Transit Administration (FTA), the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (CARB) and Caltrans are also represented. The final determination of conformity for the TIP and RTP is the responsibility of FHWA and FTA within U.S. DOT.

FHWA has developed a checklist (included in Appendix A) that contains the required items to complete a conformity determination. As indicated above, the 2015 Conformity Demonstration for the 2008 Ozone and 2012 PM2.5 Standards relies on the federally approved previous emissions analysis for PM-10, and PM2.5 (1997 24-hour & Annual Standards and 2006 24-Hour Standards). The checklist contains references to both this document and the federally approved 2014 RTP/2015 FTIP (as amended) Conformity Analysis (incorporated herein by reference) as appropriate.

2008 OZONE AND 2012 PM2.5 CONFORMITY TESTS

Ozone

EPA has indicated that transportation conformity for the 1997 ozone standard stops applying on April 6, 2015. However, existing adequate or approved budgets are required to be used until budgets for the new 2008 standard are found adequate or approved. The San Joaquin Valley has an EPA approved 2007 Ozone Plan (as revised in 2001) that contains sub-area budgets for ROG and NOx.

When using the budget test, the attainment year of the 2008 ozone standard must be analyzed (e.g. 2031). In addition, in areas that have budgets for a previous ozone standard, consistency with those budgets must also be determined.

PM2.5

Existing adequate or approved budgets are required to be used until budgets for the new 2012 PM2.5 standard are found adequate or approved. The San Joaquin Valley has an EPA approved 2008 PM2.5 Plan that contains sub-area budgets for PM2.5 and NOx. When using the budget test, the attainment year of the 2012 PM2.5 standard must be analyzed (e.g. 2021). In addition, in areas that have budgets for a previous 1997 PM2.5 standard, consistency with those budgets must also be determined.

RESULTS OF THE 2008 OZONE AND 2012 PM2.5 CONFORMITY ANALYSIS

A regional emissions analysis was conducted to meet the 2008 Ozone and 2012 PM2.5 standards conformity requirements. The analysis was conducted using the latest planning assumptions and emissions models. The major conclusions of the Madera County Transportation Commission Conformity Analysis are:

- In accordance with the EPA “multi-jurisdictional” guidance separate modeling and conformity documents have been developed by each MPO. The total regional vehicle-related emissions (ROG and NOx) associated with implementation of the 2014 RTP/2015 FTIP (as amended) for the attainment year 2031 analysis year have been estimated and are less than or no greater than the applicable conformity budget. In addition, the total regional vehicle-related emissions (ROG and NOx) for the other applicable analysis years remain unchanged and are less than or no greater than the applicable conformity budgets. The conformity emissions tests for the 2008 Ozone standard are therefore satisfied.
- In accordance with the EPA “multi-jurisdictional” guidance separate modeling and conformity documents have been developed by each MPO. The total regional vehicle-related emissions (PM2.5 and NOx) associated with implementation of the 2014 RTP/2015 FTIP (as amended) for the attainment year 2021 analysis year have been estimated and are less than or no greater than the applicable conformity budget.

In addition, the total regional vehicle-related emissions (PM2.5 and NOx) for the other applicable analysis years remain unchanged and are less than or no greater than the applicable conformity budgets. The conformity emissions tests for the 2012 PM2.5 standard are therefore satisfied.

- In accordance with Section 93.122(g), this conformity demonstration relies on the federally approved previous emissions analysis for PM-10, and PM2.5 (1997 24-hour & Annual Standards and 2006 24-Hour Standard). The 2014 RTP/2015 FTIP Air Quality Conformity Analysis is incorporated by reference and is available at www.maderactc.org. Additional copies will be provided upon request.
- The TIP/RTP will not impede and will support timely implementation of the TCMs that have been adopted as part of applicable air quality implementation plans.
- Consultation has been conducted in accordance with federal requirements.

REPORT ORGANIZATION

The report is organized into five chapters. Chapter 1 provides an overview of the applicable 2008 Ozone and 2012 PM2.5 standards conformity requirements, including approach to meet requirements and the conformity analysis years. Chapter 2 contains a discussion of the latest planning assumptions and air quality modeling used to estimate regional emissions estimates. Chapter 3 contains the documentation required under the federal transportation conformity rule for transportation control measures. Chapter 4 provides an overview of the interagency consultation conducted by the San Joaquin Valley Metropolitan Planning Organizations. The results of the 2015 conformity analysis for the 2014 RTP/2015 FTIP (as amended) are provided in Chapter 5.

Consultation documentation and other related information are contained in the appendices. Appendix C includes copies of consultation correspondence. Appendix F includes documentation of the public meeting process. Comments received on the conformity analysis and responses made as part of the public involvement process are included in Appendix G.

CHAPTER 1 2008 OZONE AND 2012 PM2.5 CONFORMITY REQUIREMENTS

Ozone

EPA issued “Transportation Conformity Guidance for 2008 Ozone Nonattainment Areas” in July 2012. EPA restructured the transportation conformity rule (March 14, 2012) so that existing conformity requirements will apply for any new or revised National Ambient Air Quality Standard (NAAQS). The conformity rule, therefore, applies directly to the 2008 ozone NAAQS.

EPA’s nonattainment area designations for the 2008 ozone NAAQS became effective on July 20, 2012. Conformity for a given pollutant and standard applies one year after the effective date of EPA’s initial nonattainment designation. Therefore, conformity for the 2008 ozone standard will begin to apply on July 20, 2013 for the San Joaquin Valley. Federal approval for the eight SJV MPO’s 2008 Ozone standard conformity demonstrations was received on July 8, 2013.

EPA’s March 2015 final rule implementing the 2008 Ozone Standard also revoked the 1997 Ozone Standard for transportation conformity purposes. This revocation became effective April 6, 2015. The final rule also shifted the San Joaquin Valley 2008 Ozone Standard attainment date from December 31, 2032 to July 20, 2032; the new attainment year of 2031 must be modeled.

PM2.5

On January 13, 2013, EPA issued a final rule strengthening the primary 1997 Annual PM2.5 standard to 12 micrograms per cubic meter; maintained the 1997 24-hour PM Standards and secondary 1997 annual PM2.5 standard; and maintained the primary and secondary 2006 24-hour PM2.5 standards, effective March 18, 2013. Conformity applies to all standards. EPA’s nonattainment area designations for the 2012 PM2.5 standard became effective on April 15, 2015. Conformity for a given pollutant and standard applies one year after the effective date of EPA’s initial nonattainment designation. Therefore, conformity for the 2012 PM2.5 standard will apply on April 15, 2016. The San Joaquin Valley, which consists of eight counties, was designated nonattainment and classified Moderate with an attainment date of December 31, 2021. It is important to note that the 2012 annual PM2.5 nonattainment area boundary for the San Joaquin Valley is exactly the same as the nonattainment area boundary for the 1997 and 2006 standards.

The San Joaquin Valley has an approved 2008 PM2.5 (1997 Standard) Plan (as revised in 2011) that contains sub-area budgets for PM2.5 and NOx. In accordance with Section 93.109(i)(3) of the federal transportation conformity rule, if a 2012 PM2.5 area has adequate or approved SIP budgets that address the annual 1997 standards, it must use the budget test until new 2012 PM2.5 standard budgets are found adequate or approved. The attainment year of 2021 will be modeled

On January 13, 2015, EPA released its proposed *Approval of San Joaquin Valley Plan and Supplement for the 2006 PM2.5 Standard and Proposed Reclassification to Serious for the 2006 PM2.5 Standard*. In addition, new transportation conformity budgets for the 2006 primary and secondary 24-hour PM2.5 standards are proposed to be approved. At this time, EPA has not finalized the proposed approval of the Plan (including conformity budgets) and reclassification.

The San Joaquin Valley has an approved 2008 PM2.5 (1997 Standard) Plan (as revised in 2011) that contains sub-area budgets for PM2.5 and NOx. In accordance with the EPA Interim Transportation Conformity Guidance for 2006 PM2.5 NAAQS Nonattainment areas, if a 2006 PM2.5 area has adequate or approved SIP budgets that address the 1997 standards, it must use the budget test until new 2006 PM2.5 standard budgets are found adequate or approved.

On March 23, 2015, EPA released its *Proposed Rule for Implementing National Ambient Air Quality Standards for Fine Particles*. The implementation rule proposes three options, one of which could revoke the primary 1997 annual PM2.5 standard, while maintaining the secondary 1997 annual PM2.5 standard. The proposed implementation rule has not been finalized and it is not clear if the standard will be revoked. Note that a revocation of the 1997 primary annual PM2.5 standard will not remove the obligation to demonstrate conformity for the 1997 24-hour PM2.5 standards. The San Joaquin Valley has an approved 2008 PM2.5 (1997 Standard) Plan (as revised in 2011) addressing both versions of the 1997 PM2.5 standards that contains sub-area budgets for PM2.5 and NOx. The applicable conformity test is the emissions budget test. The conformity budgets from Table 5 of the November 9, 2011 Federal Register will be used to demonstrate conformity to both 1997 annual and 24-hour PM2.5 standards.

General

The Conformity Analysis for the 2015 FTIP and 2014 RTP was federally approved on February 9, 2015. The 2015 Conformity Analysis addresses the new attainment year of 2031 for the 2008 Ozone NAAQS. In addition, this 2015 Conformity Analysis includes a conformity demonstration for the new 2012 PM2.5 standards.

In accordance with the conformity rule, the interagency consultation process is being used for conducting regional emissions analyses and demonstrating conformity for the 2008 Ozone and 2012 PM2.5 standards. Transportation network development and conformity analysis were completed in August, 2015. Public review of the 2015 Conformity Demonstration for the 2008 Ozone and 2012 PM2.5 Standards addressing new attainment years occurred in August/September, followed by MPO adoption in October, 2015. The 2015 Conformity Demonstration addressing the 2008 Ozone and 2012 PM2.5 Standards for the 2014 RTP/2015 FTIP (as amended) was submitted to FHWA in October for approval on or before December 31, 2015.

Presented first is a review of the air quality designation status, conformity test requirements, and analysis years for this 2015 Conformity Analysis for the 2008 Ozone and 2012 PM2.5 Standards.

A. 2008 OZONE AND 2012 PM2.5 STANDARDS AIR QUALITY DESIGNATIONS APPLICABLE TO THE SAN JOAQUIN VALLEY

The conformity regulation (section 93.102) requires documentation of the applicable pollutants and precursors for which EPA has designated the area nonattainment or maintenance. In addition, the nonattainment or maintenance area and its boundaries should be described.

Madera County Transportation Commission is located in the federally designated San Joaquin Valley Air Basin. The borders of the basin are defined by mountain and foothill ranges to the east and west. The northern border is consistent with the county line between San Joaquin and Sacramento Counties. The southern border is less defined, but is roughly bounded by the Tehachapi Mountains and, to some extent, the Sierra Nevada range. Conformity for the 2015 FTIP (as amended) and 2014 RTP includes analysis of existing and future air quality impacts for each applicable pollutant.

The San Joaquin Valley is currently designated as nonattainment for the 2008 Ozone and 2012 PM2.5 National Ambient Air Quality Standards (NAAQS).

