
**CONFORMITY ANALYSIS
FOR THE 2023 FEDERAL TRANSPORTATION IMPROVEMENT
AND THE 2022 REGIONAL TRANSPORTATION PLAN**

AUGUST 31, 2022

MADERA COUNTY TRANSPORTATION COMMISSION
2001 HOWARD ROAD, SUITE 201
MADERA, CA 93637

www.maderactc.org

This report was funded in part through grant(s) from the Federal Highway Administration and Federal Transit Administration, U. S. Department of Transportation. The views and opinions of Madera County Transportation Commission expressed herein do not necessarily state or reflect those of the U.S. Department of Transportation

TABLE OF CONTENTS

EXECUTIVE SUMMARY1
 CONFORMITY REQUIREMENTS.....2
 CONFORMITY TESTS.....3
 RESULTS OF THE CONFORMITY ANALYSIS.....3
 REPORT ORGANIZATION4

CHAPTER 1: FEDERAL AND STATE REGULATORY REQUIREMENTS6
 A. FEDERAL AND STATE CONFORMITY REGULATIONS.....6
 B. CONFORMITY REGULATION REQUIREMENTS.....8
 C. AIR QUALITY DESIGNATIONS APPLICABLE TO THE SAN JOAQUIN VALLEY10
 D. CONFORMITY TEST REQUIREMENTS.....12
 E. ANALYSIS YEARS.....19

CHAPTER 2: LATEST PLANNING ASSUMPTIONS AND TRANSPORTATION MODELING.....22
 A. SOCIOECONOMIC DATA.....24
 B. TRANSPORTATION MODELING.....24
 C. TRAFFIC ESTIMATES.....31
 D. VEHICLE REGISTRATIONS.....32
 E. STATE IMPLEMENTATION PLAN MEASURES.....32

CHAPTER 3: AIR QUALITY MODELING34
 A. EMFAC2014.....35
 B. ADDITIONAL PM-10 ESTIMATES.....36
 C. PM2.5 APPROACH.....37
 D. SUMMARY OF PROCEDURES FOR REGIONAL EMISSIONS ESTIMATES40

CHAPTER 4: TRANSPORTATION CONTROL MEASURES.....41
 A. TRANSPORTATION CONFORMITY REGULATION REQUIREMENTS FOR TCMS.....41
 B. APPLICABLE AIR QUALITY IMPLEMENTATION PLANS.....43
 C. IDENTIFICATION OF 2002 RACM THAT REQUIRE TIMELY IMPLEMENTATION DOCUMENTATION44
 D. TCM FINDINGS FOR THE TIP AND REGIONAL TRANSPORTATION PLAN.....45
 E. RTP CONTROL MEASURE ANALYSIS IN SUPPORT OF 2003 PM-10 PLAN.....46

CHAPTER 5: INTERAGENCY CONSULTATION48
 A. INTERAGENCY CONSULTATION48
 B. PUBLIC CONSULTATION.....49

CHAPTER 6: TIP AND RTP CONFORMITY51

REFERENCES57

APPENDICES

Appendix A: Conformity Checklist

Appendix B: Transportation Project Listing

Appendix C: Conformity Analysis Documentation

Appendix D: Timely Implementation Documentation for Transportation Control Measures

Appendix E: Public Hearing Process Documentation

Appendix F: Response to Public Comments

TABLES

Table 1-1: On-Road Motor Vehicle 2008 and 2015 Ozone Standard Emissions Budgets..... 13
Table 1-2: On-Road Motor Vehicle PM-10 Emissions Budgets..... 14
Table 1-3: On-Road Motor Vehicle 1997 (24-hour and annual) PM2.5 Standard Emissions
Budgets 16
Table 1-4 On-Road Motor Vehicle 2006 24-Hour PM2.5 Standard Emissions Budgets..... 18
Table 1-5: On-Road Motor Vehicle 2012 (annual) PM2.5 Standard Emissions Budgets (Serious)
..... 19
Table 1-6: San Joaquin Valley Conformity Analysis Years 20
Table 2-1: Summary of Latest Planning Assumptions for the MCTC Conformity Analysis..... 23
Table 2-2: Traffic Network Comparison for Horizon Years Evaluated in Conformity Analysis 32
Table 2-3: 2007 PM-10 Maintenance Plan Measures Assumed in the Conformity Analysis 33
Table 6-1: Conformity Results Summary 54

EXECUTIVE SUMMARY

This report presents the Conformity Analysis for the 2023 Federal Transportation Improvement Program (2023 FTIP) and the 2022 Regional Transportation Plan (2022 RTP). The Madera County Transportation Commission is the designated Metropolitan Planning Organization (MPO) in Madera County, California, and is responsible for regional transportation planning.

The 2018 PM2.5 Plan addressing 1997, 2006 and 2012 PM2.5 standards was adopted by the San Joaquin Valley Air District on November 15, 2018 and California Air Resources Board on January 24, 2019 and subsequently submitted for EPA review. EPA issued final approval on 2018 PM2.5 SIP elements that pertain to 2006 24-hour PM2.5 standard serious area nonattainment on July 22, 2020. On November 26, 2021, EPA published final approval of the moderate area SIP budgets for the 2012 PM2.5 standard contained in the 2016 Moderate Area PM2.5 Plan and portions of the 2018 PM2.5 plan that pertain to the moderate requirements for the 2012 PM2.5 standard (effective December 27, 2021). Also on November 26, 2021, EPA partially disapproved the original SIP submittal dealing with 1997 annual PM2.5 nonattainment. In response, CARB submitted a 2021 SIP revision to the 2018 PM2.5 Plan demonstrating attainment by 2023. Then on January 28, 2022, EPA approved 2018 PM2.5 Plan portion dealing with the 1997 24-hour PM2.5 standard and determined that the SJV attained the standard by the December 31, 2020 deadline (effective February 28, 2022). On February 10, 2022, EPA found the 1997 annual PM2.5 budgets for attainment year 2023 adequate (effective February 25, 2022). Therefore, this conformity analysis incorporates new 2018 PM2.5 SIP budgets for the 2006 24-hour and 1997 annual and 24-hour PM2.5 standards.

The remaining components of the 2018 PM2.5 Plan addressing the 2012 PM2.5 serious nonattainment area requirements are currently undergoing EPA review. Should EPA act on these additional SIP elements, this conformity analysis includes an “upcoming budget test” to address conformity to the budgets anticipated to be available by end of this year.

The Clean Air Act Section 176(c) (42 U.S.C. 7506(c)) and U.S. Environmental Protection Agency (EPA) transportation conformity regulations (40 CFR 93 Subpart A) require that each new RTP and TIP be demonstrated to conform to the State Implementation Plan (SIP) before the RTP and TIP are approved by the MPO or accepted by the U.S. Department of Transportation (DOT). This analysis demonstrates that the criteria specified in the transportation conformity regulations for a conformity determination are satisfied by the 2023 FTIP and the 2022 RTP; a finding of conformity is therefore supported. The 2023 FTIP, the 2022 RTP, and the corresponding Conformity Analysis were approved by MCTC Policy Board on August 24, 2022. Federal approval is anticipated on or before December 31, 2022. FHWA/FTA last issued a finding of conformity for the 2021 FTIP and the 2018 RTP, as amended if applicable, on August 13, 2021.

The 2023 FTIP and the 2022 RTP have been financially constrained in accordance with the requirements of 40 CFR 93.108 and consistent with the U.S. DOT metropolitan planning

regulations (23 CFR Part 450). A discussion of financial constraint and funding sources is included in the appropriate documents.

The applicable Federal criteria or requirements for conformity determinations, the conformity tests applied, the results of the conformity assessment, and an overview of the organization of this report are summarized below.

CONFORMITY REQUIREMENTS

The Federal transportation conformity regulations (40 Code of Federal Regulations Parts 51 and 93) specify criteria and procedures for conformity determinations for transportation plans, programs, and projects and their respective amendments. The Federal transportation conformity regulation was first promulgated in 1993 by the U.S. EPA, following the passage of amendments to the Federal Clean Air Act in 1990. The Federal transportation conformity regulation has been revised several times since its initial release to reflect both EPA rule changes and court opinions. The transportation conformity regulation is summarized in Chapter 1.

The conformity regulation applies nationwide to “all nonattainment and maintenance areas for transportation-related criteria pollutants for which the area is designated nonattainment or has a maintenance plan” (40 CFR 93.102). Currently, the San Joaquin Valley (or portions thereof) is designated as nonattainment with respect to Federal air quality standards for ozone, and particulate matter under 2.5 microns in diameter (PM_{2.5}); and has a maintenance plan for particulate matter under 10 microns in diameter (PM-10). Therefore, transportation plans and programs for the nonattainment areas for Madera County area must satisfy the requirements of the Federal transportation conformity regulation. Note that the urbanized/metropolitan areas of Kern, Fresno, Stanislaus and San Joaquin Counties have attained the CO standard and maintained attainment for 20 years. In accordance with Section 93.102(b)(4), conformity requirements for the CO standard stop applying 20 years after EPA approves an attainment redesignation request or as of June 1, 2018. Therefore, future conformity analyses for the TIP and RTP no longer include a CO conformity demonstration.

Under the transportation conformity regulation, the principal criteria for a determination of conformity for transportation plans and programs are:

- (1) the TIP and RTP must pass an emissions budget test using a budget that has been found to be adequate by EPA for transportation conformity purposes, or an interim emission test;
- (2) the latest planning assumptions and emission models specified for use in conformity determinations must be employed;
- (3) the TIP and RTP must provide for the timely implementation of transportation control measures (TCMs) specified in the applicable air quality implementation plans; and
- (4) interagency and public consultation.

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 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. EPA, the California Air Resources Board (CARB) and Caltrans are also represented on the committee. The final determination of conformity for the TIP and RTP is the responsibility of FHWA, and FTA within the U.S. DOT.

FHWA has developed a Conformity Checklist (included in Appendix A) that contains the required items to complete a conformity determination. Appropriate references to these items are noted on the checklist.

CONFORMITY TESTS

The conformity tests specified in the Federal transportation conformity regulation are: (1) the emissions budget test, and (2) the interim emission test. For the emissions budget test, predicted emissions for the TIP/RTP must be less than or equal to the motor vehicle emissions budget specified in the approved air quality implementation plan or the emissions budget found to be adequate for transportation conformity purposes. If there is no approved air quality plan for a pollutant for which the region is in nonattainment or no emission budget has been found to be adequate for transportation conformity purposes, the interim emission test applies. Chapter 1 summarizes the applicable air quality implementation plans and conformity tests for ozone, PM-10, and PM2.5.

RESULTS OF THE CONFORMITY ANALYSIS

A regional emissions analysis was conducted for the years 2022, 2023, 2024, 2025, 2026, 2029, 2031, 2037 and 2046 for each applicable pollutant. All analyses were conducted using the latest planning assumptions and emissions models. The major conclusions of the Conformity Analysis for the 2023 FTIP and 2022 RTP are:

- For 2008 and 2015 8-hour ozone, the total regional on-road vehicle-related emissions (ROG and NOx) associated with implementation of the 2023 FTIP and the 2022 RTP all years tested are projected to be less than the approved emissions budgets specified in the *2018 Updates to the California State Implementation Plan for the San Joaquin Valley* (2018 SIP Update). The conformity tests for ozone are therefore satisfied.
- For PM-10, the total regional vehicle-related emissions (PM-10 and NOx) associated with implementation of the 2023 FTIP and the 2022 RTP for all years tested are either (1) projected to be less than the approved emissions budgets, or (2) less than the emission budgets using the approved PM-10 and NOx trading mechanism for transportation conformity purposes from the *2007 PM-10 Maintenance Plan (as revised in 2015)*. The conformity tests for PM-10 are therefore satisfied.
- For the 1997 24-hour PM2.5 standard, the total regional on-road vehicle-related emissions associated with implementation of the 2023 FTIP and the 2022 RTP for the analysis years are

either (1) projected to be less than the approved emission budgets, or (2) less than the emission budgets using the approved PM_{2.5} and NO_x trading mechanism for transportation conformity purposes from the *2018 Plan for the 1997, 2006, and 2012 PM_{2.5} Standards (2018 PM_{2.5} Plan)* for the 1997 PM_{2.5} 24-hour serious area requirements (2020 attainment year). The conformity tests for the 1997 24-hour PM_{2.5} standard are therefore satisfied.