B. 2008 OZONE AND 2012 PM2.5 STANDARD CONFORMITY TESTS

Ozone

EPA's final rule implementing the 2008 ozone standard also revoked the 1997 ozone standard for transportation conformity purposes. This revocation is effective April 6, 2015. Areas designated nonattainment for the 2008 ozone standard are required to use any existing adequate or approved SIP motor vehicle emissions budgets for a prior ozone standard until budgets for the 2008 ozone standard are either found adequate or approved. Therefore, when a 2008 ozone nonattainment area has adequate or approved budgets for any ozone standard, the budget test requirements (40 CFR 93.118) must be met.

EPA approved the 2007 Ozone Plan (as revised in 2011) and conformity budgets on March 1, 2012, effective April 30, 2012. The SIP identified both reactive organic gases (ROG) and nitrogen oxides (NOx) subarea budgets in tons per average summer day for each MPO in the nonattainment area. It is important to note that the boundaries for both the 2008 ozone standard and previous ozone standard are identical. Consequently, for this conformity analysis, the SJV MPOs will continue to conduct demonstrations for subarea emissions budgets as established in the 2007 Ozone Plan (as revised in 2011).

The approved conformity budgets from Table 5 of the EPA Federal Register notice are provided in the table below. These budgets will be used for the 2015 Ozone (2008 Standard) Conformity Demonstration.

Table 1-1:
Approved Budgets from the 2007 Ozone Plan (as revised in 2011)
 (Summer tons/day)

County	2011		2014		2017		2020		2023	
	ROG	NOx	ROG	NOx	ROG	NOx	ROG	NOx	ROG	NOx
Fresno	14.3	36.2	10.7	30.0	9.3	22.6	8.3	17.7	8.0	13.5
Kern (SJV)	12.7	50.3	9.7	42.7	8.7	31.7	8.2	25.1	7.9	18.6
Kings	2.8	10.7	2.1	8.9	1.8	6.7	1.7	5.3	1.6	4.0
Madera	3.4	9.3	2.5	7.7	2.2	5.8	2.0	4.7	1.9	3.6
Merced	5.1	19.9	3.7	16.7	3.2	12.4	2.9	9.9	2.8	7.4
San Joaquin	11.1	24.6	8.4	20.5	7.2	15.6	6.4	12.4	6.3	10.0
Stanislaus	8.5	16.9	6.4	13.9	5.6	10.6	5.0	8.4	4.7	6.4
Tulare	8.8	16.0	6.7	13.2	5.8	10.1	5.3	8.1	4.9	6.2

PM2.5

According to Section 93.109(i)(3), areas designated nonattainment for the 2012 PM2.5 standards are required to use existing adequate or approved SIP motor vehicle emissions budgets for a prior annual PM2.5 standard until budgets for the 2012 PM2.5 standards are either found adequate or approved. Therefore, when a 2012 PM2.5 nonattainment area has adequate or approved budgets for a previous annual PM2.5 standard, the budget test requirements (40 CFR 93.118) must be met.

The 2008 PM2.5 (1997 standard) Plan (as revised in 2011) was approved by EPA on November 9, 2011, which contains motor vehicle emission budgets for PM2.5 and NOx established based on average annual daily emissions, as well as a trading mechanism. The motor vehicle emissions budget for PM2.5 includes directly emitted PM2.5 motor vehicle emissions from tailpipe, brake wear and tire wear. VOC, SOx, ammonia, and dust (from paved roads, unpaved roads, and road construction) were found to be insignificant and not included in the motor vehicle emission budgets for conformity purposes.

On March 27, 2015 EPA proposed reclassification of the San Joaquin Valley to Serious nonattainment of the 1997 PM2.5 standard. The San Joaquin Valley 2015 PM2.5 Plan (1997 standard) was adopted by ARB on May 21, 2015 and subsequently submitted to EPA on June 25, 2015. The Plan requests reclassification of the San Joaquin Valley nonattainment area to Serious, proposes new conformity budgets, and lays out a strategy to attain the 1997 24-hour

PM2.5 standards. No final EPA action has been taken on the plan. As a result, the proposed SIP budgets are assumed to be unavailable for use and the 2008 PM2.5 Plan conformity budgets are the only budgets applicable at this time.

For this Conformity Analysis, the SJV will continue to conduct determinations for subarea emission budgets as established in the 2008 PM2.5 implementation plan. The conformity budgets from Table 5 of the November 9, 2011 Federal Register are provided below and will be used to compare emissions resulting from the 2014 RTP/2015 FTIP (as amended).

**Table 1-2:
Approved Budgets from the 2008 PM2.5 Plan (as revised in 2011)**
(tons per average annual day)

County	2012		2014	
	PM2.5	NOx	PM2.5	NOx
Fresno	1.5	35.7	1.1	31.4
Kern (SJV)	1.9	48.9	1.2	43.8
Kings	0.4	10.5	0.3	9.3
Madera	0.4	9.2	0.3	8.1
Merced	0.8	19.7	0.6	17.4
San Joaquin	1.1	24.5	0.9	21.6
Stanislaus	0.7	16.7	0.6	14.6
Tulare	0.7	15.7	0.5	13.8

The CARB technical revisions to the motor vehicle emissions budgets also included a trading mechanism that allows trading from the motor vehicle emissions budget for the PM2.5 precursor NOx to the motor vehicle emissions budget for primary PM2.5 using a 9 to 1 ratio. The trading mechanism allows the agencies responsible for demonstrating transportation conformity in the San Joaquin Valley to supplement the 2014 budget for PM-2.5 with a portion of the 2014 budget for NOx, and use these adjusted motor vehicle emissions budgets for PM-2.5 and NOx to demonstrate transportation conformity with the PM2.5 SIP for analysis years after 2014. As noted above, EPA approved the 2008 PM2.5 Plan (as revised in 2011) on November 9, 2011, which includes continued approval of the trading mechanism.

The trading mechanism will be used only for conformity analyses for analysis years after 2014. To ensure that the trading mechanism does not impact the ability to meet the NOx budget, the NOx emission reductions available to supplement the PM2.5 budget shall only be those remaining after the NOx budget has been met.

C. 2008 OZONE AND 2012 PM2.5 CONFORMITY ANALYSIS YEARS

When using the budget test for the 2008 ozone and 2012 PM2.5 standards, the regional emissions analysis is required to be performed for:

- The attainment years for the 2008 ozone and 2012 PM2.5 standards, if they are within the timeframe of the transportation plan and conformity determination,
- The last year of the timeframe of the conformity determination, and
- Intermediate years as necessary, such that analysis years are no more than ten years apart.

In addition, in areas that have budgets for a previous ozone and PM2.5 standards that are established for years in the timeframe of the conformity determination, consistency with those budgets must also be determined.

For the 2008 Ozone Standard, the San Joaquin Valley has been classified as an Extreme nonattainment area with an attainment date of July 20, 2032. The 2032 analysis year will be updated to 2031.

For the 2012 PM2.5 Standard, the San Joaquin Valley has been classified as a Moderate nonattainment area with an attainment date of December 31, 2021. The 2021 analysis year will be modeled.

**Table 1-3:
San Joaquin Valley 2015 Conformity Analysis Years for the 2008 Ozone and 2012 PM2.5 Standards**

Pollutant	Budget Years ¹	Attainment/Maintenance Year	Intermediate Years	RTP Horizon Year
Ozone	2014/2017/2020/2023	2031	NA	2040
PM2.5	NA	2014/2021 ²	2017/2025/2035	2040

¹ Budget years that are not in the time frame of the transportation plan/conformity analysis are not included as analysis years (e.g., 2014), although they may be used to demonstrate conformity.

² Note: 2014 is the attainment year for the 1997 and 2006 PM2.5 standards. 2021 is the attainment year for the 2012 PM2.5 standards.

CHAPTER 2 LATEST PLANNING ASSUMPTIONS

The transportation conformity rule allows conformity determinations to be based on the latest planning assumptions that are available at the time the conformity analysis begins. According to the conformity rule, the time the conformity analysis begins is “the point at which the MPO or other designated agency begins to model the impact of the proposed transportation plan or TIP on travel and/or emissions”.

The 2015 Conformity Demonstration for the 2008 Ozone and 2012 PM2.5 Standards is based on the federally approved 2014 RTP/2015 FTIP Conformity Analysis with updates as appropriate. The interagency consultation process for the 2014 RTP/2015 FTIP and corresponding conformity analysis began in September 2013 and is documented in the current federally approved conformity analysis. Additional interagency consultation was conducted in July 2015 regarding items for the 2015 Conformity Demonstration addressing the 2008 Ozone and 2012 PM2.5 Standards.

In accordance with Section 93.122(g) of the conformity rule, this conformity demonstration relies on the federally approved previous emissions analysis for PM-10, and PM2.5 (1997 24-hour & Annual Standards and 2006 24-Hour Standard).

The 2014 RTP/2015 FTIP and corresponding conformity analysis was federally approved on February 9, 2015. The previous conformity determinations are incorporated by reference. For this conformity determination, there are:

- No revisions to the TIP/RTP, including no additions or deletions of regionally significant projects,
- No changes in the design concept and scope of existing regionally significant projects, that require a new regional emissions analysis,
- No revisions that delay or accelerate the completion of regionally significant projects across conformity analysis years, and
- No changes to the time frame of the transportation plan.

In accordance with Section 93.108, the Madera County Transportation Commission re-affirms that the 2014 RTP/2015 FTIP (as amended) are fiscally constrained with DOT’s metropolitan planning regulations at 23 CFR part 450.

A. SOCIOECONOMIC DATA

There have been no official updates to the socioeconomic projections used by the Valley MPO transportation models since the 2014 RTP/2015 FTIP Conformity Analysis. In accordance with Section 93.110 of the federal conformity rule, the most recent estimates of population and employment projections that have been officially approved by the Metropolitan Planning Organization will be used.

B. TRANSPORTATION MODELING

There have been no official updates to the Valley MPO transportation models since the 2014 RTP/2015 FTIP Conformity Analysis. The same traffic modeling and networks will be utilized for the 2015 Conformity Demonstration, except for the updated attainment year 2031 which addresses the 2008 Ozone Implementation Rule requirements and the new 2021 attainment year for the 2012 PM2.5 Standards. Travel data for the 2021 and 2031 attainment years have been developed consistent with the federally approved 2014 RTP/2015 FTIP.

C. TRAFFIC ESTIMATES

A summary of the population, employment, and travel characteristics for the Madera County Transportation Commission transportation modeling area for each scenario in the 2015 Conformity Analysis is presented in Table 2-1. Note that the only updates from the federally approved 2014 RTP/ 2015 FTIP Conformity Analysis are the new attainment year 2021 for the 2012 PM2.5 Standards and the revised attainment year 2031 for the 2008 Ozone Standard. Note 2014 is not in the timeframe of the conformity analysis and therefore is not included in the analysis.

Table 2-1
Traffic Network Comparison for Horizon Years Evaluated in
2015 Conformity Analysis for the 2008 Ozone and 2012 PM2.5 Standards

Horizon Year	Total Population (thousands)	Employment (thousands)	Average Weekday VMT (millions)	Total Lane Miles
2017	171	51	5.41	1,617
2020	183	55	5.66	1,678
2021	187	56	5.74	1,687
2023	195	59	5.88	1,704
2025	206	61	6.03	1,712
2031	230	69	6.49	1,842
2035	242	74	6.79	1,929
2040	265	80	7.17	1,952

Note: Detailed results can be found in Appendix D.