- For the 1997 annual PM_{2.5} standard, the total regional on-road vehicle-related emissions associated with implementation of the 2023 FTIP and the 2022 RTP for the analysis years are projected to be less than the adequate emission budgets from the 2021 revision to the *2018 Plan for the 1997, 2006, and 2012 PM_{2.5} Standards (2018 PM_{2.5} Plan)* for the 1997 annual PM_{2.5} serious area requirements (2023 attainment year). The conformity tests for the 1997 annual PM_{2.5} standard are therefore satisfied.
- For the 2006 24-hour PM_{2.5} standard, the total regional on-road vehicle-related emissions associated with implementation of the 2023 FTIP and the 2022 RTP for the analysis years are either (1) projected to be less than the approved emission budgets, or (2) less than the emission budgets using the approved PM_{2.5} and NO_x trading mechanism for transportation conformity purposes from the *2018 Plan for the 1997, 2006, and 2012 PM_{2.5} Standards (2018 PM_{2.5} Plan)*. The conformity tests for the 2006 PM_{2.5} standard are therefore satisfied.
- For the 2012 annual PM_{2.5} standard, the total regional on-road vehicle-related emissions associated with implementation of the 2023 FTIP and the 2022 RTP for the analysis years are either (1) projected to be less than the approved emission budgets, or (2) less than the emission budgets using the approved PM_{2.5} and NO_x trading mechanism for transportation conformity purposes from the *2016 Moderate PM_{2.5} SIP and 2018 Plan for the 1997, 2006, and 2012 PM_{2.5} Standards (2018 PM_{2.5} Plan)* for 2012 PM_{2.5} moderate area requirements. In addition, this conformity analysis includes an “upcoming budget test” demonstrating conformity to the serious (2025) budgets contained in the 2018 PM_{2.5} Plan. The conformity tests for the 2012 PM_{2.5} standard are therefore satisfied.

The 2023 FTIP and the 2022 RTP will not impede and will support timely implementation of the TCMs that have been adopted as part of applicable air quality implementation plans. The current status of TCM implementation is documented in Chapter 4 of this report. Since the local SJV procedures (e.g., Air District Rule 9120 Transportation Conformity) have not been approved by EPA, consultation has been conducted in accordance with Federal requirements.

REPORT ORGANIZATION

The report is organized into six chapters. Chapter 1 provides an overview of the applicable Federal and State conformity regulations and requirements, air quality implementation plans, and conformity test requirements. Chapter 2 contains a discussion of the latest planning assumptions and transportation modeling. Chapter 3 describes the air quality modeling used to estimate emission factors and mobile source emissions. Chapter 4 contains the documentation required under the Federal transportation conformity regulation for transportation control measures. Chapter 5 provides an overview of the interagency requirements and the general approach to compliance used by the San Joaquin Valley MPOs. The results of the conformity analysis for the TIP/RTP are provided in Chapter 6.

Appendix E includes public hearing documentation conducted on the 2023 FTIP, the 2022 RTP and the corresponding Conformity Analysis on July 20, 2022. Comments received on the conformity analysis and responses made as part of the public involvement process are included in Appendix F.

CHAPTER 1: FEDERAL AND STATE REGULATORY REQUIREMENTS

The criteria for determining conformity of transportation programs and plans under the Federal transportation conformity regulation (40 CFR Parts 51 and 93) and the applicable conformity tests for the San Joaquin Valley nonattainment areas are summarized in this section. The Conformity Analysis for and the 2023 FTIP and 2022 RTP was prepared based on these criteria and tests. Presented first is a review of the development of the applicable conformity regulation and guidance procedures, followed by summaries of conformity regulation requirements, air quality designation status, conformity test requirements, and analysis years for the Conformity Analysis.

The MCTC is the designated Metropolitan Planning Organization (MPO) for Madera County in the San Joaquin Valley. As a result of this designation MCTC prepares the TIP, RTP, and associated conformity analyses. The TIP serves as a detailed four-year (FY 2022/23 – 2025/26) programming document for the preservation, expansion, and management of the transportation system. The 2022 RTP has a 2046 horizon that provides the long-term direction for the continued implementation of the freeway/expressway plan, as well as improvements to arterial streets, transit, and travel demand management programs. The TIP and RTP include capacity enhancements to the freeway/expressway system commensurate with available funding.

A. FEDERAL AND STATE CONFORMITY REGULATIONS

CLEAN AIR ACT AMENDMENTS

Section 176(c) of the Clean Air Act (CAA, 1990) requires that Federal agencies and MPOs not approve any transportation plan, program, or project that does not conform to the approved State Implementation Plan (SIP). The 1990 amendments to the Clean Air Act expanded Section 176(c) to more explicitly define conformity to an implementation plan to mean:

“Conformity to the plan's purpose of eliminating or reducing the severity and number of violations of the national ambient air quality standards and achieving expeditious attainment of such standards; and that such activities will not (i) cause or contribute to any new violation of any standard in any area; (ii) increase the frequency or severity of any existing violation of any standard in any area; or (iii) delay timely attainment of any standard or any required interim emission reductions or other milestones in any area.”

Section 176(c) also provides conditions for the approval of transportation plans, programs, and projects, and requirements that the Environmental Protection Agency (EPA) promulgate conformity determination criteria and procedures no later than November 15, 1991.

FEDERAL RULE

The initial November 15, 1991 deadline for conformity criteria and procedures was partially completed through the issuance of supplemental interim conformity guidance issued on June 7, 1991 for carbon monoxide, ozone, and particulate matter ten microns or less in diameter (PM-10). EPA subsequently promulgated the Conformity Final Rule in the November 24, 1993 *Federal Register* (EPA, 1993). The 1993 Rule became effective on December 27, 1993. The Federal Transportation Conformity Final Rule has been amended several times from 1993 to present. These amendments have addressed a number of items related to conformity lapses, grace periods, and other related issues to streamline the conformity process.

EPA published the Transportation Conformity Rule PM2.5 and PM10 Amendments on March 24, 2010; the rule became effective on April 23, 2010 (EPA, 2010a). This PM amendments final rule amends the conformity regulation to address the 2006 PM2.5 national ambient air quality standard (NAAQS). The final PM amendments rule also addresses hot-spot analyses in PM2.5 and PM10 and carbon monoxide nonattainment and maintenance areas.

On March 14, 2012, EPA published the *Transportation Conformity Rule Restructuring Amendments*, effective April 13, 2012 (EPA, 2012a). The amendments restructure several sections of the rule so that they apply to any new or revised NAAQS. In addition, several clarifications to improve implementation of the rule were finalized.

On March 6, 2015, EPA published *Implementation of the 2008 National Ambient Air Quality Standards for Ozone: State Implementation Plan Requirements* final rule (effective April 6, 2015), which shifted the San Joaquin Valley 2008 Ozone Standard attainment date from December 31, 2032 to July 20, 2032 (EPA, 2015). EPA's March 2015 ozone implementation rule also revoked the 1997 Ozone Standard for transportation conformity purposes. On February 16, 2018, the U.S. Court of Appeals ruled against parts of the EPA's 2015 Ozone Implementation Rule related to the revocation of the 1997 ozone standard and the relevant "anti-backsliding" requirements. However, according to *Transportation Conformity Guidance for the South Coast II Court Decision*, nonattainment areas with existing 2008 ozone conformity budgets are not required to address the 1997 ozone standards for conformity purposes.

On December 6, 2018, EPA published the *Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area State Implementation Plan Requirements* final rule, effective February 4, 2019 (EPA, 2018). The rule clarified that nonattainment areas must continue to demonstrate conformity to the 2008 ozone standards.

On August 24, 2016, EPA published its Final Rule titled *Implementing National Ambient Air Quality Standards for Fine Particles: State Implementation Plan Requirements*. According to the implementation rule, areas designated as nonattainment for the 1997 PM2.5 standards, must continue to demonstrate conformity to these standards until attainment (EPA, 2016).

MULTI-JURISDICTIONAL GUIDANCE

EPA reissued Guidance for Transportation Conformity Implementation in Multi-Jurisdictional Nonattainment and Maintenance Areas in July 2012 (EPA, 2012c). This guidance updates and supersedes the July 2004 “multi-jurisdictional” guidance (EPA, 2004a), but does not change the substance of the guidance on how nonattainment areas with multiple agencies should conduct conformity determinations. This guidance applies to the San Joaquin Valley since there are multiple MPOs within a single nonattainment area. The main principle of the guidance is that one regional emissions analysis is required for the entire nonattainment area. However, separate modeling and conformity documents may be developed by each MPO. The Transportation Conformity Guidance for 2015 Ozone NAAQS Nonattainment Areas released in June 2018 incorporates the 2012 Multi-Jurisdictional Guidance by reference.

Part 3 of the guidance applies to nonattainment areas that have adequate or approved conformity budgets addressing a particular air quality standard. This Part currently applies to the San Joaquin Valley for ozone and PM-10. The guidance allows MPOs to make independent conformity determinations for their plans and TIPs as long as all of the other subareas in the nonattainment area have conforming transportation plans and TIPs in place at the time of each MPO and the Department of Transportation (DOT) conformity determination.

With respect to PM2.5, the Transportation Conformity Rule – PM2.5 and PM10 Amendments published on March 24, 2010 effectively incorporates the “multi-jurisdictional” guidance directly into the rule. The Rule allows MPOs to make independent conformity determinations for their plans and TIPs if all of the other subareas in the nonattainment area have conforming transportation plans and TIPs in place at the time of each MPO and DOT conformity determination.

DISTRICT RULE

The San Joaquin Valley Unified Air Pollution Control District (Air District) adopted Rule 9120 Transportation Conformity on January 19, 1995 in response to requirements in Section 176(c)(4)(c) of the 1990 Clean Air Act Amendments. In May 2015, the San Joaquin Valley Unified Air Pollution Control District requested ARB to withdraw Rule 9120 from California State Implementation Plan consideration.

In July of 2015, ARB sent a letter to EPA withdrawing Rule 9120 from the California State Implementation Plan. Therefore, EPA can no longer act on the Rule. It should also be noted that EPA has changed 40 CFR 51.390 to streamline the requirements for State conformity SIPs. Since a transportation conformity SIP cannot be approved for the San Joaquin Valley, the Federal transportation conformity rule governs.

B. CONFORMITY REGULATION REQUIREMENTS

The Federal regulations identify general criteria and procedures that apply to all transportation conformity determinations, regardless of pollutant and implementation plan status. These include:

- 1) *Conformity Tests* — Sections 93.118 and 93.119 specify emissions tests (budget and interim emissions) that the TIP/RTP must satisfy in order for a determination of conformity to be found. The final transportation conformity regulation issued on July 1, 2004 requires a submitted SIP motor vehicle emissions budget to be found adequate or approved by EPA prior to use for

making conformity determinations. The budget must be used on or after the effective date of EPA's adequacy finding or approval.

2) *Methods / Modeling:*

Latest Planning Assumptions — Section 93.110 specifies that conformity determinations must be based upon the most recent planning assumptions in force at the time the conformity analysis begins. This is defined as “the point at which the MPO begins to model the impact of the proposed transportation plan or TIP on travel and/or emissions. New data that becomes available after an analysis begins is required to be used in the conformity determination only if a significant delay in the analysis has occurred, as determined through interagency consultation” (EPA, 2010b). All analyses for the Conformity Analysis were conducted using the latest planning assumptions and emissions models in force at the time the conformity analysis started in July 2021 (see Chapter 2).

Latest Emissions Models — Section 93.111 requires that the latest emission estimation models specified for use in SIPs must be used for the conformity analysis. EPA has approved EMFAC2017 for conformity use on August 15, 2019 and the final rule started the two-year grace period to transition to the new emissions model for use in conformity demonstrations. Therefore, EMFAC2014 continued to be used in this conformity analysis as documented in Chapter 3. EPA issued a federal register notice on December 14, 2015 formally approving EMFAC2014 for use in conformity determinations. On November 20, 2019, California Air Resources Board (CARB) released “EMFAC Off-Model Adjustment Factors to Account for the SAFE Vehicles Rule Part One” for use in regional conformity analyses. On March 12, 2020, EPA concurred on the use of CARB's EMFAC off-model adjustment factors in conformity demonstrations. On April 30, EPA and NHTSA published SAFE Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks (Final SAFE Rule) rolling back federal fuel economy standards. On June 26, 2020 CARB issued a public notice stating that EMFAC adjustments released in November continue to be suitable for conformity purposes. On March 14, EPA issued a final decision rescinding its 2019 waiver withdrawal, therefore EMFAC adjustments will no longer be required for regional conformity analyses. Therefore, the Conformity Analysis for the 2023 FTIP and 2022 RTP does not include SAFE Rule adjustments.

3) *Timely Implementation of TCMs* — Section 93.113 provides a detailed description of the steps necessary to demonstrate that the TIP/RTP are providing for the timely implementation of TCMs, as well as demonstrate that the plan and/or program is not interfering with this implementation. TCM documentation is included in Chapter 4 of the Conformity Analysis.

4) *Consultation* — Section 93.105 requires that the conformity determination be made in accordance with the consultation procedures outlined in the Federal regulations. These include:

- MPOs are required to provide reasonable opportunity for consultation with State air agencies, local air quality and transportation agencies, the USDOT and EPA (Section 93.105(a)(1)).
- MPOs are required to establish a proactive public involvement process, which provides opportunity for public review and comment prior to taking formal action on a conformity determination (Section 93.105(e)).

The TIP, RTP, and corresponding conformity determinations are prepared by each MPO. Copies of the draft documents are provided to member agencies and others, including FHWA, Federal Transit Administration (FTA), EPA, Caltrans, CARB, and the Air District for review. The conformity analysis is required to be publicly available and an opportunity for public review and comment is provided. MCTC's adopted consultation process and policy for conformity analysis includes a 30-day comment period (55-day for the RTP) followed by a public meeting.

C. 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.

MCTC 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. The Conformity Analysis for the 2023 FTIP and 2022 RTP includes analyses of existing and future air quality impacts for each applicable pollutant.

The San Joaquin Valley is currently designated as nonattainment for the National Ambient Air Quality Standard (NAAQS) for 8-hour ozone (revoked 1997, 2008 and 2015 standards), particulate matter under 2.5 microns in diameter (PM_{2.5}) (1997, 2006 and 2012 standards); and has a maintenance plan for particulate matter under 10 microns in diameter (PM-10). Note that the urbanized/metropolitan areas of Kern, Fresno, Stanislaus and San Joaquin Counties have attained the CO standard and maintained attainment for 20 years. In accordance with Section 93.102(b)(4), conformity requirements for the CO standard stop applying 20 years after EPA approves an attainment redesignation request or as of June 1, 2018. Therefore, future conformity analyses no longer include a CO conformity demonstration.

State Implementation Plans have been prepared to address ozone, PM-10 and PM_{2.5}:

- The 2016 Ozone Plan (2008 standard) was adopted by the Air District on June 16, 2016 and subsequently adopted by ARB on July 21, 2016. EPA found the new ozone budgets adequate on June 29, 2017 (effective July 14, 2017). In response to recent court decisions regarding the baseline RFP year, ARB adopted the revised 2008 ozone conformity budgets as part of the *2018 Updates to the California State Implementation Plan* (2018 SIP Update) on October 25, 2018. EPA approved the 2016 Ozone Plan and the budgets on March 25, 2019.
- The 2007 PM-10 Maintenance Plan (as revised in 2015) was approved by EPA on July 8, 2016 (effective September 30, 2016).

- The 2016 PM2.5 Plan and portions of the 2018 PM2.5 Plan (2012 Standard, moderate) was approved by EPA on November 26, 2021 (effective December 27, 2021).
- The 2018 PM2.5 Plan was partially approved by EPA on July 22, 2020 (effective as of publication) inclusive of the revised conformity budgets and trading mechanism for the 2006 24-hr PM2.5 standard. Then on November 26, 2021, EPA partially disapproved the original SIP submittal dealing with 1997 annual PM2.5 nonattainment. In response, CARB submitted a 2021 revision to the 2018 PM2.5 Plan demonstrating attainment by 2023. On December 29, 2021, EPA proposed approval of the SIP elements and conformity budgets that pertain to the 2012 annual PM2.5 standards serious area requirements (final action expected by end of the year). Then on January 28, 2022, EPA approved 2018 PM2.5 Plan portion dealing with the 1997 24-hour PM2.5 standard and determined that the SJV attained the standard by the December 31, 2020 deadline (effective February 28, 2022). On February 10, 2022, EPA found the 1997 annual PM2.5 budgets for attainment year 2023 adequate, effective February 25, 2022. It is expected that EPA will act on the remaining SIP elements related to annual 1997 PM2.5 nonattainment by end of the year including the trading mechanism.

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. On February 16, 2018, the U.S. Court of Appeals ruled against parts of the EPA's 2015 Ozone Implementation Rule related to the revocation of the 1997 ozone standard and the relevant "anti-backsliding" requirements. However, according to the *Transportation Conformity Guidance for the South Coast II Court Decision*, nonattainment areas with existing 2008 ozone conformity budgets are not required to address the 1997 ozone standards for conformity purposes.

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.

On June 4, 2018 EPA published final designations classifying the San Joaquin Valley as "extreme" nonattainment for 2015 ozone with an attainment deadline of 2038, effective August 3, 2018. Transportation conformity applies one year after the effective date or August 3, 2019. It is important to note that the 2015 ozone standard nonattainment area boundary for the San Joaquin Valley is exactly the same as the nonattainment area boundary for the 2008 ozone standard.

On November 13, 2009, EPA published Air Quality Designations for the 2006 24-hour PM2.5 standard, effective December 14, 2009. Nonattainment areas are required to meet the standard by 2014; transportation conformity began to apply on December 14, 2010. On January 20, 2016, EPA published *Designation of Areas for Air Quality Planning Purposes; California; San Joaquin Valley; Reclassification as Serious Nonattainment for the 2006 PM2.5 NAAQS* finalizing SJV reclassification to Serious nonattainment effective February 19, 2016. Nonattainment areas are required to meet the standard as expeditiously as practicable, but no later than December 31, 2019. It is important to note that the 2006 24-hour PM2.5 nonattainment area boundary for the San Joaquin Valley is exactly the same as the nonattainment area boundary for the 1997 annual PM2.5 standard.

EPA's nonattainment area designations for the new 2012 PM_{2.5} standards became effective on April 15, 2015. Conformity for a given pollutant and standard applies one year after the effective date (April 15, 2016). It is important to note that the 2012 PM_{2.5} standards nonattainment area boundary for the San Joaquin Valley are exactly the same as the nonattainment area boundary for the 1997 annual PM_{2.5} standard.

On July 29, 2016, EPA released its *Final Rule for Implementing National Ambient Air Quality Standards for Fine Particles*. According to the implementation rule, areas designated as nonattainment for the 1997 PM 2.5 standards, must continue to demonstrate conformity to these standards until attainment. In the San Joaquin Valley, the 1997 standards (both 24-hour and annual) continue to apply.

D. CONFORMITY TEST REQUIREMENTS

The conformity (Section 93.109(c)–(k)) rule requires that either a table or text description be provided that details, for each pollutant and precursor, whether the interim emissions tests and/or the budget test apply for conformity. In addition, documentation regarding which emissions budgets have been found adequate by EPA, and which budgets are currently applicable for what analysis years is required.

Specific conformity test requirements established for the San Joaquin Valley nonattainment areas for ozone, and particulate matter are summarized below.

Section 93.124(d) of the 1997 Final Transportation Conformity regulation allows for conformity determinations for sub-regional emission budgets by MPOs if the applicable implementation plans (or implementation plan submission) explicitly indicates an intent to create such sub-regional budgets for the purpose of conformity. In addition, Section 93.124(e) of the 1997 rules states: "...if a nonattainment area includes more than one MPO, the implementation plan may establish motor vehicle emission budgets for each MPO, or else the MPOs must collectively make a conformity determination for the entire nonattainment area." Each applicable implementation plan and estimate of baseline emissions in the San Joaquin Valley provides motor vehicle emission budgets by county, to facilitate county-level conformity findings.

OZONE (2008 AND 2015 STANDARDS)

The San Joaquin Valley currently violates both the 2008 and 2015 ozone standards; thus the conformity determination includes all corresponding analyses (see discussion under Air Quality Designations Applicable to the San Joaquin Valley above). Under the existing conformity regulations, regional emissions analyses for ozone areas must address nitrogen oxides (NO_x) and volatile organic compounds (VOC) precursors. It is important to note that in California, reactive organic gases (ROG) are considered equivalent to and are used in place of volatile organic compounds (VOC).

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. Current

federal guidance does not require 2008 ozone nonattainment areas to address the 1997 ozone standard for conformity purposes.

On March 25, 2019, EPA published a final rule approving the 2008 ozone conformity budgets and the *2018 Updates to the California State Implementation Plan*. The EPA final rule 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.

In accordance with Section 93.109(c)(2) of the conformity rule and the 2015 Ozone Transportation Conformity Guidance, if a 2015 ozone nonattainment area has adequate or approved SIP budgets that address the 2008 ozone standard, it must use the budget test until new 2015 ozone standard budgets are found adequate or approved. It is important to note that the boundaries for the 2015 ozone standard and 2008 ozone standard are identical. In addition, the 2015 Ozone Implementation Rule did not revoke 2008 standard requirements. Consequently, for this conformity analysis, the SJV MPOs will conduct demonstrations for both 2008 and 2015 ozone standards using subarea emissions budgets as established in the *2018 Updates to the California State Implementation Plan*.

The conformity budgets from Table 1 of the March 25, 2019 Federal Register are provided in Table 1-1 below. These budgets will be used to compare to emissions resulting from the 2023 FTIP and the 2022 RTP.

Table 1-1:
On-Road Motor Vehicle 2008 and 2015 Ozone Standard Emissions Budgets
 (summer tons/day)

County	2020		2023		2026		2029		2031	
	ROG	NOx	ROG	NOx	ROG	NOx	ROG	NOx	ROG	NOx
Fresno	6.7	23.9	5.5	14.1	4.9	13.2	4.5	12.4	4.2	12.1
Kern (SJV)	5.4	20.9	4.5	14.5	4.2	14.4	4.0	14.3	3.9	14.3
Kings	1.2	4.5	1.0	2.7	0.9	2.6	0.8	2.6	0.8	2.6
Madera	1.5	4.3	1.1	2.7	1.0	2.5	0.9	2.4	0.8	2.3
Merced	2.2	8.8	1.7	6.0	1.5	5.9	1.3	5.6	1.2	5.4
San Joaquin	4.7	11.2	3.9	7.4	3.5	7.0	3.1	6.6	2.8	6.3
Stanislaus	3.1	8.8	2.6	5.6	2.2	4.9	2.0	4.5	1.8	4.3
Tulare	3.0	7.6	2.4	4.6	2.1	4.0	1.8	3.7	1.7	3.5

^(a) Note that 2008 ozone budgets were established by rounding up each county's emissions totals to the nearest tenth of a ton.

PM-10

The 2007 PM-10 Maintenance Plan (as revised in 2015) was approved by EPA on July 8, 2016 (effective September 30, 2016), which contains motor vehicle emission budgets for PM-10 and NOx, as well as a trading mechanism. Motor vehicle emission budgets are established based on

average annual daily emissions. The motor vehicle emissions budget for PM-10 includes regional re-entrained dust from travel on paved roads, vehicular exhaust, travel on unpaved roads, and road construction. The conformity budgets from Table 2 of the August 12, 2016 Federal Register are provided below and will be used to compare emissions for each analysis year.

The PM-10 SIP allows trading from the motor vehicle emissions budget for the PM-10 precursor NOx to the motor vehicle emissions budget for primary PM-10 using a 1.5 to 1 ratio. The trading mechanism allows the agencies responsible for demonstrating transportation conformity in the San Joaquin Valley to supplement the 2005 budget for PM-10 with a portion of the 2005 budget for NOx, and use these adjusted motor vehicle emissions budgets for PM-10 and NOx to demonstrate transportation conformity with the PM-10 SIP for analysis years after 2005. As noted above, EPA approved the 2007 PM-10 Maintenance Plan (with minor technical corrections to the conformity budgets) on July 8, 2016, which includes continued approval of the trading mechanism.