D. AIR QUALITY MODELING

EMFAC2011

On March 6, 2013 EPA announced the availability of this latest version of the California EMFAC model for use in SIP development in California. EMFAC 2011 was required for conformity use six months thereafter.

In accordance with Section 93.111 the latest emission estimation model (EMFAC 2011) was used in the 2015 Conformity Demonstration for the 2008 Ozone and 2012 PM2.5 Standards. The EPA approved methodology for updating the default vehicle activity data was used consistent with the 2014 RTP/2015 FTIP Conformity Analysis.

For the 2015 Conformity Analysis, the methodology consisted of:

- (1) Running EMFAC for the 2031 attainment year for 2008 Ozone using adjusted VMT and speed fraction data.
- (2) Running EMFAC for the 2021 attainment year for 2012 PM2.5 using adjusted VMT and speed fraction data.
- (3) Applying ARB's Heavy-Duty Diesel Vehicle VMT Recession Adjustment Methodology to EMFAC default vehicle class distributions.
- (4) Estimating ROG and NOx total exhaust emissions for all vehicles for an average summer day for the new analysis year 2031 addressing 2008 Ozone Standard.
- (5) Estimating PM2.5 and NOx total exhaust emissions for all vehicles for an average annual day for the analysis year 2021 addressing 2012 Annual PM2.5 Standards.
- (6) Subtracting control measures estimates for an average summer day contained in the EPA approved 2007 Ozone Plan (as revised in 2011).
- (7) Subtracting control measures estimates for an annual average day contained in the EPA approved 2008 PM2.5 Plan (as revised in 2011) for the 1997 PM2.5 Standard.
- (8) Results rounded to the tenths place; then compared to applicable budgets.

In summary, the regional emissions estimates from the federally approved 2014 RTP/2015 FTIP (as amended) for the other analysis years (Ozone – 2017, 2020, 2023, and 2040; PM2.5 – 2017, 2025, 2035 and 2040) remain unchanged. Consultation on the general air quality modeling methodology applied in the 2015 Conformity Analysis was the subject of a memorandum distributed on July 15, 2015 for interagency consultation; EPA and FHWA provided concurrence on July 22, 2015.

E. STATE IMPLEMENTATION PLAN MEASURES

The air quality modeling procedures and associated spreadsheets contained in Chapter 3 Air Quality Modeling assume emission reductions consistent with the air quality plans for the 2015 Conformity Analysis addressing the 2008 Ozone Standard and 2012 PM2.5 Standards. The emission reductions assumed for these committed measures reflect the latest implementation status of these measures.

Ozone

Committed control measures in the EPA approved 2007 Ozone Plan (as revised in 2011) that reduce mobile source emissions are shown in Table 2-2.

**Table 2-2
2007 Ozone Plan Measures Assumed in the Conformity Analysis**

Measure Description	Pollutants
Existing Local Reductions: Rule 9310 (School Bus Fleets)	Summer NOx
Existing State Reductions: Carl Moyer Program & AB 1493 GHG Standards	Summer ROG Summer NOx
New/Proposed Local Reductions: Rule 9410 (Employer Based Trip Reduction)	Summer ROG Summer NOx
New/Proposed State Reductions: Smog Check & Reformulated Gasoline (RFG)	Summer ROG Summer NOx

NOTE: This table is consistent with the 2007 8-Hour Ozone Plan (as revised in 2011) which was approved by EPA on March 1, 2012 (effective April 30, 2012). In addition, the ARB “Truck Rule” has been included in EMFAC2011.

PM2.5

Committed control measures in the 2008 PM2.5 Plan (as revised in 2011) that reduce mobile source emissions and are included in the conformity demonstration are shown in Table 2-3.

**Table 2-3:
2008 PM2.5 Plan Measures Assumed in the Conformity Analysis**

Measure Description	Pollutants
Existing Local Reductions: Rule 9310 (School Bus Fleets)	Annual PM2.5 Annual NOx
Existing State Reductions: Carl Moyer Program & AB 1493 GHG Standards	Annual PM2.5 Annual NOx
New/Proposed Local Reductions: Rule 9410 (Employer Based Trip Reduction)	Annual PM2.5 Annual NOx
New/Proposed State Reductions: Smog Check	Annual PM2.5 Annual NOx

NOTE: This table is consistent with the 2008 PM2.5 Plan (as revised in 2011) as approved by EPA on November 9, 2011

(effective January 9, 2012). In addition, the ARB “Truck Rule” has been included in EMFAC2011.

F. SUMMARY OF PROCEDURES FOR REGIONAL EMISSIONS ESTIMATES

As previously noted, the 2015 Conformity Analysis for the 2008 Ozone and 2012 PM2.5 Standards is based on the 2014 RTP/2015 FTIP (as amended) with various updates as appropriate. Because EMFAC 2011 continues to be used, previous step-by-step air quality modeling procedures have not been updated; rather the worksheets have been updated as noted below.

The 2014 RTP/2015 FTIP conformity procedures were subject to interagency consultation in September 2013. In July 2015, proposed updates to be used for the 2015 Conformity Demonstration for the 2008 Ozone and 2012 PM2.5 Standards were provided for interagency consultation. Concurrence was received from both EPA and FHWA. Updated documentation for the 2015 Conformity Analysis is provided in Appendix D, including:

- Updated 2014 Conformity EMFAC Spreadsheet: new attainment years for the 2008 Ozone and 2012 PM2.5 standards, and
- Updated 2014 Conformity Totals spreadsheet: new demonstration for the 2008 Ozone and 2012 annual PM2.5 standards.

CHAPTER 3 TRANSPORTATION CONTROL MEASURES

The Transportation Conformity Rule (40 CFR 93.113) requires that the TIP/RTP “must provide for the timely implementation of TCMs in the applicable implementation plan.” The 2014 RTP/2015 FTIP Conformity Document included a summary of requirements, applicable implementation plans, and findings.

The Project TID table that was prepared at the request of FHWA for the 2004 Conformity Analysis has been updated in each subsequent conformity analysis. In addition, a new 2002 RACM TID Table was prepared in 2006 to address the more general RACM commitments that require additional timely implementation documentation per EPA. As part of the 2015 Conformity Demonstration for the 2008 Ozone and 2012 PM2.5 Standards, the SJV MPOs have updated both the Project TID table and RACM TID tables contained in Appendix E of the federally approved 2014 RTP/2015 FTIP (as amended).

The project status has been updated for projects that were to be completed in 2015. In addition, the update confirms that projects identified in the Timely Implementation Documentation table have not been deleted from the TIP. Justification has been provided for any project implementation delays as well as the proposed approach to resolve.

Since there is no “new” RTP development with the 2015 Conformity Demonstration for the 2008 Ozone and 2012 PM2.5 Standards, there will be no update with respect to the inclusion of additional long-range local government control measures.

CHAPTER 4 INTERAGENCY CONSULTATION

The requirements for consultation procedures are listed in section 93.105 of the transportation conformity rule. Consultation is necessary to ensure communication and coordination among air and transportation agencies at the local, state and federal levels on issues that would affect the conformity analysis such as the underlying assumptions and methodologies used to prepare the analysis.

A summary of the interagency consultation and public consultation conducted to comply with these requirements is provided below. Interagency consultation on the 2015 Conformity Analysis addressing 2008 Ozone and 2012 PM2.5 Standards for the 2014 RTP/2015 FTIP (as amended) is documented in Appendix C. Appendix F includes the public meeting process documentation. The responses to comments received as part of the public comment process are included in Appendix G.

A. INTERAGENCY CONSULTATION

Consultation is generally conducted through the San Joaquin Valley Interagency Consultation Group (combination of previous Model Coordinating Committee and Programming Coordinating Group). The San Joaquin Valley Interagency Consultation (IAC) Group has been established by the Valley Transportation Planning Agency's Director's Association to provide a coordinated approach to valley transportation planning and programming (Transportation Improvement Program, Regional Transportation Plan, and Amendments), transportation conformity, climate change, and air quality (State Implementation Plan and Rules). The purpose of the group is to ensure Valley wide coordination, communication and compliance with Federal and California Transportation Planning and Clean Air Act requirements. Each of the eight Valley MPOs and the Air District are represented. In addition, the Federal Highway Administration, Federal Transit Administration, the Environmental Protection Agency, the California Air Resources Board and Caltrans (Headquarters, District 6, and District 10) are all represented. The IAC Group meets approximately quarterly.

On July 15, 2015, a memo describing the approach for the 2015 Conformity Demonstration addressing the 2008 Ozone and 2012 PM2.5 standards was distributed to the IAC for review and comment. This memo included as summary of the requirements and documentation on the proposed approach including the following: latest planning assumptions and transportation modeling, air quality modeling, transportation control measures, and conformity documentation. No comments were received; concurrence was received from EPA and FHWA on July 22, 2015.

The boilerplate conformity document was distributed for interagency consultation in August 2015. Comments received have been addressed in the response to comments contained in Appendix G and/or in this document as appropriate.

The Draft 2015 Conformity Analysis for the 2008 Ozone and 2012 PM2.5 was released on September 16, 2015 for a 30-day public comment period, followed by Board adoption on October 21, 2015. Federal approval of the 2015 Conformity Analysis is anticipated in December, 2015.

B. PUBLIC CONSULTATION

In general, agencies making conformity demonstrations shall establish a proactive public involvement process that provides opportunity for public review and comment on conformity demonstrations for TIPs/RTPs. In addition, all public comments must be addressed in writing.

All MPOs in the San Joaquin Valley have standard public involvement procedures. In general the TIP/RTP and corresponding conformity analysis are the subject of a public notice and 30-day review period prior to adoption. A public meeting is also conducted prior to adoption and all public comments are responded to in writing. The Appendices contain corresponding documentation supporting the public involvement procedures.

CHAPTER 5 TIP AND RTP 2008 OZONE AND 2012 PM2.5 STANDARDS CONFORMITY

The principal requirements of the federal transportation conformity rule for TIP/RTP assessments are: (1) for the 2008 Ozone standard, when emissions budgets are available, the TIP and RTP pass the emissions budget for the new attainment year 2031, (2) for the 2012 PM2.5 standards, when emissions budgets are available, the TIP and RTP pass the emissions budget for the attainment year 2021 (3) the latest planning assumptions and emission models must be employed; (4) the TIP and RTP must provide for the timely implementation of transportation control measures (TCMs) specified in the applicable air quality implementation plans; and (5) consultation. The final determination of conformity for the TIP/RTP is the responsibility of the Federal Highway Administration and the Federal Transit Administration within U.S. DOT.

In accordance with Section 93.122(g), this conformity demonstration relies on the federally approved previous emissions analysis for PM-10, and PM2.5 (1997 24-hour & Annual Standards and 2006 24-Hour Standard). The 2014 RTP/2015 FTIP Air Quality Conformity Analysis is incorporated by reference and is available at www.maderactc.org. Additional copies will be provided upon request.

In accordance with Section 93.108, Madera County Transportation Commission re-affirms that the 2014 RTP/2015 FTIP (as amended) are fiscally constrained with DOT's metropolitan planning regulations at 23 CFR part 450.

The previous chapters and the appendices present the documentation for all of the requirements listed above for conformity determinations except for the conformity test results. Prior chapters have also addressed the updated documentation required under the federal transportation conformity rule for the latest planning assumptions and the implementation of transportation control measures specified in the applicable air quality implementation plans.

This chapter presents the results of the 2008 Ozone and 2012 PM2.5 conformity tests, satisfying the remaining requirement of the federal transportation conformity rule. The applicable conformity tests were reviewed in Chapter 1. For each test, the required emissions estimates were developed using the transportation and emission modeling approaches required under the federal transportation conformity rule and summarized in Chapter 2. The results are summarized below, followed by a more detailed discussion of the findings for each pollutant. Table 5-1 presents emissions results for the 2008 Ozone Standard (ROG and NOx) and emissions results for the 2012 PM2.5 Standard (PM2.5 and NOx) demonstrations in tons per average summer or annual day, as applicable for each of the analysis years tested.

For the 2008 Ozone Standard, the applicable conformity test is the emissions budget test, using the 2007 Ozone Plan (as revised in 2011) budgets established for ROG and NOx for an average summer (ozone) season day. EPA approved the Plan and conformity budgets (as revised in 2011) on March 1, 2012, effective April 30, 2012. The modeling results for all analysis years indicate that the on-road vehicle ROG and NOx emissions predicted for each of the "Build" scenarios are less than the emissions budgets. The TIP/RTP therefore satisfies the conformity emissions test for the 2008 Ozone standard.

For 2012 PM2.5 Standards, the applicable conformity test is the emissions budget test, using the 2008 PM2.5 Plan (1997 standard) budgets established for PM2.5 and NOx for an average annual (PM2.5) day. EPA approved the 2008 PM2.5 Plan (as revised in 2011) November 9, 2011, effective January 9, 2012. The modeling results for all analysis years indicate that the on-road vehicle PM2.5 and NOx emissions predicted for the “Build” scenarios are less than the emissions budget. The TIP/RTP therefore satisfy the conformity emissions test for the 2012 PM2.5 Standards.

As all requirements of the Transportation Conformity Rule have been satisfied, a finding of conformity for the 2008 Ozone and 2012 PM2.5 standards is supported for the 2014 RTP/2015 FTIP (as amended).

**Table 5-1:
Conformity Results Summary**

2015 Conformity Results Summary -- MADERA

Pollutant	Scenario	Emissions Total		DID YOU PASS?	
		ROG (tons/day)	NOx (tons/day)	ROG	NOx
2008 Ozone Standards	2017 Budget	2.2	5.8		
	2017	1.3	5.1	YES	YES
	2020 Budget	2.0	4.7		
	2020	1.1	3.8	YES	YES
	2023 Budget	1.9	3.6		
	2023	1.0	2.8	YES	YES
	2031	1.0	2.7	YES	YES
	2040	1.0	2.9	YES	YES

Pollutant	Scenario	PM2.5 (tons/day)	NOx (tons/day)	PM2.5	NOx
		2014 Budget	0.3	8.1	
2012 PM2.5 Standards	2017	0.2	5.4	YES	YES
	2014 Budget	0.3	8.1		
	2021	0.2	3.5	YES	YES
	2014 Budget	0.3	8.1		
	2025	0.2	2.8	YES	YES
	2014 Budget	0.3	8.1		
	2035	0.2	2.9	YES	YES
	2014 Budget	0.3	8.1		
	2040	0.2	3.0	YES	YES

REFERENCES

EPA, 2012. Guidance for Transportation Conformity Implementation in Multi-Jurisdictional Nonattainment and Maintenance Areas. U.S. Environmental Protection Agency. EPA-420-B-12-046. July 2012.

EPA, 2015. Implementation of the 2008 National Ambient Air Quality Standards for Ozone: State Implementation Plan Requirements. Final Rule. U.S. Environmental Protection Agency. Vol. 80. No. 44. March 6, 2015.

EPA, 2015. Fine Particulate Matter National Ambient Air Quality Standards: State Implementation Plan Requirements. Proposed Rule. U.S. Environmental Protection Agency. Vol. 80. No. 55. March 23, 2015.

APPENDIX A

CONFORMITY CHECKLIST

CONFORMITY ANALYSIS DOCUMENTATION

FHWA Checklist for MPO TIPs/RTPs

June 27, 2005

40 CFR	Criteria	Page	Comments
§93.102	Document the applicable pollutants and precursors for which EPA designates the area as nonattainment or maintenance. Describe the nonattainment or maintenance area and its boundaries.	Ch. 1	2014 RTP/2015 FTIP Ch. 1
§93.104 (b, c)	Document the date that the MPO officially adopted, accepted or approved the TIP/RTP and made a conformity determination. Include a copy of the MPO resolution. Include the date of the last prior conformity finding.	E.S.	2014 RTP/2015 FTIP E.S.
§93.104 (e)	If the conformity determination is being made to meet the timelines included in this section, document when the new motor vehicle emissions budget was approved or found adequate.	N/A	
§93.106 (a)(2)ii	Describe the regionally significant additions or modifications to the existing transportation network that are expected to be open to traffic in each analysis year. Document that the design concept and scope of projects allows adequate model representation to determine intersections with regionally significant facilities, route options, travel times, transit ridership and land use.	N/A App B has been updated to include 2032	2014 RTP/2015 FTIP Ch. 2, App. B
§93.108	Document that the TIP/RTP is financially constrained (23 CFR 450).	E.S.	2014 RTP/2015 FTIP E.S.
§93.109 (a, b)	Document that the TIP/RTP complies with any applicable conformity requirements of air quality implementation plans (SIPs) and court orders.	Ch. 1, 2, 3, 5	2014 RTP/2015 FTIP Ch. 1, 2, 3, 4, 5, 6
§93.109 (c-k)	Provide either a table or text description that details, for each pollutant and precursor, whether the interim emissions tests and/or the budget test apply for conformity. Indicate which emissions budgets have been found adequate by EPA, and which budgets are currently applicable for what analysis years.	Ch. 1	2014 RTP/2015 FTIP Ch. 1
§93.110 (a, b)	Document the use of latest planning assumptions (source and year) at the "time the conformity analysis begins," including current and future population, employment, travel and congestion. Document the use of the most recent available vehicle registration data. Document the date upon which the conformity analysis was begun.	Ch. 2	2014 RTP/2015 FTIP Ch. 2
USDOT/EP A guidance	Document the use of planning assumptions less than five years old. If unable, include written justification for the use of older data. (1/18/02)	Ch. 2	2014 RTP/2015 FTIP Ch. 2
§93.110 (c,d,e,f)	Document any changes in transit operating policies and assumed ridership levels since the previous conformity determination. Document the use of the latest transit fares and road and bridge tolls. Document the use of the latest information on the effectiveness of TCMs and other SIP measures that have been implemented. Document the key	Ch. 2	2014 RTP/2015 FTIP Ch. 2

MCTC 2015 Conformity Analysis: 2008 Ozone and 2012 PM2.5

40 CFR	Criteria	Page	Comments
	assumptions and show that they were agreed to through Interagency and public consultation.		
§93.111	Document the use of the latest emissions model approved by EPA.	Ch. 2	2014 RTP/2015 FTIP Ch. 3
§93.112	Document fulfillment of the interagency and public consultation requirements outlined in a specific implementation plan according to §51.390 or, if a SIP revision has not been completed, according to §93.105 and 23 CFR 450. Include documentation of consultation on conformity tests and methodologies as well as responses to written comments.	Ch. 4	2014 RTP/2015 FTIP Ch. 5
§93.113	Document timely implementation of all TCMs in approved SIPs. Document that implementation is consistent with schedules in the applicable SIP and document whether anything interferes with timely implementation. Document any delayed TCMs in the applicable SIP and describe the measures being taken to overcome obstacles to implementation.	Ch. 3, App. E	2014 RTP/2015 FTIP Ch. 4, App. E
§93.114	Document that the conformity analyses performed for the TIP is consistent with the analysis performed for the Plan, in accordance with 23 CFR 450.324(f)(2).	Analysis addresses both documents	2014 RTP/2015 FTIP Analysis addresses both documents
§93.118 (a, c, e)j	<u>For areas with SIP budgets:</u> Document that emissions from the transportation network for each applicable pollutant and precursor, including projects in any associated donut area that are in the Statewide TIP and regionally significant non-Federal projects, are consistent with any adequate or approved motor vehicle emissions budget for all pollutants and precursors in applicable SIPs.	Ch. 5	2014 RTP/2015 FTIP Ch. 6
§93.118 (b)	Document for which years consistency with motor vehicle emissions budgets must be shown.	Ch. 1	2014 RTP/2015 FTIP Ch. 1
§93.118 (d)	Document the use of the appropriate analysis years in the regional emissions analysis for areas with SIP budgets, and the analysis results for these years. Document any interpolation performed to meet tests for years in which specific analysis is not required.	Ch. 5	2014 RTP/2015 FTIP Ch. 6
§93.119 ¹	<u>For areas without applicable SIP budgets:</u> Document that emissions from the transportation network for each applicable pollutant and precursor, including projects in any associated donut area that are in the Statewide TIP and regionally significant non-Federal projects, are consistent with the requirements of the “Action/Baseline”, “Action/1990” and/or “Action/2002” interim emissions tests as applicable.	N/A	N/A
§93.119 (g)	Document the use of the appropriate analysis years in the regional emissions analysis for areas without applicable SIP budgets.	N/A	N/A
§93.119 (h,i)	Document how the baseline and action scenarios are defined for each analysis year.	N/A	N/A
§93.122 (a)(1)	Document that all regionally significant federal and non-Federal projects in the nonattainment/maintenance area are explicitly modeled in the regional emissions analysis. For each project, identify by which analysis it will be open to traffic. Document that VMT for non-regionally significant Federal projects is accounted for in the regional emissions analysis	Ch. 2, App B	2014 RTP/2015 FTIP Ch. 2, App B
§93.122	Document that only emission reduction credits from	Ch. 2	2014 RTP/2015 FTIP Ch. 2

40 CFR	Criteria	Page	Comments
(a)(2, 3)	TCMs on schedule have been included, or that partial credit has been taken for partially implemented TCMs. Document that the regional emissions analysis only includes emissions credit for projects, programs, or activities that require regulatory action if: the regulatory action has been adopted; the project, program, activity or a written commitment is included in the SIP; EPA has approved an opt-in to the program, EPA has promulgated the program, or the Clean Air Act requires the program (indicate applicable date). Discuss the implementation status of these programs and the associated emissions credit for each analysis year.		
§93.122 (a)(4,5,6)	For nonregulatory measures that are not included in the STIP, include written commitments from appropriate agencies. Document that assumptions for measures outside the transportation system (e.g. fuels measures) are the same for baseline and action scenarios. Document that factors such as ambient temperature are consistent with those used in the SIP unless modified through interagency consultation.	N/A	N/A
§93.122 (b)(1)(i) ⁱⁱ	Document that a network-based travel model is in use that is validated against observed counts for a base year no more than 10 years before the date of the conformity determination. Document that the model results have been analyzed for reasonableness and compared to historical trends and explain any significant differences between past trends and forecasts (for per capita vehicle-trips, VMT, trip lengths mode shares, time of day, etc.).	Ch. 2	2014 RTP/2015 FTIP Ch. 2
§93.122 (b)(1)(ii) ²	Document the land use, population, employment, and other network-based travel model assumptions.	Ch. 2	2014 RTP/2015 FTIP Ch. 2
§93.122 (b)(1)(iii) ²	Document how land use development scenarios are consistent with future transportation system alternatives, and the reasonable distribution of employment and residences for each alternative.	Ch. 2	2014 RTP/2015 FTIP Ch. 2
§93.122 (b)(1)(iv) ²	Document use of capacity sensitive assignment methodology and emissions estimates based on a methodology that differentiates between peak and off-peak volumes and speeds, and bases speeds on final assigned volumes.	Ch. 2	2014 RTP/2015 FTIP Ch. 2
§93.122 (b)(1)(v) ²	Document the use of zone-to-zone travel impedances to distribute trips in reasonable agreement with the travel times estimated from final assigned traffic volumes. Where transit is a significant factor, document that zone-to-zone travel impedances used to distribute trips are used to model mode split.	Ch. 2	2014 RTP/2015 FTIP Ch. 2
§93.122 (b)(1)(vi) ²	Document how travel models are reasonably sensitive to changes in time, cost, and other factors affecting travel choices.	Ch. 2	2014 RTP/2015 FTIP Ch. 2
§93.122 (b)(2) ²	Document that reasonable methods were used to estimate traffic speeds and delays in a manner sensitive to the estimated volume of travel on each roadway segment represented in the travel model.	Ch. 2	2014 RTP/2015 FTIP Ch. 2
§93.122 (b)(3) ²	Document the use of HPMS, or a locally developed count-based program or procedures that have been chosen through the consultation process, to reconcile and calibrate the network-based travel model estimates of VMT.	Ch. 2	2014 RTP/2015 FTIP Ch. 2
§93.122	In areas not subject to §93.122(b), document the	Ch. 2	2014 RTP/2015 FTIP Ch. 2