The trading mechanism will be used only for conformity analyses for analysis years after 2005. To ensure that the trading mechanism does not impact the ability to meet the NOx budget, the NOx emission reductions available to supplement the PM-10 budget shall only be those remaining after the NOx budget has been met.

Table 1-2:
On-Road Motor Vehicle PM-10 Emissions Budgets
 (tons per average annual day)

County	2020 ^(b)	
	PM-10	NOx
Fresno	7.0	25.4
Kern ^(a)	7.4	23.3
Kings	1.8	4.8
Madera	2.5	4.7
Merced	3.8	8.9
San Joaquin	4.6	11.9
Stanislaus	3.7	9.6
Tulare	3.4	8.4

^(a)Kern County subarea includes only the portion of Kern County within the San Joaquin Valley Air Basin.
^(b)Note that EPA did not take action on the 2005 budgets of the 2007 PM10 Maintenance Plan (as revised in 2015). These budgets are not in the timeframe of this conformity analysis.

PM2.5

EPA and FHWA have indicated that areas violating both the annual and 24-hour standards for PM2.5 must address all standards in the conformity determination. The San Joaquin Valley currently violates both the 1997 annual and 24-hour and 2012 annual PM2.5 standards and the 2006

24-hour PM_{2.5} standards; thus, the conformity determination includes all corresponding analyses (see discussion under Air Quality Designations Applicable to the San Joaquin Valley above).

The 2016 PM_{2.5} Plan addressing moderate area requirements for the 2012 PM_{2.5} standard was adopted by the San Joaquin Valley Air District on September 15, 2016. The 2018 PM_{2.5} Plan addressing 1997, 2006 and 2012 PM_{2.5} standards was adopted by the San Joaquin Valley Air District on November 15, 2018 and California Air Resources Board on January 24, 2019, and subsequently submitted for EPA review together with the 2016 Moderate PM_{2.5} Plan and reclassification to serious request. On July 22, 2020, EPA published final rule approving SIP elements that pertain to 2006 24-hour PM_{2.5} standard serious area nonattainment (effective as of publication). On December 29, 2021, EPA proposed approval of the SIP elements and conformity budgets that pertain to the 2012 annual PM_{2.5} standards (final action expected by end of the year). Then on January 28, 2022, EPA approved 2018 PM_{2.5} Plan portion dealing with the 1997 24-hour PM_{2.5} standard and determined that the SJV attained the standard by the December 31, 2020 deadline (effective February 28, 2022).

While EPA partially disapproved the original SIP submittal dealing with 1997 annual PM_{2.5} nonattainment on November 26, 2021, CARB has submitted the 2021 revision to the 2018 PM_{2.5} Plan in the same month demonstrating attainment by 2023. On February 10, 2022, EPA found the 1997 annual PM_{2.5} budgets adequate, effective February 25, 2022. It is expected that EPA will act on the remaining SIP elements related to the annual 1997 PM_{2.5} standards, including the trading mechanism, by end of the year. Therefore, this analysis includes conformity tests to all new budgets contained in the 2018 PM_{2.5} Plan and its 2021 revision. Given that EPA may act on the remaining components of the 2018 PM_{2.5} Plan prior to federal approval of the 2022 RTP and 2023 FTIP conformity analysis, the new transportation conformity budgets addressing the 2012 serious PM_{2.5} standards are also included in this conformity analysis (“upcoming budget test”).

1997 (24-hour and annual) Standards

The 2018 PM_{2.5} Plan contains motor vehicle emission budgets for PM_{2.5} and NO_x established based on average annual daily emissions, as well as a trading mechanism. The motor vehicle emissions budget for PM_{2.5} includes directly emitted PM_{2.5} motor vehicle emissions from tailpipe, brake wear and tire wear. VOC, SO_x, 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. The applicable conformity budgets are provided in Table 1-3

for the 1997 annual and 24-hour PM2.5 standards and will be used to compare emissions resulting from the 2023 FTIP and the 2022 RTP.

**Table 1-3:
On-Road Motor Vehicle 1997 (24-hour and annual) PM2.5 Standard Emissions Budgets
(tons per average annual day)**

County	2020		2023	
	PM2.5	NOx	PM2.5	NOx
Fresno	0.9	25.3	0.9	15.1
Kern (SJV)	0.8	23.3	0.8	13.3
Kings	0.2	4.8	0.2	2.8
Madera	0.2	4.2	0.2	2.5
Merced	0.3	8.9	0.3	5.3
San Joaquin	0.6	11.9	0.6	7.6
Stanislaus	0.4	9.6	0.4	6.1
Tulare	0.4	8.5	0.4	5.2

The 2018 PM2.5 SIP includes 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 6.5 to 1 ratio on an annual basis and a 2 to 1 ratio on a 24-hr basis. The trading mechanism allows the agencies responsible for demonstrating transportation conformity in the San Joaquin Valley to supplement the applicable budget for PM2.5 with a portion of the applicable corresponding budget for NOx, and use these adjusted motor vehicle emissions budgets for PM2.5 and NOx to demonstrate transportation conformity with the 2018 PM2.5 SIP. 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. The trading mechanism for the 24-hour annual PM2.5 was approved by EPA on January 28, 2022. Final action on the trading mechanism for the 1997 annual PM2.5 standard is expected by end of the year.

2012 Annual PM2.5 Standard (Moderate)

On November 26, 2021, EPA published final approval of the moderate area SIP budgets for the 2012 PM2.5 standard contained in the 2016 Moderate Area PM2.5 Plan and portions of the 2018 PM2.5 plan that pertain to the moderate requirements for the 2012 PM2.5 standard. The approval also included reclassification to serious. On December 29, 2021, EPA proposed approval of the SIP elements and conformity budgets that pertain to the 2012 annual PM2.5 serious area requirements (final action expected by end of the year). Until the new 2012 serious area PM2.5 standard budgets are found adequate or approved, the SJV will conduct conformity determination for the 2012 annual PM2.5 standard using budgets established in the 2018 PM2.5 Plan for moderate nonattainment. The conformity budgets from the November 26, 2021 Federal Register are provided in Table 1-4 will be used to compare emissions resulting from 2023 FTIP and 2022 RTP.

**Table 1-4:
 On-Road Motor Vehicle 2012 (annual) PM2.5 Standard Emissions Budgets (Moderate)**
 (tons per average annual day)

County	2022	
	PM2.5	NOx
Fresno	0.9	21.2
Kern (SJV)	0.8	19.4
Kings	0.2	4.1
Madera	0.2	3.5
Merced	0.3	7.6
San Joaquin	0.6	10.0
Stanislaus	0.4	8.1
Tulare	0.4	6.9

The 2018 PM2.5 SIP includes 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 6.5 to 1 ratio on an annual basis. The trading mechanism allows the agencies responsible for demonstrating transportation conformity in the San Joaquin Valley to supplement the applicable budget for PM2.5 with a portion of the applicable corresponding budget for NOx and use these adjusted motor vehicle emissions budgets for PM2.5 and NOx to demonstrate transportation conformity with the 2018 PM2.5 SIP.

2006 24-Hour PM2.5 Standard

The 2018 PM2.5 Plan addressing 1997, 2006 and 2012 PM2.5 standards was adopted by the San Joaquin Valley Air District on November 15, 2018, and California Air Resources Board on January 24, 2019. On March 27, EPA published a proposed rule approving portions of the 2018 PM2.5 Plan, including the 2006 PM2.5 conformity budgets and trading mechanism. Final rule on sections that pertain to 2006 24-hour PM2.5 standard serious area nonattainment was published on July 22, 2020. Therefore, the conformity analysis for the 2021 FTIP and 2018 RTP incorporates new transportation conformity budgets and the new attainment year of 2024 for 2006 24-hour PM2.5 standards.

The 2018 PM2.5 Plan for the 2006 PM2.5 standard contains motor vehicle emission budgets for PM2.5 and NOx established based on average winter 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. The conformity budgets from the March 27, 2020, Federal Register, Table 14 are provided in Table 1-5 below and will be used to compare emissions resulting from the 2023 FTIP and the 2022 RTP.

Table 1-5
On-Road Motor Vehicle 2006 24-Hour PM2.5 Standard Emissions Budgets
 (tons per average winter day)

County	2020		2023		2024	
	PM2.5	NOx	PM2.5	NOx	PM2.5	NOx
Fresno	0.9	25.9	0.8	15.5	0.8	15.0
Kern (SJV)	0.8	23.8	0.7	13.6	0.7	13.4
Kings	0.2	4.9	0.2	2.9	0.2	2.8
Madera	0.2	4.4	0.2	2.6	0.2	2.5
Merced	0.3	9.1	0.3	5.5	0.3	5.3
San Joaquin	0.6	12.3	0.6	7.9	0.6	7.6
Stanislaus	0.4	9.8	0.4	6.2	0.4	6.0
Tulare	0.4	8.7	0.4	5.3	0.4	5.1

The 2018 PM2.5 SIP includes 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 PM-2.5 using a 2 to 1 ratio on a 24-hour, wintertime basis. The trading mechanism allows the agencies responsible for demonstrating transportation conformity in the San Joaquin Valley to supplement the applicable budget for PM2.5 with a portion of the applicable corresponding budget for NOx, and use these adjusted motor vehicle emissions budgets for PM2.5 and NOx to demonstrate transportation conformity with the PM2.5 SIP.

“Upcoming Budget Test” for the 2012 Annual PM2.5 Standards (Serious)

The 2018 PM2.5 Plan 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 budgets for serious 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 December 29, 2021, EPA proposed approval of the SIP elements and conformity budgets that pertain to the 2012 annual PM2.5 standards, serious area requirements (final action expected by end of the year). The 2018 PM2.5 SIP conformity budgets from December 29, 2021 Federal Register are provided in Table 1-6 below to address serious nonattainment requirements. These budgets will be used to compare emissions resulting from the 2023 FTIP and the 2022 RTP. Should EPA act on these budgets prior to federal approval of this conformity analysis, the budgets below will apply.

**Table 1-6:
On-Road Motor Vehicle 2012 (annual) PM2.5 Standard Emissions Budgets (Serious)**
(tons per average annual day)

County	2022		2025	
	PM2.5	NOx	PM2.5	NOx
Fresno	0.9	21.2	0.8	14.3
Kern (SJV)	0.8	19.4	0.8	12.8
Kings	0.2	4.1	0.2	2.7
Madera	0.2	3.5	0.2	2.3
Merced	0.3	7.6	0.3	5.0
San Joaquin	0.6	10.0	0.6	6.9
Stanislaus	0.4	8.1	0.4	5.6
Tulare	0.4	6.9	0.4	4.7

The 2018 PM2.5 SIP includes 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 6.5 to 1 ratio on an annual basis. The trading mechanism allows the agencies responsible for demonstrating transportation conformity in the San Joaquin Valley to supplement the applicable budget for PM2.5 with a portion of the applicable corresponding budget for NOx, and use these adjusted motor vehicle emissions budgets for PM2.5 and NOx to demonstrate transportation conformity with the 2018 PM2.5 SIP. 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.

E. ANALYSIS YEARS

The conformity regulation (Section 93.118[b] and [d]) requires documentation of the years for which consistency with motor vehicle emission budgets must be shown. In addition, any interpolation performed to meet tests for years in which specific analysis is not required need to be documented.

For the selection of the horizon years, the conformity regulation requires: (1) that if the attainment year is in the time span of the transportation plan, it must be modeled; (2) the last year forecast in the transportation plan must be a horizon year; and (3) horizon years may not be more than ten years apart. In addition, the conformity regulation requires that conformity must be demonstrated for each year for which the applicable implementation plan specifically establishes motor vehicle emission budgets.

Section 93.118(b)(2) clarifies that when a maintenance plan has been submitted, conformity must be demonstrated for the last year of the maintenance plan and any other years for which the maintenance plan establishes budgets in the time frame of the transportation plan. Section 93.118(d)(2) indicates that a regional emissions analysis may be performed for any years, the

attainment year, and the last year of the plan’s forecast. Other years may be determined by interpolating between the years for which the regional emissions analysis is performed.