MCTC 2015 Conformity Analysis: 2008 Ozone and 2012 PM2.5

40 CFR	Criteria	Page	Comments
(d)	continued use of modeling techniques or the use of appropriate alternative techniques to estimate vehicle miles traveled		
§93.122 (e, f)	Document, in areas where a SIP identifies construction-related PM10 or PM2.5 as significant pollutants, the inclusion of PM10 and/or PM2.5 construction emissions in the conformity analysis.	N/A	2014 RTP/2015 FTIP Ch. 3
§93.122 (g)	If appropriate, document that the conformity determination relies on a previous regional emissions analysis and is consistent with that analysis.	E.S., Ch. 2, Ch. 5	N/A
§93.126, §93.127, §93.128	Document all projects in the TIP/RTP that are exempt from conformity requirements or exempt from the regional emissions analysis. Indicate the reason for the exemption (Table 2, Table 3, traffic signal synchronization) and that the interagency consultation process found these projects to have no potentially adverse emissions impacts.	Ch. 2, App B	2014 RTP/2015 FTIP Ch. 2, App B

ⁱ Note that some areas are required to complete both interim emissions tests.

ⁱⁱ 40 CFR 93.122(b) refers only to serious, severe and extreme ozone areas and serious CO areas above 200,000 population

Disclaimers

This checklist is intended solely as an informational guideline to be used in reviewing Transportation Plans and Transportation Improvement Programs for adequacy of their conformity documentation. It is in no way intended to replace or supersede the Transportation Conformity regulations of 40 CFR Parts 51 and 93, the Statewide and Metropolitan Planning Regulations of 23 CFR Part 450 or any other EPA, FHWA or FTA guidance pertaining to transportation conformity or statewide and metropolitan planning. This checklist is not intended for use in documenting transportation conformity for individual transportation projects in nonattainment or maintenance areas. 40 CFR Parts 51 and 93 contain additional criteria for project-level conformity determinations. **Document #46711**

APPENDIX B

TRANSPORTATION PROJECT LISTING

MCTC 2015 Conformity Analysis: 2008 Ozone and 2012 PM2.5

Federally-Funded Non-Regionally Significant Project Listing

Jurisdiction/Agency	TIP/RTP	CTIPs Project ID (if available)	Description			Estimated Cost	Conformity Analysis Year (project open to traffic)										
	Project ID		Type of Improvement	Facility Name/Route	Project Limits		2017	2020	2021	2023	2025	2031	2035	2040			

MCTC 2015 Conformity Analysis: 2008 Ozone and 2012 PM2.5

Jurisdiction/Agency	TIP/RTP Project ID	CTIPs Project ID (if available)	Description			Estimated Cost	Exemption Code (per CTIPs - next sheet)
CALTRANS	MAD406002	22100000133	SHOPP - Collision Reduction			\$3,673,000	1.10
CALTRANS	MAD418003	12100000238	CA Route 99 Bridge Enhancements	Aesthetic Bridge Enhancements		\$752,000	4.12
CHOWCITY	MAD313036	22100000295	CATX	Operating Assistance		\$1,321,000	2.01
CHOWCITY	MAD302054	22100000293	Monterey Ave	3rd to 13th Street	Construct Pedestrian Facilities	\$229,000	3.02
CHOWCITY	MAD302048	22100000203	School	Various	Construct Pedestrian Facilities	\$511,000	3.02
CHOWCITY	MAD302052	22100000252	Chowchilla	Roberson Blvd District	Pave alleys	\$352,000	1.10
CHOWCITY	MAD302053	22100000289	Ave 24 1/2	Various	Shoulder Paving	\$300,000	1.04
CHOWCITY	MAD302047	22100000202	CATX	Operating Assistance		\$44,000	2.01
MADCITY	MAD213091	22100000302	DAR	Operating Assistance		\$3,588,000	2.01
MADCITY	MAD213092	22100000303	MAX	Operating Assistance		\$4,014,000	2.01
MADCITY	MAD213093	22100000304	Intermodal Center	Operating Assistance		\$320,000	2.01
MADCITY	MAD202069	22100000284	Tulare St, Cleveland, Raymond Rd	Fresno River to City Limits via Cleveland and Raymond	Class I, II Bicycle Facilities	\$332,000	3.02
MADCITY	MAD202046	22100000160	Fresno River Trail	Gateway & UPRR	Construct Bike/Ped Undercrossing	\$534,000	3.02
MADCITY	MAD202068	22100000283	Madera	Purchase and Install 1 CNG Compressor	Fleet Conversion	\$338,000	4.12
MADCITY	MAD202063	22100000245	Cleveland	Schnoor	Dual Left Turn Lanes	\$341,000	1.19
MADCITY	MAD202065	22100000247	Rotary Area Park	Various Locations	Construct Pedestrian Facilities	\$315,000	3.02
MADCITY	MAD202066	22100000248	Fresno River Trail - Laurel Street	Laurel Street	Construct Class I Bike Path	\$268,000	3.02
MADCITY	MAD202072	22100000284	Raymond Road	Raymond Road	Shoulder Paving, Curb and Gutter	\$304,000	1.04
MADCITY	MAD202074	22100000315	Cleveland Avenue	Granada Avenue to Schnoor Avenue	Construct Bike/Ped Facilities	\$379,000	3.02
MADCITY	MAD202075	22100000316	Alley "D" and Siera	Alley Walkway between "D" Street and Sierra Street	Construct Pedestrian Facilities	\$140,000	3.02
MADCITY	MAD213094	22100000321	MAX Preventative Maintenance	Operating Assistance		\$670,000	2.01
MADCO	MAD102066	22100000313	Childrens Blvd and Peck	Intersection of Childrens Boulevard and Peck	Install Traffic Signal	\$373,000	5.02
MADCO	MAD102065	22100000312	Northbound Road 28	Intersection of Road 28 and Avenue 14 1/2	Left Turn Lane	\$564,000	1.07
MADCO	MAD102064	22100000311	Road 39 and Avenue 12 1/2	Road 39 and Avenue 12 1/2	Install Traffic Signal	\$263,000	5.02
MADCO	MAD102063	22100000310	Avenue 15	Road 29 to Road 36	Shoulder Paving	\$1,017,000	1.04
MADCO	MAD102056	22100000242	Road 30	Avenue 12 to 500 ft. north	Shoulder Paving, Curb and Gutter	\$72,000	1.04
MADCO	MAD102046	22100000161	Avenue 15	SR 41 to Road 36	Shoulder Paving	\$895,000	1.04
MADCO	MAD113041	22100000298	MCC	Operating Assistance		\$1,991,000	2.01
MADCO	MAD102059	22100000249	Road 225	Creek Dr to Road 228	Construct Pedestrian Facilities	\$182,000	3.02
MADCO	MAD102045	22100000156	Road 426	SR 41 to Road 427	Construct Pedestrian Facilities	\$191,000	3.02
MADCO	MAD102061	22100000288	Ave 9	Road 23 to Road 23 1/2	Shoulder Paving	\$99,000	1.04
MADCO	MAD102060	22100000286	Road 23	Ave 8 1/2 to Ave 9 1/2	Shoulder Paving	\$187,000	1.04
MADCO	MAD102057	22100000243	Road 406	Road 400 to 2.5 miles east	Pave dirt roads	\$497,000	1.03
MCTC	MAD517005	12100000065	Planning, Programming and Monitoring			\$600,000	4.01
VAR AGENCIES	MAD410001	22100000036	Caltrans - Highway Bridge Program (HBP) - various locations			\$5,540,000	1.19
VAR AGENCIES	MAD419004	22100000039	Highway Safety Improvement Program (HSIP) - Lump sum program			\$313,000	1.06

APPENDIX C

CONSULTATION CORRESPONDENCE

July 15, 2015

TO: IAC Partners

CC: SJV MPO Staff & Directors

RE: 2015 Conformity Demonstration for the 2008 Ozone and 2012 PM2.5 Standards for IAC

The purpose of this memo is to transmit the proposed procedures and documentation for the 2015 Conformity Demonstration addressing the 2008 Ozone Standard and the 2012 PM2.5 standards for Interagency Consultation. Transportation network development and conformity analysis is scheduled to be completed in July, 2015. Public review of the 2015 Conformity Demonstration is anticipated to occur also in August/September, followed by MPO adoption in October, 2015. The 2015 Conformity Demonstration for the 2015 FTIP/2014 RTP (as amended if applicable) will be submitted in October for Federal approval to be issued on or before December 31, 2015.

On January 13, 2015, EPA released its proposed *Approval of San Joaquin Valley Plan and Supplement for the 2006 PM2.5 Standard and Proposed Reclassification to Serious for the 2006 PM2.5 Standard*. The proposed approval and reclassification has not been finalized. As a result this document describes two options for the primary and secondary 2006 24-hour PM2.5 standard. Option 1: the proposed approval and reclassification is effective (inclusive of transportation conformity budgets) and Option 2: the proposed approval and reclassification is not effective (inclusive of transportation conformity budgets).

On March 23, 2015, EPA released its *Proposed Rule for Implementing National Ambient Air Quality Standards for Fine Particles*. The implementation rule proposes three options, one of which could revoke the primary 1997 annual PM2.5 standard, while maintaining the secondary 1997 annual PM2.5 standard. The proposed implementation rule has not been finalized. As a result, this document describes two options for the 1997 annual PM2.5 standards. Option 1: the final implementation rule revoking the primary 1997 annual PM2.5 standard is effective prior to MPO board adoption (anticipated October 2015) and Option 2: the proposed implementation rule is not effective prior to MPO board adoption.

Please provide any comments on the proposed approach by COB, Monday, July 20, 2015. **It is requested that EPA and FHWA also provide concurrence.** An interagency consultation conference call will be scheduled upon request.