Section 93.118(d)(2) indicates that the regional emissions analysis may be performed for any years in the time frame of the transportation plan provided they are not more than ten years apart and provided the analysis is performed for the attainment year (if it is in the time frame of the transportation plan) and the last year of the plan’s forecast period. Emissions in years for which consistency with motor vehicle emissions budgets must be demonstrated, as required in paragraph (b) of this section (i.e., each budget year), may be determined by interpolating between the years for which the regional emissions analysis is performed. Table 1-7 below provides a summary of conformity analysis years that apply to this conformity analysis.

**Table 1-7:
San Joaquin Valley Conformity Analysis Years**

Pollutant	Budget Years¹	Attainment/ Maintenance Year	Intermediate Years	RTP Horizon Year
2008 and 2015 Ozone	2011/2017/2020/2023/ 2026/2029	2031/2037 ²	NA	2046
PM-10	NA	2020	2022/2029/2037	2046
1997 24-hour PM2.5	2017/2023 ²	2020	2023/2029/2037	2046
1997 Annual PM2.5	2020/2026 ³	2023	2029/2037	2046
2012 Annual PM2.5 (moderate)	NA	2022	2025/2029/2037	2046
2006 24-hour PM2.5	2017/2020/2023/2026 ³	2024	2031/2037	2046
Upcoming 2012 Annual PM2.5 (serious)	2022	2025	2029/2037	2046

¹Budget years that are not in the time frame of the transportation plan/conformity analysis are not included as analysis years (e.g., 2011, 2014, 2017, 2020), although they may be used to demonstrate conformity.

²2031 is the attainment year for the 2008 ozone standard. 2037 is the attainment year for the 2015 ozone standard.

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. In accordance with the March 2015 *Implementation of the 2008 National Ambient Air Quality Standards for Ozone: State Implementation Plan Requirements* final rule, the attainment year of 2031 must be modeled. When using the budget test, the attainment year of the 2008 ozone standard must be analyzed (i.e. 2031).

For the 2015 ozone standard, the San Joaquin Valley has been classified as an extreme nonattainment area with an attainment date of August 3, 2038. In accordance with the December 2018 final rule, *Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area State Implementation Plan Requirements*, the attainment year of 2037 must be modeled. When using the budget test, the attainment year of the 2015 ozone standard must be analyzed (i.e. 2037).

The Clean Air Act requires all states to attain the 1997 PM_{2.5} standards as expeditiously as practicable beginning in 2010, but by no later than April 5, 2010 unless EPA approves an attainment date extension. States must identify their attainment dates based on the rate of reductions from their control strategies and the severity of the PM_{2.5} problem. The 2018 PM_{2.5} SIP addresses attainment of the 1997 24-hour PM_{2.5} standard (serious) by 2020 and was approved by EPA on January 28, 2022 (effective February 28, 2022). The attainment year is not in the timeframe of this conformity analysis. On February 10, 2022, EPA found the serious area 1997 annual PM_{2.5} budgets for attainment year 2023 adequate (effective February 25, 2022). Therefore, attainment year 2023 must be modeled.

On January 20, 2016, EPA finalized reclassification of the San Joaquin Valley to Serious nonattainment for the 2006 24-hour PM_{2.5} Standard. On August 16, 2016, the 2012 PM_{2.5} Plan was approved by EPA, effective September 30, 2016, inclusive of new conformity budgets and trading mechanism for the 2006 24-hour PM_{2.5} standard with a requirement to attain the standard as expeditiously as practicable and no later than December 31, 2019. In 2019, CARB submitted an attainment deadline extension request as part of the 2018 PM_{2.5} Plan. Final rule on 2018 PM_{2.5} SIP sections that pertain to 2006 24-hour PM_{2.5} standard serious area nonattainment was released on July 22, 2020. The attainment year of 2024 must be modeled.

On January 15, 2015, EPA classified the San Joaquin Valley as Moderate nonattainment for the 2012 PM_{2.5} Standards. On November 26, 2021, EPA issued final rule approving of the Moderate Area 2016 PM_{2.5} Plan, portions of the 2018 PM_{2.5} SIP pertaining to moderate nonattainment of the 2012 PM_{2.5} standards, and the reclassification request to serious nonattainment. The San Joaquin Valley 2018 PM_{2.5} Plan includes serious area budgets for the 2012 PM_{2.5} standards with an attainment deadline of 2025; therefore, the attainment year 2025 must be modeled.

CHAPTER 2: LATEST PLANNING ASSUMPTIONS AND TRANSPORTATION MODELING

The Clean Air Act states that “the determination of conformity shall be based on the most recent estimates of emissions, and such estimates shall be determined from the most recent population, employment, travel, and congestion estimates as determined by the MPO or other agency authorized to make such estimates.” On January 18, 2001, the USDOT issued guidance developed jointly with EPA to provide additional clarification concerning the use of latest planning assumptions in conformity determinations (USDOT, 2001).

According to the conformity regulation, 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 conformity analysis and initial emissions modeling began in July 2021.

Key elements of the latest planning assumption guidance include:

- Areas are strongly encouraged to review and strive towards regular five-year updates of planning assumptions, especially population, employment and vehicle registration assumptions.
- The latest planning assumptions must be derived from the population, employment, travel and congestion estimates that have been most recently developed by the MPO (or other agency authorized to make such estimates) and approved by the MPO.
- Conformity determinations that are based on information that is older than five years should include written justification for not using more recent information. For areas where updates are appropriate, the conformity determination should include an anticipated schedule for updating assumptions.
- The conformity determination must use the latest existing information regarding the effectiveness of the transportation control measures (TCMs) and other implementation plan measures that have already been implemented.

The MCTC uses the CUBE transportation model. The model was validated in 2020 for the 2019 base year. The latest planning assumptions used in the transportation model validation and Conformity Analysis is summarized in Table 2-1.

**Table 2-1:
 Summary of Latest Planning Assumptions for the MCTC Conformity Analysis**

Assumption	Year and Source of Data (MPO action)	Modeling	Next Scheduled Update
Population	<p>Base Year:2018</p> <p>Projections: 2022-2046</p> <p>The MCTC policy board accepted population projections published in July of 2021 by the DOF.</p>	<p>This data is disaggregated to the TAZ level for input into the CUBE for the base year validation.</p>	<p>New data from the DOF is expected to be adopted by MCTC policy board in 2026.</p>
Employment	<p>Base Year: 2018</p> <p>Projections: 2022-2046</p> <p>The MCTC does not develop or adopt employment projections. However, employment data is based on the California Department of Finance and Bureau of Labor Statistics data.</p>	<p>This data is disaggregated to the TAZ level for input into the TP+/CUBE for the base year validation.</p>	<p>New data from the California Department of Finance and Bureau of Labor Statistics is expected to be adopted by MCTC policy board in 2026.</p>
Traffic Counts	<p>Traffic data for validation representing the 2018 base validation year were obtained from the MCTC Traffic Counts Program, the cities of Madera and Chowchilla, Madera County and Caltrans.</p>	<p>CUBE was validated using these traffic counts.</p>	<p>Traffic counts are updated every year, if funds are available.</p>
Vehicle Miles of Travel	<p>The MCTC policy Board accepted the 2018 transportation model validation for the 2018 base year in September of 2020.</p>	<p>CUBE is the transportation model used to estimate VMT in Madera County.</p>	<p>VMT is an output of the transportation model. VMT is affected by the TIP/RTP project updates and is included in each new conformity analysis.</p>

Assumption	Year and Source of Data (MPO action)	Modeling	Next Scheduled Update
Speeds	<p>Transportation model 2018 base year was validated using survey data on free flow speeds and common speed flow curves.</p> <p>Speed distributions were updated in EMFAC2014 using methodology approved by ARB and with information from the transportation model.</p>	<p>The transportation model includes a feedback loop that assures congested speeds are consistent with travel speeds.</p> <p>EMFAC2014</p>	<p>A speed study will be conducted every five years, if adequate funds are available.</p>

A. SOCIOECONOMIC DATA

POPULATION, EMPLOYMENT AND LAND USE

The conformity regulation requires documentation of base case and projected population, employment, and land use used in the transportation modeling. USDOT/EPA guidance indicates that if the data is more than five years old, written justification for the use of older data must be provided. In addition, documentation is required for how land use development scenarios are consistent with future transportation system alternatives, and the reasonable distribution of employment and residences for each alternative.

Supporting Documentation:

The 2018 model base year county totals of households (HH), population (POP), and employment (EMP) were obtained using California Department of Finance and Bureau of Labor Statistics data.

The DOF Projections were used to develop the projections related to household and employment growth. The population and housing forecasts are listed in Table 2-2. The employment totals for each forecast year were estimated using the ratio of employment from the 2018 base year inventory. Land use and socioeconomic data at the zonal level are used for determining trip generation in the traffic model. Socio economic data at the Traffic Analysis Zones (TAZ) level were developed based on historic trends and planned development activity in consultation with the local agency representatives of the MCTC Technical Advisory Committee.

B. TRANSPORTATION MODELING

The San Joaquin Valley Metropolitan Planning Organizations (MPOs) utilize the CUBENAME traffic modeling software. The Valley MPO regional traffic models consist of traditional four-step traffic forecasting models. They use land use, socioeconomic, and road network data to estimate

facility-specific roadway traffic volumes. Each MPO model covers the appropriate county area, which is then divided into hundreds or thousands of individual traffic analysis zones (TAZs). In addition the model roadway networks include thousands of nodes and links. Link types include freeway, freeway ramp, other State route, expressway, arterial, collector, and local collector. Current and future-year road networks were developed considering local agency circulation elements of their general plans, traffic impact studies, capital improvement programs, and the State Transportation Improvement Program. The models use equilibrium, a capacity sensitive assignment methodology, and the data from the model for the emission estimates differentiates between peak and off-peak volumes and speeds. In addition, the model is reasonably sensitive to changes in time and other factors affecting travel choices. The results from model validation/calibration were analyzed for reasonableness and compared to historical trends.

Specific transportation modeling requirements in the conformity regulation are summarized below, followed by a description of how the MCTC transportation modeling methodology meets those requirements.

The Madera County travel model is a conventional travel demand forecasting model that is similar in structure to most other current area-wide models used for traffic forecasting. It uses land use, socioeconomic, and road network data to estimate travel patterns, roadway traffic volumes and performance measures.

The study area for the Madera County travel model covers all of Madera County. The county is divided into approximately 705 TAZs. Other travel to and from Madera County is represented by 16 gateway zones at major road crossings of the county line.

The travel demand model land use inputs (socioeconomic data) are aggregated by TAZ. Population related inputs include numbers of housing units stratified by 10 types. Employment-related inputs include employment by 21 employment categories. There are additional inputs possible for “special generators,” which would primarily be recreational users. Land uses outside of Madera County are represented by existing and projected traffic counts on the gateway roads at the county line.

TRAFFIC COUNTS

The conformity regulation requires documentation 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.).

Supporting Documentation:

The 2018 Madera County travel model was validated by comparing its estimates of year 2018 traffic volumes with approximately 85 traffic counts from years 2015 to 2018. The validation is compared to standard criteria for replicating total traffic volumes on various road types and for percent error on links.

Count sources utilized include FY 2018 Hourly Counts, Historical AADT (2004-2018) (overlapped

with FY 2018 Hourly Counts), FY 2017 AADT (HPMS), FY 2015 AADT (HPMS), 2018 AADT (PeMS), Caltrans 2017 AADT, and the Madera Traffic Monitoring Program Counts.

The modeled to observed count ratio for the 2018 base year was -3.8%, within the +/-5% threshold.

SPEEDS

The conformity regulation requires documentation of the 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. In addition, documentation of 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. Finally, 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.

Supporting Documentation:

The MCTC traffic model includes a feedback loop that uses congested travel times as an input to the trip distribution step. The feedback loop ensures that the congested travel speeds used as input to the air pollution emission models are consistent with the peak hour and off-peak travel speeds used throughout the traffic model process.

TRANSIT

The conformity regulation requires documentation of 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.

Supporting Documentation:

The current version of the Madera County model has validated transit assignment based on local transit ridership data. A new transit network consists of Madera County Connection (MCC) and Madera Area Express (MAX), and Amtrak rail service fixed routes.