REQUIREMENTS

Ozone

EPA designated the San Joaquin Valley nonattainment area for the 2008 Ozone Standard, effective July 20, 2012. Transportation conformity applies one year after the effective date (July 20, 2013). Federal approval for the eight SJV MPO's 2008 Ozone standard conformity demonstrations was received on July 8, 2013. [KERN ONLY: In addition, the Eastern portion of Kern County, the Mohave Desert, was designated nonattainment and classified Marginal with an attainment date of 2014. It is important to note that the 2014 analysis year is not within the timeframe of the plan.]

EPA's final rule implementing the 2008 Ozone Standard also revoked the 1997 Ozone Standard for transportation conformity purposes. This revocation became effective April 6, 2015. The final rule also shifted the San Joaquin Valley 2008 Ozone Standard attainment date from December 31, 2032 to July 20, 2032; the new attainment year of 2031 must be modeled.

The San Joaquin Valley has an EPA approved 2007 Ozone Plan (as revised in 2011) that contains sub-area budgets for ROG and NOx. [KERN ONLY: In addition, EPA published a Notice of Adequacy for the 8-hour Ozone early Progress Plans for Eastern Kern County.] In accordance with EPA guidance dated July 2012, if a 2008 Ozone area has adequate or approved SIP budgets that address the 1997 standards, it must use the budget test until 2008 Ozone standard budgets are found adequate or approved.

When using the budget test, the attainment year of the 2008 ozone standard must be analyzed (e.g. 2031). In addition, in areas that have budgets for a previous ozone standard, consistency with those budgets must also be determined. The new attainment year of 2031 must be modeled.

PM2.5

On January 13, 2013, EPA issued a final rule strengthening the primary 1997 Annual PM2.5 standard to 12 micrograms per cubic meter; maintained the 1997 24-hour PM Standards and secondary 1997 annual PM2.5 standard; and maintained the primary and secondary 2006 24-hour PM2.5 standards, effective March 18, 2013. Conformity applies to all standards.

1997 Annual and 24-hour PM2.5 Standards

On March 23, 2015, EPA released its *Proposed Rule for Implementing National Ambient Air Quality Standards for Fine Particles*. The implementation rule proposes three options, one of which could revoke the primary 1997 annual PM2.5 standard, while maintaining the secondary 1997 annual PM2.5 standard. The proposed implementation rule has not been finalized and it is not clear if the standard will be revoked. Note that a revocation of the 1997 primary annual PM2.5 standard will not remove the obligation to demonstrate conformity for the 1997 24-hour PM2.5 standards. As a result, this document describes two options for the 1997 PM2.5 standards.

Option 1: Final Implementation Rule Revoking the Primary 1997 Annual PM2.5 Standard is Finalized and Effective

Under Option 1, conformity to the primary 1997 annual PM2.5 standard will no longer apply, however, conformity to the 1997 24-hour PM2.5 standard would continue to apply.

The San Joaquin Valley has an approved 2008 PM2.5 Plan (as revised in 2011) addressing both versions of the 1997 annual and 24-hour PM2.5 standards that contains sub-area budgets for PM2.5 and NOx. The applicable conformity test is the emissions budget test. The conformity budgets from Table 5 of the November 9, 2011 Federal Register will be used to demonstrate conformity to the 1997 24-hour PM2.5 standard

Option 2: Final Implementation Rule Revoking the Primary 1997 Annual PM2.5 Standard is Not Finalized and Effective

Under Option 2, conformity to the primary 1997 annual PM2.5 standard will continue to apply.

The San Joaquin Valley has an approved 2008 PM2.5 (1997 Standard) Plan (as revised in 2011) addressing both versions of the 1997 PM2.5 standards that contains sub-area budgets for PM2.5 and NOx. The applicable conformity test is the emissions budget test. The conformity budgets from Table 5 of the November 9, 2011 Federal Register will be used to demonstrate conformity to both 1997 annual and 24-hour PM2.5 standards.

2006 24-Hour PM2.5 Standards

On January 13, 2015, EPA released its proposed *Approval of San Joaquin Valley Plan and Supplement for the 2006 PM2.5 Standard and Proposed Reclassification to Serious for the 2006 PM2.5 Standard*. In addition, new transportation conformity budgets for the 2006 primary and secondary 24-hour PM2.5 standards are proposed to be approved. At this time, EPA has not finalized the proposed approval of the Plan (including conformity budgets) and reclassification. As a result, this document describes two options to demonstrate conformity for the 2006 24-hour PM2.5 standards.

Option 1: EPA Proposed Approval and Reclassification is Finalized and Effective

Under Option 1, the San Joaquin Valley will have approved sub-area budgets for PM2.5 and NOx for the 2006 24-hour PM2.5 standards. Thus, the San Joaquin Valley MPOs will conduct conformity determinations for the new subarea emission budgets as established in the Plan and as published in the final Federal Register. Due to “Serious” reclassification, a new attainment year of 2019 must be modeled.

Option 2: EPA Proposed Approval and Reclassification is Not Finalized Nor Effective

Under Option 2, the new sub-area budgets for PM2.5 and NOx for the 2006 24-hour PM2.5 standards will not be available for use and the 2008 PM2.5 Plan (1997 Standard) conformity budgets will continue to apply.

The San Joaquin Valley has an approved 2008 PM2.5 (1997 Standard) Plan (as revised in 2011) that contains sub-area budgets for PM2.5 and NOx. In accordance with the EPA Interim Transportation Conformity Guidance for 2006 PM2.5 NAAQS Nonattainment areas, if a 2006 PM2.5 area has adequate or approved SIP budgets that address the 1997 standards, it must use the budget test until new 2006 PM2.5 standard budgets are found adequate or approved.

2012 Annual PM2.5 Standards

EPA designated the San Joaquin Valley as nonattainment for the 2012 PM2.5 standards on January 15, 2015, effective April 15, 2015. Transportation conformity applies one year after the effective date (April 15, 2016). It is important to note that the 2012 annual PM2.5 nonattainment area boundary for the San Joaquin Valley is exactly the same as the nonattainment area boundary for the 1997 and 2006 standards.

In accordance with Section 93.109(i)(3) of the federal transportation conformity rule, if a 2012 PM2.5 area has adequate or approved SIP budgets that address the annual 1997 standards, it must use the budget test until new 2012 PM2.5 standard budgets are found adequate or approved. A new attainment year of 2021 will be modeled.

When using the budget test, the attainment year of the 2012 annual PM2.5 standard must be analyzed (e.g. 2021). In addition, in areas that have approved or adequate budgets for the 1997 annual PM2.5 standard, consistency with those budgets must also be determined. The attainment year of 2021 must be modeled.

PROPOSED APPROACH

The 2015 Conformity Demonstration for the 2008 Ozone and 2012 PM2.5 standards will be based on the federally approved 2014 RTP/2015 FTIP Conformity Analysis with updates as appropriate. The interagency consultation process for the 2014 RTP/2015 FTIP and corresponding conformity analysis began in September 2013 and is documented in the current federally approved conformity analysis. A summary of the major elements of the conformity document are provided below for review, comment, and concurrence. It is requested that any comments on the proposed approach be provided by COB, July 20, 2015. **It is requested that EPA and FHWA also provide concurrence.** As noted above, an interagency consultation conference call will be scheduled upon request.

In general, it is assumed that some SJV MPOs will not be processing a concurrent regionally significant amendment with the 2015 Conformity Demonstration. The following proposed

approach applies to all SJV MPOs for the 2015 Conformity Demonstration for the 2008 Ozone and 2012 PM2.5 standards. Clarification “NOTES” have been added to Item 3 (Procedures for Regional Emission Estimates) and Item 6 (Conformity Documentation) specific for an MPO that will be processing a concurrent regionally significant amendment.

1. Latest Planning Assumptions and Transportation Modeling: There have been no official updates to the socioeconomic projections used by the Valley MPOs transportation models since the 2014 RTP/2015 FTIP Conformity Analysis. In accordance with Section 93.110 of the federal conformity rule, the most recent estimates of population and employment projections that have been officially approved by the Metropolitan Planning Organization will be used. In addition, there have been no official updates to the Valley MPO transportation models since the 2014 RTP/2015 FTIP Conformity Analysis. The same traffic modeling and networks will be utilized for this 2015 Conformity Demonstration, except for the new attainment years of 2021 for the 2012 PM2.5 Standards and 2031, which replaces the 2032 attainment year for the 2008 Ozone Standard. (Note: If EPA approval of the SJV Supplement for the 2006 24-hour PM2.5 Standard and Reclassification is finalized, then the new attainment year of 2019 will also be modeled.)
2. Air Quality Modeling: While ARB has released EMFAC 2014, it has not been approved by EPA for use in conformity analyses. As a result, in accordance with Section 93.111 the latest emission estimation model (EMFAC 2011) will be used in this 2015 Conformity Demonstration. The EPA approved methodology for updating the default vehicle activity data will also be used consistent with the 2014 RTP/2015 FTIP Conformity Analysis.
3. Procedures for Regional Emissions Estimates: All SJV MPOs will develop a new 2031 attainment year transportation network for the 2008 Ozone Standard and a new 2021 attainment year for the 2012 PM2.5 standards using the currently approved latest planning assumptions and transportation models in support of the 2015 Conformity Demonstration. (Note: If EPA approval of the SJV Supplement for the 2006 24-hour PM2.5 Standard and Reclassification Document is finalized, then the new attainment year of 2019 will also be modeled.) The resulting transportation data (VMT by speed bin) will be processed using the 2014 RTP/2015 FTIP conformity procedures; interagency consultation was conducted on these procedures in September 2013. The following updates will be used for the 2015 Conformity Demonstration:
 - a. Updated 2014 RTP/2015 FTIP Conformity EMFAC Spreadsheet: updated attainment years for the 2008 Ozone standard, 2006 24-hour PM2.5 (if applicable) and 2012 Annual PM2.5 Standards.

- b. Updated 2014 RTP/2015 FTIP Totals Spreadsheet: new demonstration for 2008 Ozone, 2006 24-hour PM2.5 (if applicable), and 2012 annual PM2.5 standards.

NOTE: for those MPOs processing a concurrent regionally significant amendment, the entire 2014 RTP/2015 FTIP analysis will be revised using the same conformity procedures in addition to the updated information provided above for the 2015 Conformity Demonstration.

4. Transportation Control Measures: As part of the 2015 Conformity Demonstration for 2008 Ozone and 2012 PM2.5 Standards, the SJV MPOs will update the Project TID table and RACM TID table contained in Appendix D of the federally approved 2014 RTP/2015 FTIP (as amended, if applicable). Since there is no “new” RTP development with this 2015 Conformity Demonstration, there will be no update with respect to the inclusion of additional long-range local government control measures.
5. Conformity Documentation: A modified draft boilerplate document will be prepared to address the 2015 Conformity demonstration for 2008 Ozone and 2012 PM2.5 Standards. The following updates will be included:
 - a. Update Table 1-3 to include updated attainment years of 2019 (if applicable), 2021 and 2031 respectively.
 - b. Update Table 2-1 to include traffic data for new attainment years 2019 (if applicable), 2021 and updated attainment year 2031.
 - c. Update Table 5-1 to include 2008 Ozone standard, 2012 annual PM2.5 standards, and 2006 24-hour PM2.5 standards (if applicable) conformity demonstrations. Note that Table 5-1 of the Conformity Analysis for the 2014 RTP/2015 FTIP includes a conformity demonstration for the 1997 24-hour and annual PM2.5 standards.
 - d. Update Appendix B:
 - i. reflect any amendments processed to date for the Exempt Project Listing, and
 - ii. include 2019 (if applicable) and 2021 attainment years and replace 2032 with the new 2031 attainment year for the Regionally Significant Project List.
 - e. Update Appendix C:
 - i. Updated 2014 RTP/ 2015 FTIP Conformity EMFAC Spreadsheet
 - ii. Updated 2014 RTP/ 2015 FTIP Conformity Totals Spreadsheet
 - f. Update Appendix D:
 - i. Project TID table
 - ii. RACM TID table
 - g. Update Appendix E:
 - i. Notice of Public Meeting/Hearing
 - ii. Draft Adoption Resolution

In addition, the documentation will indicate the following: In accordance with Section 93.122(g) of the conformity rule, the 2015 Conformity Demonstration for 2008 Ozone and 2012 PM2.5 Standards will rely on the federally approved previous emissions analysis for carbon monoxide (NOTE: Kings, Madera, Merced, Tulare delete CO reference), PM-10, the 1997 24-hour and annual PM2.5 standards, and the 2006 24-hour PM2.5 standards (unless new budgets are finalized and effective). The 2014 RTP/2015 FTIP (as amended if applicable) and corresponding conformity analysis was federally approved on December 15, 2014. For this 2015 Conformity Demonstration, there are:

- No revisions to the TIP/RTP, including no additions or deletions of regionally significant projects,
- No changes in the design concept and scope of existing regionally significant projects, that require a new regional emissions analysis,
- No revisions that delay or accelerate the completion of regionally significant projects across conformity analysis years, and
- No changes to the time frame of the transportation plan.

In accordance with Section 93.108, the [INSERT AGENCY] MPO re-affirms that the 2015 TIP and 2014 RTP (as amended if applicable) are fiscally constrained with DOT's metropolitan planning regulations at 23 CFR Part 450.

NOTE: **for those MPOs processing a concurrent regionally significant amendment**, the entire 2014 RTP/2015 FTIP Conformity Analysis document (federally approved December 2014) will be revised *using track changes* to incorporate both the amendment and the updated information provided above for the 2015 Conformity Demonstration for 2008 Ozone and 2012 PM2.5 Standards..

Please contact me if you have questions or need additional information. Comments are due by COB, Monday, July 20, 2015.

ADDITIONAL REFERENCES:

EPA, 2012. Guidance for Transportation Conformity Implementation in Multi-Jurisdictional Nonattainment and Maintenance Areas. U.S. Environmental Protection Agency. EPA-420-B-12-046. July 2012.

EPA, 2015. Implementation of the 2008 National Ambient Air Quality Standards for Ozone: State Implementation Plan Requirements. Final Rule. U.S. Environmental Protection Agency. Vol. 80. No. 44. March 6, 2015.

EPA, 2015. Fine Particulate Matter National Ambient Air Quality Standards: State Implementation Plan Requirements. Proposed Rule. U.S. Environmental Protection Agency. Vol. 80. No. 55. March 23, 2015.

APPENDIX D

Conformity Analysis for the 2008 Ozone and 2012 PM2.5 Standards DOCUMENTATION

2015 Conformity Results Summary -- MADERA

Pollutant	Scenario	Emissions Total		DID YOU PASS?		
		ROG (tons/day)	NOx (tons/day)	ROG	NOx	
2008 Ozone Standards	2017 Budget	2.2	5.8			
	2017	1.3	5.1	YES	YES	
	2020 Budget	2.0	4.7			
	2020	1.1	3.8	YES	YES	
	2023 Budget	1.9	3.6			
	2023	1.0	2.8	YES	YES	
	2031	1.0	2.7	YES	YES	
	2040	1.0	2.9	YES	YES	
2012 PM2.5 Standards	2014 Budget	0.3	8.1			
	2017	0.2	5.4	YES	YES	
	2014 Budget	0.3	8.1			
	2021	0.2	3.5	YES	YES	
	2014 Budget	0.3	8.1			
	2025	0.2	2.8	YES	YES	
	2014 Budget	0.3	8.1			
	2035	0.2	2.9	YES	YES	
	2014 Budget	0.3	8.1			
	2040	0.2	3.0	YES	YES	

APPENDIX E

**TIMELY IMPLEMENTATION DOCUMENTATION
FOR TRANSPORTATION CONTROL MEASURES**

DRAFT MCTC 2015 Conformity Analysis: 2008 Ozone and 2012 PM2.5

RACM Commitment	Agency	Commitment Description	Commitment Schedule	Commitment Funding	TIP	TIP Project ID	Project Description	Implementation Status	2016 Conformity Update
								(as of 5/14)	(as of 5/15)
MA 3.1	MCTC	Commute Solutions		Funding is allocated through the annual budget process.			MCTC agrees to act as an information resource for employers within Madera County for the Commute Solutions Program. MCTC will promote the program by providing information to employers with fifty or greater employees on an annual basis.	The Commute Solutions Program is not programmed in the TIP. MCTC expanded public outreach by developing a newsletter, which has regular articles documenting the benefits of alternative commuting methods. MCTC continues to provide commute solutions information through the Public Awareness Program. In November of 2010 MCTC joined the California Vanpool Authority as a sponsor of the CalVans program.	MCTC continues to provide commute solutions information through the Public Awareness Program.
MA 14.1 (MA 11.2, MA 11.6, MA 13.3, 13.4, TCM3,)	MCTC	Area wide Public Awareness Programs		Funding is allocated through the annual budget process and documented in MCTC's OWP. \$40,000 will be budgeted for the first year of implementation.			MCTC agrees to expand public outreach by implementation of this measure through a new work element entitled "Public Awareness Program." This program will be developed during the first year of implementation and will include the following activities: Development of public outreach tools (i.e., website, newsletter, etc.); Rideshare promotion; Providing resources for the Commute Solutions program to employers; Promotion of alternative modes of transportation (i.e., bicycle, pedestrian, transit, and rail); Encouraging telecommuting and the use of teleconferencing; Encouraging other emission reduction behavior modifications (i.e., voluntary limiting of idling, engine retrofits, and implementation of incentive programs). This measure is an expansion of previous accomplishments through participation in the Rideshare Program with COFCG.	Public awareness programs are not programmed in the TIP. MCTC expanded public outreach by developing a newsletter and website. MCTC developed a Public Participation Plan, which was approved in May 2004 and last updated in June of 2015. The MCTC Public Awareness Program is an ongoing annual program.	The MCTC Public Awareness Program is an ongoing annual program.
MA 5.2	City of Madera	Cleveland Avenue	not specified	not specified	2002	MAD217004	In City of Madera, reconstruct & widen existing 2 lane street to provide raised median, bike lane, sidewalks, & install 2 traffic signals.	The City of Madera reviews its signal systems (4 or more contiguous in accordance with the FTP CMAQ programming cycle). Signal coordination is not warranted on Cleveland Ave. at this time. Project Completed November 2005.	The City of Madera reviews its signal systems (4 or more contiguous in accordance with the FTP CMAQ programming cycle). Signal coordination is not warranted on Cleveland Ave. at this time. Complete
		Gateway Drive, coordinate five signals	not specified	not specified	2002	MAD202045	In Madera, Gateway Drive from 4th Street to Olive Avenue; signal coordination		
MA 5.9	City of Madera	Bus Pullouts in Curbs for passenger Loading	31-Mar-02	Funding is allocated through the annual budget process and through the regular project programming cycle.			Bus pullout project scheduled at intersection of W. Cleveland and N. Schnoor Avenues.	This project was not included in the TIP. The bus pullout project on the N.W. corner of Cleveland and Schnoor was locally funded and completed in June 2002.	Complete
ADDITIONAL PROJECTS IDENTIFIED									
MA3.5	MCTC	Preferential Parking for Carpools and Vanpools		Funding is allocated through the annual budget process.			Encourage the establishment of preferential parking for carpools and vanpools annually	The Preferential Parking Outreach Program is not programmed in the TIP. The MCTC website has featured articles documenting the benefits of alternative commuting methods. MCTC continues to provide Preferential Parking, Vanpool, and Carpool information through the Public Awareness Program.	MCTC continues to provide Preferential Parking, Vanpool, and Carpool information through the Public Awareness Program.
MA3.9	MCTC	Encourage merchants and employers to subsidize the cost of transit for employees		Funding is allocated through the annual budget process.			Provide outreach services annually	The Preferential Parking Outreach Program is not programmed in the TIP. The MCTC website has featured articles documenting the benefits of alternative commuting methods. MCTC continues to provide Preferential Parking, Vanpool, and Carpool information through the Public Awareness Program.	MCTC continues to provide Transit Subsidy Information through the Public Awareness Program. In November of 2010 MCTC joined the California Vanpool Authority as a sponsor of the CalVans program.
MA5.3	City of Chowchilla	Reduce Traffic Congestion at Major Intersections		Local		N/A	Installed traffic signal at intersection of Robertson Blvd/SR 233 and 11th Street	Project Completed Summer 2007	Complete
MA9.3	City of Chowchilla	Bicycle/Pedestrian Program		Local		N/A	In Chowchilla, Class II Bike lane on Avenue 26 from Road 16 1/2 to Fig Tree Road	Project Completed September 2002	Complete
MA5.3	Madera County	Reduce Traffic Congestion at Major Intersections		Local		N/A	In Coarsegold, Installed traffic signal at Chukchansi Casino	Project Completed in 2002	Complete
				Local		N/A	In Madera Ranchos, Installed traffic signal at Road 36/Avenue 12	Project Completed in 2002.	Complete
				Local		N/A	In Oakhurst, Installed traffic signal at Road 427/Road 426	Project Completed in 2002.	Complete
				Local		N/A	Installed traffic signal at Road 200/SR 41	Project Completed November 2007.	Complete
				SHOPP		N/A	Installed traffic signals at SR 99/Ave 12	Project Completed in 2009.	Complete
				SHOPP		N/A	Installed traffic signal at SR 417/Osborne Springs Parkway	Project Completed in May 2009	Complete
				HSP		N/A	Installed traffic signal at Lanes Bridge Dr./Childrens Blvd	Project Completed August 2009.	Complete
				Local		N/A	Installed traffic signal at SR 41/Road 415	Project Completed September 2009.	Complete
				Local		N/A	Installed traffic signal and right through lane at SR 41/Road 200	Project Completed in 2010	Complete
				Local		N/A	Installed traffic signal at Avenue 12 and Road 36	Project Completed in 2011	Complete
				Local		N/A	Installed Signal in Madera County at Avenue 12 overcrossing	Project Completed in 2010	Complete
				Local		N/A	Installed Signal in Madera County just west of Avenue 12 overcrossing	Project Completed in 2013	Complete
				Local		N/A	Installed Signal in Madera County at James Rd and Childrens Blvd	Project Completed in 2012	Complete
MA9.3	Madera County	Bicycle/Pedestrian Program		Local		N/A	Class II bicycle lanes on Road 427	Project Completed July 2002	Complete
				Local		N/A	In Oakhurst, Constructed sidewalks on SR41	Project Completed January 2003	Complete
				Local		N/A	Constructed sidewalks on Road 26 at Ave 17	Project Completed January 2004	Complete
				Local		N/A	Class II Bicycle Lanes on RD 26 from Madera city limits to Ave 17	Project Completed November 2005	Complete
				Local		N/A	Constructed sidewalks on Road 36 at Ave 12	Project Completed September 2006	Complete
				Local		N/A	Class II Bicycle Lanes on Road 36 North of Ave 12	Project Completed September 2006	Complete
				Local		N/A	Constructed Bicycle Lanes and Pedestrian Walkways at Desmond and Nishimoto Schools in Madera county	Project Completed in 2011	Complete
				Local		N/A	In Oakhurst, Constructed sidewalks on Road 426	Project Completed in 2013	Complete
MA5.3	City of Madera	Reduce Traffic Congestion at Major Intersections		Local		N/A	In Madera, Installed traffic signal at Olive/Gateway	Project Completed June 2002	Complete
				Local		N/A	In Madera, Installed traffic signal at Olive/Stadium	Project Completed February 2004	Complete
				Local		N/A	In Madera, Installed traffic signal at Schnoor/Foxglove	Project Completed June 2004	Complete
				Local		N/A	In Madera, Installed traffic signal at Schnoor/Sunset		Complete
				Local		N/A	In Madera, traffic signal modifications at Stadium Rd./Pecan Ave.	Project Completed September 2008	Complete
				Local		N/A	In Madera, Installed traffic signal at Raymond Rd./Cleveland Ave.	Project Completed 2012	Complete
				Local		N/A	In Madera, Installed double left turn lanes at Cleveland and Schnoor	Project Completed 2013	Complete
MA9.3	City of Madera	Bicycle/Pedestrian Program		Local		N/A	Class I Bike Path- Fresno River Trail - Schnoor to Granada	Project completed in 2002	Complete
				Local		N/A	Class I Bike Path- Fresno River Trail - Granada to Westberry	Project completed in 2005	Complete
				Local		N/A	Class II Bike Lane - Cleveland Ave from Sharon to Raymond	Project completed in 2005	Complete
				Local		N/A	Class II Bike Lane - Stadium Road n/o Pecan	Project completed in 2005	Complete
				Local		N/A	Fresno River Trail Undercrossing at D & Lake Street	Project completed August 2008	Complete
				Local		N/A	Fresno River Trail Bike and Pedestrian Trail; Class I Bike and Undercrossing	Project completed in 2010	Complete
				Local		N/A	Schnoor Bridge Fresno River Trail	Project completed in 2012	Complete