Since a transit trip can be counted as more than one boarding if one or more transfers are made on the route. Total daily transit trips were estimated by dividing ridership by (1+ average number of transfers). Three different daily transit trips were estimated using different average number of transfers assumptions, as a reference.

Due to the low Amtrak ridership and the fact that most of the trips are IX/XI trips, it was determined that rail trips would be better handled using off-model processes. The transit skimming and mode choice and transit assignment models were modified to include bus mode only.

A transit assignment model was added to produce transit ridership forecasts. A reasonableness check of transit assignment results was conducted by comparing to ridership data.

Since the Amtrak daily ridership is very low and they represent only IX/XI trips, it was determined a better way of modeling Amtrak trips was via an off-model procedure similar to external and truck trip tables.

The current version of the Madera County model has estimates transit travel times based on service frequency and auto times. Bus travel coded on to the transit network.

Average wait times for bus trips are estimated as one-half of the maximum of the transit frequencies at the origin and destination of each trip. For example, if a particular trip has 70-minute service at the origin end and 35-minute service at the destination end, the average wait time will be estimated as one half of 70 minutes (the maximum of 70 and 35) or 35 minutes average wait time.

The mode choice model extends the definition of “mode” beyond the basic auto and transit options. In the Madera County model, both 2-person and 3+-person autos are predicted separately so as to retain the capability of analyzing 2-person vs. 3-person minimum carpool occupancy policies for HOV lanes. The model also predicts “walk access” to transit separately from “drive access” to better represent the tradeoffs between access modes, and to provide a clearer analysis of passenger facility usage and requirements at transit stations for walk, feeder bus, park/ride and kiss/ride transit access options. In all, the mode choice model predicts the following seven modes:

1. Drive Alone (DA)
2. 2-Person vehicle (SR2)
3. 3+-Person vehicle (SR3)
4. Walk to transit (TW)
5. Drive to transit (TD)
6. Bicycle (BK)
7. Walk (WK)

This set of alternative modes permits analysis of the trade-offs that will occur with a wide range of transportation projects or policies.

The Madera County model performs mode choice calculations separately for eight trip purposes (not including the three truck trip purposes), three household categories and two time periods:

Trip Purposes

1. Home-Work
2. Home-Shop
3. Home-K12
4. Home-College
5. Home-Other
6. Work-Other
7. Other-Other
8. Highway Commercial

Household Categories

1. Zero Auto Households

- 2. One Auto Households
- 3. Two-Plus Auto Households

Time Periods

- 1. Peak Transit Service (3-hour A.M. and 3-hour P.M. periods)
- 2. Off-Peak Transit Service (All other 18 hours)

Each of the household categories has a different likelihood of using transit and therefore model constants are estimated separately for each category.

VALIDATION/CALIBRATION

The conformity regulation requires documentation 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.). In addition, documentation of how travel models are reasonably sensitive to changes in time, cost, and other factors affecting travel choices is required. The use of HPMS, or a locally developed count-based program or procedures that have been chosen to reconcile and calibrate the network-based travel model estimates of VMT must be documented.

Supporting Documentation:

With updated input data and revised model scripts, the non-highway assignment portions of the 2018 MCTC model were re-calibrated/re-validated based on targets generated from 2010 Census and 2012 CHTS data. The tables below indicate trip generation, person trips per household, mode split by purpose, trip purpose by mode, VMT, transit, and travel time.

Trip Generation - PA Balance						
Trip Purpose	Evaluation Criterion	Productions	Attractions	P/A Ratio	Difference	Percent Difference
HBW	+/- 10%	126,756	125,028	1.01	-1,728	-1.4%
HBS	+/- 10%	76,986	79,651	0.97	2,664	3.5%
HBO	+/- 10%	252,815	237,610	1.06	-15,205	-6.0%
NHB	+/- 10%	267,711	268,012	1.00	301	0.1%

Notes: 2012 CHTS

Weekday Person Trips per Household	
CHTS	Model
9.5	11.1

Notes: 2012 CHTS

MADERA COUNTY TRANSPORTATION COMMISSION
 Conformity Analysis for the 2023 FTIP and 2022 RTP

Purpose	Total (All Modes)	Drove Alone		Shared Ride 2		Shared Ride 3+		Transit		Walk		Bike	
		CHTS	Model	CHTS	Model	CHTS	Model	CHTS	Model	CHTS	Model	CHTS	Model
HBW	100%		64.6%		6.5%		15.2%		0.0%		13.7%		0.0%
HBO	100%		33.7%		19.2%		26.0%		0.1%		18.9%		1.3%
NHB	100%		43.6%		19.3%		19.7%		1.2%		14.8%		1.5%
Total (All Purposes)	100%	40.4%	42.1%	19.1%	17.3%	22.3%	22.3%	0.0%	0.5%	16.0%	16.6%	2.1%	1.2%

Notes: 2012 CHTS

Purpose	Total (All Modes)	Drove Alone		Shared Ride 2		Shared Ride 3+		Transit		Walk		Bike	
		CHTS	Model	CHTS	Model	CHTS	Model	CHTS	Model	CHTS	Model	CHTS	Model
HBW	13.6%	23.1%	23.8%	5.2%	5.8%	9.3%	10.6%	0.0%	0.2%	21.3%	12.9%	n/a	0.0%
HBO	59.7%	49.0%	38.0%	66.2%	52.9%	68.1%	56.9%	100.0%	11.3%	58.3%	54.2%	n/a	53.9%
NHB	26.7%	27.9%	38.2%	28.6%	41.2%	22.6%	32.5%	0.0%	88.4%	20.4%	32.9%	n/a	46.1%
Total (All Purposes)	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	n/a	100.0%

Notes: 2005-2001 California Statewide Household Travel Survey. Includes only internal-to-internal, weekday pen-on-trips for all modes, weighted by weekday, trip-level weights ("WWTGT"). Drivertrips are adjusted by a factor of 1.647 to correct for underreporting. Transit includes school bus trips.

Evaluation Criterion	HPMS	Model	% Deviation
+/- 5%	4,749,280	4,819,333	1.5%

Notes: Daily Vehicle Miles Traveled. Highway Performance Management System – 2018 Data, Table 6.

Trip Purpose						
HBW		HBO		NHB		
CHTS	Model	CHTS	Model	CHTS	Model	
11.3	15.6	14.8	15.4	10.3	10.1	

Notes: 2012 CHTS

Validation Statistic	Evaluation Criterion	Observed Ridership	Model Bus Transit Trips	Percentage
Difference between actual ridership to model results for entire system	+/- 20%	2,927	2,832	-3%

Notes: 2016/2017 MCC, MAX ridership adjusted by average 0.8 transfers.

Trip Type	Trip Purpose					
	HBW		HBO		NHB	
	CHTS	Model	CHTS	Model	CHTS	Model
II	66.0%	68.6%	82.0%	80.1%	75.0%	77.5%
IX	25.0%	24.7%	12.0%	11.8%	15.0%	11.3%
XI	9.0%	6.6%	7.0%	8.1%	10.0%	11.3%

Notes: 2012 California Statewide Household Travel Survey.

The updated 2018 model performs very well in highway ADT assignment. It passes all but one test. The Model/Count Ratio is within +/-5%, the RMSE is less than 30% and the correlation coefficient

is 0.98, which is much better than the 0.88 target. The only criterion it does not meet is the Percent of links Within Caltrans Maximum Deviation. The model results in 66 percent of links, with counts, meeting the Caltrans criteria for daily traffic volumes. It is slightly lower than the > 75% target. But it is acceptable considering we used a small sample size of 85 count locations, and it passes the other three criteria easily. The table below shows Highway ADT Validation.

Table 15: Highway ADT Validation

Daily Assignment	Value	Criterion
Model/Count Ratio =	-3.8%	< +/- 5%
Percent Root Mean Square Error =	17.5%	< 30%
Correlation Coefficient =	0.98	> 0.88
Percent Within Caltrans Maximum Deviation =	69%	> 75%

The models were validated by comparing its estimates of base year traffic conditions with base year traffic counts. The base year validations meet standard criteria for replicating total traffic volumes on various road types and for percent error on links. The base year validation also meets standard criteria for percent error relative to traffic counts on groups of roads (screen-lines) throughout each county.

For Serious and above nonattainment areas, transportation conformity guidance, Section 93.122(b)(3) of the conformity regulation states:

Highway Performance Monitoring System (HPMS) estimates of vehicle miles traveled (VMT) shall be considered the primary measure of VMT within the portion of the nonattainment or maintenance area and for the functional classes of roadways included in HPMS, for urban areas which are sampled on a separate urban area basis. For areas with network-based travel models, a factor (or factors) may be developed to reconcile and calibrate the network-based travel model estimates of VMT in the base year of its validation to the HPMS estimates for the same period. These factors may then be applied to model estimates of future VMT. In this factoring process, consideration will be given to differences between HPMS and network-based travel models, such as differences in the facility coverage of the HPMS and the modeling network description. Locally developed count-based programs and other departures from these procedures are permitted subject to the interagency consultation procedures.

In addition to the static tests noted above, dynamic tests to evaluate the model response to change were performed. The model performed as expected for all dynamic tests. Example dynamic validation includes testing the changes in the following:

- Add and remove households in a residential TAZ
- Add and remove jobs in a commercialized TAZ
- Add and remove a roadway link in the network
- Add and remove travel lanes in the network
- Change link speeds or capacities

FUTURE NETWORKS

The conformity regulation requires that a listing of regionally significant projects and federally-funded non-regionally significant projects assumed in the regional emissions analysis be provided in the conformity documentation. In addition, all projects that are exempt must also be documented.

§93.106(a)(2)ii and §93.122(a)(1) requires that regionally significant additions or modifications to the existing transportation network that are expected to be open to traffic in each analysis year be documented for both Federally funded and non-federally funded projects (see Appendix B).

§93.122(a)(1) requires that VMT for non-regionally significant Federal projects is accounted for in the regional emissions analysis. It is assumed that all SJV MPOs include these projects in the transportation network (see Appendix B).

§93.126, §93.127, §93.128 require that all projects in the TIP/RTP that are exempt from conformity requirements or exempt from the regional emissions analysis be documented. In addition, the reason for the exemption (Table 2, Table 3, traffic signal synchronization) must also be documented (see Appendix B). It is important to note that the CTIPs exemption code is provided in response to FHWA direction.

Supporting Documentation: [Review the following and update for your specific modeling procedures as necessary]

The build highway networks include qualifying projects based on the 2022 RTP and 2023 FTIP. Not all of the street and freeway projects included in the TIP/RTP qualify for inclusion in the highway network. Projects that call for study, design, or non-capacity improvements are not included in the networks. When these projects result in actual facility construction projects, the associated capacity changes are coded into the network as appropriate. Since the networks define capacity in terms of number of through traffic lanes, only construction projects that increase the lane-miles of through traffic are included.

Generally, Valley MPO highway networks include all roadways included in the county or cities classified system. These links typically include all freeways plus expressways, arterials, collectors and local collectors. Highway networks also include regionally significant planned local improvements from Transportation Impact Fee Programs and developer funded improvements required to mitigate the impact of a new development.

Small-scale local street improvements contained in the TIP/RTP are not coded on the highway network. Although not explicitly coded, traffic on collector and local streets is simulated in the models by use of abstract links called “centroid connectors”. These represent local streets and driveways which connect a neighborhood to a regionally-significant roadway. Model estimates of centroid connector travel are reconciled against HPMS estimates of collector and local street travel.

C. TRAFFIC ESTIMATES

A summary of the population, employment, and travel characteristics for the MCTC transportation modeling area for each scenario in the Conformity Analysis is presented in Table 2-2.

**Table 2-2:
 Traffic Network Comparison for Horizon Years Evaluated in Conformity Analysis**

Horizon Year	Total Population	Employment	Average Weekday VMT (millions)	Total Lane Miles
2022	162,722	51,491	4.31	1,632
2023	164,472	52,098	4.33	N/A
2024	166,348	52,706	4.25	N/A
2025	168,293	53,313	4.26	N/A
2026	170,225	53,920	4.26	N/A
2029	176,067	55,742	4.28	1,721
2031	180,087	56,956	4.32	N/A
2037	191,533	60,190	4.55	1,918
2046	207,038	65,421	4.71	1,935

D. VEHICLE REGISTRATIONS

MCTC does not estimate vehicle registrations, age distributions or fleet mix. Rather, current forecasted estimates for these data are developed by CARB and included in the EMFAC2014 model (http://www.arb.ca.gov/msei/onroad/latest_version.htm). Vehicle registrations, age distribution and fleet mix are developed and included in the model by CARB and cannot be updated by the user. While EPA issued final approval for EMFAC2017 use in conformity demonstrations on August 15, 2019, the Conformity Analysis for the 2023 FTIP and the 2022 RTP relies on EMFAC2014 since the analysis began in July 2021, in line with the grace period established in the Final Rule. EPA issued a federal register notice on December 14, 2015 formally approving EMFAC2014 for conformity.