DRAFT MCTC 2015 Conformity Analysis: 2008 Ozone and 2012 PM2.5

<u>RACM Commitment</u>	<u>Agency</u>	<u>Measure Title</u>	<u>Measure Description (not verbatim)</u>	<u>Implementation Status (as of 5/14)</u>	<u>2015 Conformity Update (as of 5/15)</u>
MA3.5	MCTC	Preferential Parking for Carpools and Vanpools	Encourage the establishment of preferential parking for carpools and vanpools annually	MCTC has an ongoing public awareness program that utilizes collaboration with member agencies and the MCTC Website. See Project TID Table.	The MCTC Public Awareness program is an ongoing annual program.
MA3.9	MCTC	Encourage merchants and employers to subsidize the cost of transit for employees	Provide outreach services annually	MCTC has an ongoing public awareness program that utilizes collaboration with member agencies and the MCTC Website. See Project TID Table.	The MCTC Public Awareness program is an ongoing annual program.
MA5.3	Chowchilla	Reduce Traffic Congestion at Major Intersections	Improve intersections projected to experience congestion	Chowchilla has not identified or implemented any Traffic Signal Projects since the date of the last report March 2012.	Chowchilla has not identified Traffic Signal Projects since the date of the last report May 2014.
MA9.3	Chowchilla	Bicycle/Pedestrian Program	Implement City Bike Plan	Chowchilla has not identified or implemented any Bike/Pedestrian projects since the date of the last report March 2012.	Chowchilla has not identified Bike/Pedestrian facility project since the date of last report May 2014.
MA5.3	Madera County	Reduce Traffic Congestion at Major Intersections	Improve intersections projected to experience congestion	The County has identified and implemented several traffic signal projects since 2002. See Project TID Table. The County identified and implemented a traffic signal project on SR 41. See Project TID Table.	The County has not identified and implemented two traffic signal projects since the date of the last report May 2014.
MA9.3	Madera County	Bicycle/Pedestrian Program	Implement County Bike Plan	The County has identified and implemented several bicycle and pedestrian facilities projects. See Project TID Table. The County identified and implemented two bicycle and pedestrian projects on Road 36. See Project TID Table.	The County has not identified and implemented one Bike/Pedestrian project since the date of the last report May 2014.
MA5.3	City of Madera	Reduce Traffic Congestion at Major Intersections	Continue intersection improvements to reduce traffic congestion at major intersections	Madera has identified and implemented several traffic signal projects since 2002. See Project TID Table. Traffic conditions are determined by staff using traffic counts, traffic flow, and accident history. Madera has identified and implemented a traffic signal project on Sunset Ave. See Project TID Table.	Madera has not identified and implemented a traffic signal modification projects since the date of last report May 2014.
MA9.3	City of Madera	Bicycle/Pedestrian Program	Implement City Bike Plan	Madera has not identified or implemented any Bike/Pedestrian facility projects since the date of last report March 2012.	Madera has not identified Bike/Pedestrian facility project since the date of last report May 2014.

APPENDIX F

PUBLIC MEETING PROCESS DOCUMENTATION

BEFORE
THE COMMISSIONERS OF THE MADERA COUNTY TRANSPORTATION COMMISSION
COUNTY OF MADERA, STATE OF CALIFORNIA

In the matter of)
MCTC 2015 CONFORMITY)
ANALYSIS FOR THE 2008 OZONE)
AND 2012 PM2.5 STANDARDS)

Resolution No. **15-10**

WHEREAS, the Madera County Transportation Commission is a Regional Transportation Planning Agency and a Metropolitan Planning Organization, pursuant to State and Federal designation; and

WHEREAS, federal planning regulations require Metropolitan Planning Organizations to prepare and adopt a long range Regional Transportation Plan (RTP) for their region; and

WHEREAS, federal planning regulations require that Metropolitan Planning Organizations prepare and adopt a Federal Transportation Improvement Program (FTIP) for their region; and

WHEREAS, a 2014 Regional Transportation Plan has been prepared in full compliance with federal guidance; and

WHEREAS, a 2014 Regional Transportation Plan has been prepared in accordance with state guidelines adopted by the California Transportation Commission; and

WHEREAS, federal planning regulations require that Metropolitan Planning Organizations prepare and adopt a short range Federal Transportation Improvement Program (FTIP) for their region; and

WHEREAS, the 2015 Federal Transportation Improvement Program (2015 FTIP) has been prepared to comply with Federal and State requirements for local projects and through a cooperative process between the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), the State Department of Transportation (Caltrans), principal elected officials of general purpose local governments and their staffs, and public owner operators of mass transportation services acting through the Madera County Transportation Commission forum and general public involvement; and

WHEREAS, the 2015 FTIP program listing is consistent with: 1) the 2014 Regional Transportation Plan; 2) the 2014 State Transportation Improvement Program; and 3) the 2015 Conformity Analysis for the 2008 Ozone and 2012 PM2.5 Standards; and

WHEREAS, the 2015 FTIP contains the MPO's certification of the transportation planning process assuring that all federal requirements have been fulfilled; and

WHEREAS, the 2015 FTIP meets all applicable transportation planning requirements per 23 CFR Part 450.

WHEREAS, projects submitted in the 2015 FTIP must be financially constrained and the financial plan affirms that funding is available; and

WHEREAS, the MPO must demonstrate conformity per 40 CFR Part 93 for the RTP and FTIP;
and

WHEREAS, the 2015 Conformity Analysis for the 2008 Ozone and 2012 PM2.5 Standards supports a finding that the 2015 FTIP and 2014 RTP meet the air quality conformity requirements for ozone and particulate matter; and

WHEREAS, the 2015 Conformity Analysis for the 2008 Ozone and 2012 PM2.5 Standards relies on the federally approved previous emissions analysis for PM-10 and PM2.5 (1997 24-hour and annual PM2.5 standards and the 2006 24-hour PM2.5 standards); and

WHEREAS, the 2014 RTP and 2015 FTIP [as amended, if necessary] do not interfere with the timely implementation of the Transportation Control Measures; and

WHEREAS, the 2014 RTP and 2015 FTIP conforms to the applicable SIPs; and

WHEREAS, the documents have been widely circulated and reviewed by Madera County Transportation Commission advisory committees representing the technical and management staffs of the member agencies; representatives of other governmental agencies, including State and Federal; representatives of special interest groups; representatives of the private business sector; and residents of Madera County consistent with public participation process adopted by Madera County Transportation Commission; and

WHEREAS, a public hearing was conducted on October 21, 2015 to hear and consider comments on the 2015 Conformity Analysis for the 2008 Ozone and 2012 PM2.5 Standards;

NOW, THEREFORE, BE IT RESOLVED, that Madera County Transportation Commission adopts the 2015 Conformity Analysis for the 2008 Ozone and 2012 PM2.5 Standards.

BE IT FURTHER RESOLVED, that the Madera County Transportation Commission finds that the 2014 RTP and 2015 FTIP are in conformity with the requirements of the Federal Clean Air Act Amendments and applicable State Implementation Plans for air quality.

THE FOREGOING RESOLUTION was passed and adopted by Madera County Transportation Commission this 21st day of October 2015.

Commissioner Wheeler voted: _____
Commissioner Rodriguez voted: _____
Commissioner Rogers voted: _____
Commissioner Poythress voted: _____
Commissioner Medellin voted: _____
Commissioner Ahmed voted: _____

**NOTICE OF PUBLIC MEETING ON THE
DRAFT 2015 CONFORMITY ANALYSIS FOR THE 2008 OZONE AND 2012 PM2.5
STANDARDS**

NOTICE IS HEREBY GIVEN that the Madera County Transportation Commission (MCTC) will hold a public meeting on October 21, 2015 at The MCTC offices located at 2001 Howard Road, Suite 201, Madera, Ca 93637 regarding the Draft 2015 Conformity Analysis for the 2008 Ozone and 2012 PM2.5 Standards. The purpose of this public meeting is to receive public comments on these documents.

- The 2015 Conformity Analysis for the 2008 Ozone and 2012 PM2.5 Standards contains the documentation to support a finding that the 2015 FTIP and 2014 meet the air quality conformity requirements for ozone and particulate matter.

Individuals with disabilities may call MCTC (with 3-working-day advance notice) to request auxiliary aids necessary to participate in the public hearing. Translation services are available (with 3-working-day advance notice) to participants speaking any language with available professional translation services.

A concurrent 30-day public review and comment period will commence on September 18, 2015 and conclude on October 21, 2015. The draft documents are available for review at the MCTC office, located at 2001 Howard Road, Suite 201, Madera, Ca 93637 and on the MCTC website at www.maderactc.org.

Public comments are welcomed at the meeting, or may be submitted in writing by 3:30 p.m. on October 21, 2015 to Dylan Stone at the address below.

After considering the comments, the documents will be considered for adoption, by resolution, by the MCTC at a regularly scheduled meeting to be held on October 21, 2015. The documents will then be submitted to state and federal agencies for approval.

Contact Person: Dylan Stone, Regional Planning Supervisor
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APPENDIX G

RESPONSE TO PUBLIC COMMENTS

This appendix will be compiled at the end of the public comment period.