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 applicable air quality plans. The emission reductions assumed for these committed measures reflect the latest implementation status of these measures. Committed control measures in the applicable air quality plans that reduce mobile source emissions and are used in conformity, are summarized below.

OZONE

No committed control measures are included in the 2016 Ozone Plan.

PM-10

Committed control measures in the EPA approved 2007 PM-10 Maintenance Plan that reduce mobile source emissions are shown in Table 2-3. However, reductions from these control measures were not applied to this conformity analysis because they were not needed to demonstrate conformity.

**Table 2-3:
 2007 PM-10 Maintenance Plan Measures Assumed in the Conformity Analysis**

Measure Description	Pollutants
ARB existing Reflash, Idling, and Moyer	PM-10 annual exhaust NOx annual exhaust
District Rule 8061: Paved and Unpaved Roads	PM-10 paved road dust PM-10 unpaved road dust
District Rule 8021 Controls: Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities	PM-10 road construction dust

NOTE: State reductions from the Carl Moyer, Reflash and Idling have been included in EMFAC2014.

PM2.5

No committed control measures are included in the 2016 PM2.5 Plan and the 2018 PM2.5 Plan.

CHAPTER 3: AIR QUALITY MODELING

The model used to estimate vehicle exhaust emissions for ozone precursors and particulate matter is EMFAC2014. CARB emission factors for PM10 have been used to calculate re-entrained paved and unpaved road dust, and fugitive dust associated with road construction. For this conformity analysis, model inputs not dependent on the TIP or RTP are consistent with the applicable SIPs, which include:

- The 2016 Ozone Plan (2008 standard) was adopted by the Air District on June 16, 2016 and subsequently adopted by the ARB on July 21, 2016. EPA found the new ozone budgets adequate on June 29, 2017 (effective July 14, 2017). In response to recent court decisions regarding the baseline RFP year, ARB adopted the revised 2008 ozone conformity budgets as part of the 2018 Updates to the California State Implementation Plan Update on October 25, 2018. EPA approved the budgets and the plan on March 25, 2019.
- The 2007 PM-10 Maintenance Plan (as revised in 2015) was approved by EPA on July 8, 2016 (effective September 30, 2016).
- The 2016 PM2.5 Plan and portions of the 2018 PM2.5 Plan (2012 Standard, moderate) was approved by EPA on November 26, 2021 (effective December 27, 2021).
- The 2018 PM2.5 Plan was partially approved by EPA on July 22, 2020 (effective as of publication) inclusive of the revised conformity budgets and trading mechanism for the 2006 24-hr PM2.5 standard. On December 29, 2021, EPA proposed approval of the SIP elements and conformity budgets that pertain to the 2012 annual PM2.5 serious area requirements (final action expected by end of the year). Then on January 28, 2022, EPA approved 2018 PM2.5 Plan portion dealing with the 1997 24-hour PM2.5 standard and determined that the SJV attained the standard by the December 31, 2020 deadline (effective February 28, 2022). On February 10, 2022, EPA found the 1997 annual PM2.5 budgets for attainment year 2023 adequate, effective February 25, 2022. It is expected that EPA will act on the remaining SIP elements related to annual 1997 PM2.5 nonattainment by end of the year, including the trading mechanism.

The conformity regulation requirements for the selection of the horizon years are summarized in Chapter 1; regional emissions have been estimated for the horizon years summarized in Table 1-6.

A. EMFAC2014

The EMFAC model (short for EMISSION FACTOR) is a computer emissions modeling software that estimates emission rates for motor vehicles for calendar years from 2000 to 2050 operating in California. Pollutant emissions for hydrocarbons, carbon monoxide, nitrogen oxides, particulate matter, lead, sulfur oxides, and carbon dioxide are output from the model. Emissions are calculated for passenger cars, light, heavy, and medium-duty trucks, motorcycles, buses and motor homes.

EMFAC is used to calculate current and future inventories of motor vehicle emissions at the state, county, air district, air basin, or MPO level. EMFAC contains default vehicle activity data that can be used to estimate a motor vehicle emissions inventory in tons/day for a specific year and season, and as a function of ambient temperature, relative humidity, vehicle population, mileage accrual, miles of travel, and vehicle speeds.

Section 93.111 of the conformity regulation requires the use of the latest emission estimation model in the development of conformity determinations. On December 30, 2014, ARB released EMFAC2014, which is the latest update to the EMFAC model for use by California State and local governments to meet Clean Air Act (CAA, 1990) requirements. Nearly a year later, on December 14, 2015, EPA announced the availability of this latest version of the California EMFAC model for use in SIP development in California. EMFAC2014 was required for conformity analysis on or after December 14, 2017.

On March 1, 2018 ARB released an update to the EMFAC model – EMFAC2017v1.0.2. The model was submitted for EPA review in the fall of 2018 and EPA published final approval of EMFAC for conformity use on August 15, 2019. The announcement set a grace period of 2 years before EMFAC2017 is required for use in new regional emissions analyses. The conformity analysis for the 2023 FTIP and the 2022 RTP began in July 2021, before the EMFAC2017 grace period expired; therefore, this analysis relies on EMFAC2014 for all conformity tests.

On January 15, 2021, ARB released the latest update to the EMFAC model – EMFAC2021v1.0.0. EPA has not yet approved EMFAC2021 for regional conformity use.

On September 27, 2019, the United States Environmental Protection Agency (EPA) and the National Highway Traffic Safety Administration (NHTSA) published the “Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program” (effective November 26, 2019). The Part One Rule revoked California’s authority to set its own greenhouse gas emissions standards, which were incorporated in EMFAC2014 emissions model. On November 20, 2019, California Air Resources Board (CARB) released “EMFAC Off-Model Adjustment Factors to Account for the SAFE Vehicles Rule Part One” for use in regional conformity analyses. On March 12, 2020, EPA concurred on the use of CARB’s EMFAC off-model adjustment factors in conformity demonstrations. On April 30, EPA and NHTSA published SAFE Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks (Final SAFE Rule) rolling back federal fuel economy standards. On June 26, 2020, CARB issued a public notice stating that EMFAC adjustments released in November continue to be suitable for conformity purposes. On March 14, 2021, EPA issued a final decision rescinding its 2019 waiver withdrawal, therefore EMFAC adjustments are no longer required for regional conformity analyses. Therefore, the conformity analysis for the 2023 FTIP and the 2022 RTP does not include SAFE Rule adjustments.

A transportation data template has been prepared to summarize the transportation model output for use in EMFAC 2014. The template includes allocating VMT by speed bin by hour of the day. EMFAC2014 was used to estimate exhaust emissions for ozone, PM-10, and PM2.5 conformity demonstrations consistent with the applicable air quality plan. Note that the statewide SIP measures documented in Chapter 2 are already incorporated in the EMFAC2014 model as appropriate.

B. ADDITIONAL PM-10 ESTIMATES

PM-10 emissions for re-entrained dust from travel on paved and unpaved roads will be calculated separately from roadway construction emissions. It is important to note that with the final approval of the 2007 PM-10 Maintenance Plan, EPA approved a methodology to calculate PM-10 emissions from paved and unpaved roads in future San Joaquin Valley conformity determinations. The Conformity Analysis uses these methodologies and estimates construction-related PM-10 emissions consistent with the 2007 PM-10 Maintenance Plan. The National Ambient Air Quality Standards for PM-10 consists of a 24-hour standard, which is represented by the motor vehicle emissions budgets established in the 2007 PM-10 Maintenance Plan. It is important to note that EPA revoked the annual PM-10 Standard on October 17, 2006. The PM-10 emissions calculated for the conformity analysis represent emissions on an annual average day and are used to satisfy the budget test.

CALCULATION OF REENTRAINED DUST FROM PAVED ROAD TRAVEL

On January 13, 2011 EPA released a new method for estimating re-entrained road dust emissions from cars, trucks, buses, and motorcycles on paved roads. On February 4, 2011, EPA published the *Official Release of the January 2011 AP-42 Method for Estimating Re-Entrained Road Dust from Paved Roads* approving the January 2011 method for use in regional emissions analysis and beginning a two year conformity grace period, after which use of the January 2011 AP-42 method is required (e.g. February 4, 2013) in regional conformity analyses.

The road dust calculations have been updated to reflect this new methodology. More specifically, the emission factor equation and k value (particle size multiplier) have been updated accordingly. CARB default assumptions for roadway silt loading by roadway class, average vehicle weight, and rainfall correction factor remain unchanged. Emissions are estimated for five roadway classes including freeways, arterials, collectors, local roads, and rural roads. Countywide VMT information is used for each road class to prepare the emission estimates.

CALCULATION OF REENTRAINED DUST FROM UNPAVED ROAD TRAVEL

The base methodology for estimating unpaved road dust emissions is based on a CARB methodology in which the miles of unpaved road are multiplied by the assumed VMT and an emission factor. In the 2007 PM-10 Maintenance Plan, it is assumed that all non-agricultural unpaved roads within the San Joaquin Valley receive 10 vehicle passes per day. An emission factor

of 2.0 lbs PM-10/VMT is used for the unpaved road dust emission estimates. Emissions are estimated for city/county maintained roads.

CALCULATION OF PM-10 FROM ROADWAY CONSTRUCTION

Section 93.122(e) of the Transportation Conformity regulation requires that PM-10 from construction-related fugitive dust be included in the regional PM-10 emissions analysis, if it is identified as a contributor to the nonattainment problem in the PM-10 implementation plan. The emission estimates are based on a CARB methodology in which the miles of new road built are converted to acres disturbed, which is then multiplied by a generic project duration (i.e., 18 months) and an emission rate. Emission factors are unchanged from the previous estimates at 0.11 tons PM-10/acre-month of activity. The emission factor includes the effects of typical control measures, such as watering, which is assumed to reduce emissions by about 50%. Updated activity data (i.e., new lane miles of roadway built) is estimated based on the highway and transit construction projects in the TIP/RTP.

PM-10 TRADING MECHANISM

The PM-10 SIP allows trading from the motor vehicle emissions budget for the PM-10 precursor NO_x to the motor vehicle emissions budget for primary PM-10 using a 1.5 to 1 ratio. The trading mechanism will be used only for conformity analyses for analysis years after 2005.

C. PM2.5 APPROACH

EPA and FHWA have indicated that areas violating both the annual and 24-hour standards for PM_{2.5} must address all standards in the conformity determination. The San Joaquin Valley currently violates both the 1997 and 2012 annual PM_{2.5} standards, and the 1997 and 2006 24-hour PM_{2.5} standards; thus the conformity determination includes analyses to all PM_{2.5} standards.

The following PM_{2.5} approach addresses the 1997 (annual and 24-hour), the 2012 (annual), and the 2006 (24-hour) standards:

EMFAC2014 incorporates data for temperature and relative humidity that vary by geographic area, calendar year and season. The annual average represents an average of all the monthly inventories. A winter average represents an average of the California winter season (October through February). EMFAC will be run to estimate direct PM_{2.5} and NO_x emissions from motor vehicles for an annual or winter average day as described below.

EPA guidance indicates that State and local agencies need to consider whether VMT varies during the year enough to affect PM_{2.5} annual emission estimates. The availability of seasonal or monthly VMT data and the corresponding variability of that data need to be evaluated.

PM_{2.5} areas that are currently using network-based travel models must continue to use them when calculating annual emission inventories. The guidance indicates that the interagency consultation process should be used to determine the appropriate approach to produce accurate annual inventories for a given nonattainment area. Whichever approach is chosen, that approach should

be used consistently throughout the analysis for a given pollutant or precursor. The interagency consultation process should also be used to determine whether significant seasonal variations in the output of network-based travel models are expected and whether these variations would have a significant impact on PM_{2.5} emission estimates.

The SJV MPOs all use network-based travel models. However, the models only estimate average weekday VMT. The SJV MPOs do not have the data or ability to estimate seasonal variation at this time. Data collection and analysis for some studies are in the preliminary phases and cannot be relied upon for other analyses. Some statewide data for the seasonal variation of VMT on freeways does exist. However, traffic patterns on freeways do not necessarily represent the typical traffic pattern for local streets and arterials.

In many cases, traffic counts are sponsored by the MPOs and conducted by local jurisdictions. While some local jurisdictions may collect weekend or seasonal data, typical urban traffic counts occur on weekdays (Tuesday through Thursday). Data collection must be more consistent in order to begin estimation of daily or seasonal variation.

The SJV MPOs believe that the average annual day calculated from the current traffic models and EMFAC2014 represent the most accurate VMT data available. The MPOs will continue to discuss and research options that look at how VMT varies by month and season according to the local traffic models.

It is important to note that the guidance indicates that EPA expects the most thorough analysis for developing annual inventories will occur during the development of the SIP, taking into account the needs and capabilities of air quality modeling tools and the limitations of available data. Prior to the development of the SIP, State and local air quality and transportation agencies may decide to use simplified methods for regional conformity analyses.

The regional emissions analyses in PM_{2.5} nonattainment areas must consider directly emitted PM_{2.5} motor vehicle emissions from tailpipe, brake wear, and tire wear. In California, areas will use EMFAC2014. As indicated under the Conformity Test Requirements, re-entrained road dust and construction-related fugitive dust from highway or transit projects is not included at this time. In addition, NO_x emissions are included; however, VOC, SO_x, and ammonia emissions are not.

1997 24-Hour and Annual Standards –The portions of the 2018 PM_{2.5} Plan dealing with the 1997 24-hour standard was approved by EPA on January 28, 2022 (effective February 28, 2022) and contain motor vehicle emission budgets for PM_{2.5} and NO_x established based on average annual daily emissions. The 1997 annual PM_{2.5} transportation conformity budgets for annual average PM_{2.5} and NO_x emissions were found adequate by EPA on February 19, 2022 (effective February 25, 2022). The annual inventory methodology contained in the 2018 PM_{2.5} Plan was used to establish emissions budgets is consistent with the methodology used herein. The motor vehicle emissions budget for PM_{2.5} includes directly emitted PM_{2.5} motor vehicle emissions from tailpipe, brake wear and tire wear. VOC, SO_x, 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.

2006 24-Hour Standard – On March 27, 2020, EPA proposed approval of portions of the 2018 PM_{2.5} Plan that pertain to the 2006 24-hour PM_{2.5} standard, including granting attainment

deadline extension to 2024. This portion of the 2018 PM_{2.5} Plan was finalized on July 22, 2020, effective as of publication. The 2018 PM_{2.5} Plan contains motor vehicle emission budgets for PM_{2.5} and NO_x established based on average winter daily emissions. The winter inventory methodology contained in the 2018 PM_{2.5} Plan and used to establish emissions budgets is consistent with the methodology used herein. The motor vehicle emissions budget for PM_{2.5} include directly emitted PM_{2.5} motor vehicle emissions from tailpipe, brake wear and tire wear. VOC, SO_x, 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.

2012 Annual Standard – On November 26, 2021, EPA issued final approval of the 2016 Moderate Area PM_{2.5} Plan and the portions of the 2018 PM_{2.5} plan that pertain to the moderate requirements for the 2012 PM_{2.5} standard. The approval also included reclassification to serious. On December 29, 2021, EPA proposed approval of the SIP elements and conformity budgets that pertain to the 2012 annual PM_{2.5} serious area requirements (final action expected by end of the year). Until the new 2012 serious area PM_{2.5} standard budgets are found adequate or approved, the SJV will conduct conformity determination for the 2012 annual PM_{2.5} standard using budgets established in the 2018 PM_{2.5} and 2018 PM_{2.5} Plan for moderate nonattainment. The 2018 PM_{2.5} Plan contains motor vehicle emission budgets for PM_{2.5} and NO_x established based on average annual daily emissions. The annual inventory methodology contained in the 2018 PM_{2.5} Plan and used to establish emissions budgets is consistent with the methodology used herein. The motor vehicle emissions budget for PM_{2.5} include directly emitted PM_{2.5} motor vehicle emissions from tailpipe, brake wear and tire wear. VOC, SO_x, 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.

If EPA does not act on the serious area 2012 PM_{2.5} budgets, the moderate area annual PM_{2.5} budgets will continue to be used in this conformity analysis. However, if the new conformity budgets are approved or found adequate, the “upcoming budget test” addresses conformity to new conformity budgets.

1997 AND 2012 ANNUAL PM_{2.5} TRADING MECHANISM

The 2018 PM_{2.5} Plan budgets and trading mechanism will also be used in this conformity analysis for moderate and serious 2012 PM_{2.5} and serious 1997 PM_{2.5} standards, as needed. The 2016 PM_{2.5} Plan and 2018 PM_{2.5} Plan allows trading for 2012 PM_{2.5} from the motor vehicle emissions budget for the PM_{2.5} precursor NO_x to the motor vehicle emissions budget for primary annual PM_{2.5} using a 6.5 to 1 ratio. No trading mechanism for 1997 annual PM_{2.5} is currently available, but final EPA action is expected by end of the year.

2006 and 1997 24-Hour PM_{2.5} TRADING MECHANISM

On July 22, 2020, EPA partially approved the 2018 PM_{2.5} SIP including the 2006 PM_{2.5} standard trading mechanism that allows trading from the motor vehicle emissions budget for the PM_{2.5} precursor NO_x to the motor vehicle emissions budget for primary PM-2.5 using a 2 to 1 ratio. Then

on January 28, 2022, EPA approved 1997 24-hour PM_{2.5} SIP elements contained in the 2018 PM_{2.5} Plan, inclusive of the inter-pollutant trading mechanism with the same 2 to 1 ratio. This trading mechanism will be used for the 2006 and 1997 24-hour PM_{2.5} standard conformity analysis, as needed.

D. SUMMARY OF PROCEDURES FOR REGIONAL EMISSIONS ESTIMATES

New step-by-step air quality modeling instructions were developed for SJV MPO use with EMFAC2014. These instructions were originally provided for interagency consultation in May 2016 and were last updated in September 2020. EPA, FHWA, and ARB concurred.

Documentation of the Conformity Analysis for the 2023 FTIP and 2022 RTP is provided in Appendix C, including:

- 2022 RTP Conformity EMFAC Spreadsheet
- 2022 RTP Conformity Paved Road Spreadsheet
- 2022 RTP Conformity Unpaved Road Dust Spreadsheet
- 2022 RTP Conformity Construction Spreadsheet
- 2022 RTP Conformity Totals Spreadsheet

CHAPTER 4: TRANSPORTATION CONTROL MEASURES

This chapter provides an update of the current status of transportation control measures identified in applicable implementation plans. Requirements of the Transportation Conformity regulation relating to transportation control measures (TCMs) are presented first, followed by a review of the applicable air quality implementation plans and TCM findings for the TIP/RTP.

A. TRANSPORTATION CONFORMITY REGULATION REQUIREMENTS FOR TCMS

The Transportation Conformity regulation requires that the TIP/RTP “must provide for the timely implementation of TCMs in the applicable implementation plan.” The Federal definition for the term “transportation control measure” is provided in 40 CFR 93.101:

“any measure that is specifically identified and committed to in the applicable implementation plan that is either one of the types listed in Section 108 of the CAA [Clean Air Act], or any other measure for the purpose of reducing emissions or concentrations of air pollutants from transportation sources by reducing vehicle use or changing traffic flow or congestion conditions. Notwithstanding the first sentence of this definition, vehicle technology based, fuel-based, and maintenance-based measures which control the emissions from vehicles under fixed traffic conditions are not TCMs for the purposes of this subpart.”

In the Transportation Conformity regulation, the definition provided for the term “applicable implementation plan” is:

“Applicable implementation plan is defined in section 302(q) of the CAA and means the portion (or portions) of the implementation plan, or most recent revision thereof, which has been approved under section 110, or promulgated under section 110(c), or promulgated or approved pursuant to regulations promulgated under section 301(d) and which implements the relevant requirements of the CAA.”

Section 108(f)(1) of the Clean Air Act as amended in 1990 lists the following transportation control measures and technology-based measures:

- (i) programs for improved public transit;
- (ii) restriction of certain roads or lanes to, or construction of such roads or lanes for use by, passenger buses or high occupancy vehicles;
- (iii) employer-based transportation management plans, including incentives;
- (iv) trip-reduction ordinances;
- (v) traffic flow improvement programs that achieve emission reductions;

- (vi) fringe and transportation corridor parking facilities serving multiple occupancy vehicle programs or transit service;
- (vii) programs to limit or restrict vehicle use in downtown areas or other areas of emission concentration particularly during periods of peak use;
- (viii) programs for the provision of all forms of high-occupancy, shared-ride services;
- (ix) programs to limit portions of road surfaces or certain sections of the metropolitan area to the use of non-motorized vehicles or pedestrian use, both as to time and place;
- (x) programs for secure bicycle storage facilities and other facilities, including bicycle lanes, for the convenience and protection of bicyclists, in both public and private areas;
- (xi) programs to control extended idling of vehicles;
- (xii) programs to reduce motor vehicle emissions, consistent with title II, which are caused by extreme cold start conditions;
- (xiii) employer-sponsored programs to permit flexible work schedules;
- (xiv) programs and ordinances to facilitate non-automobile travel, provision and utilization of mass transit, and to generally reduce the need for single occupant vehicle travel, as part of transportation planning and development efforts of a locality, including programs and ordinances applicable to new shopping centers, special events, and other centers of vehicle activity;
- (xv) programs for new construction and major reconstructions of paths, tracks or areas solely for the use by pedestrian or other non-motorized means of transportation when economically feasible and in the public interest. For purposes of this clause, the Administrator shall also consult with the Secretary of the Interior; and
- (xvi) program to encourage the voluntary removal from use and the marketplace of pre-1980 model year light duty vehicles and pre-1980 model light duty trucks.

TCM REQUIREMENTS FOR A TRANSPORTATION PLAN

The EPA regulations in 40 CFR 93.113(b) indicate that transportation control measure requirements for transportation plans are satisfied if two criteria are met:

“(1) The transportation plan, in describing the envisioned future transportation system, provides for the timely completion or implementation of all TCMs in the applicable implementation plan which are eligible for funding under Title 23 U.S.C. or the Federal Transit Laws, consistent with schedules included in the applicable implementation plan.

(2) Nothing in the transportation plan interferes with the implementation of any TCM in the applicable implementation plan.”

TCM REQUIREMENTS FOR A TRANSPORTATION IMPROVEMENT PROGRAM

Similarly, in 40 CFR Section 93.113(c), EPA specifies three TCM criteria applicable to a transportation improvement program:

“(1) An examination of the specific steps and funding source(s) needed to fully implement each TCM indicates that TCMs which are eligible for funding under title 23 U.S.C. or the Federal Transit Laws are on or ahead of the schedule established in the applicable implementation plan, or, if such TCMs are behind the schedule established in the applicable implementation plan, the MPO and DOT have determined that past obstacles to implementation of the TCMs have been identified and have been or are being overcome, and that all State and local agencies with influence over approvals or funding for TCMs are giving maximum priority to approval or funding of TCMs over other projects within their control, including projects in locations outside the nonattainment or maintenance area;

(2) If TCMs in the applicable implementation plan have previously been programmed for Federal funding but the funds have not been obligated and the TCMs are behind the schedule in the implementation plan, then the TIP cannot be found to conform:

- if the funds intended for those TCMs are reallocated to projects in the TIP other than TCMs, or
- if there are no other TCMs in the TIP, if the funds are reallocated to projects in the TIP other than projects which are eligible for Federal funding intended for air quality improvement projects, e.g., the Congestion Mitigation and Air Quality Improvement Program;

(3) Nothing in the TIP may interfere with the implementation of any TCM in the applicable implementation plan.”

B. APPLICABLE AIR QUALITY IMPLEMENTATION PLANS

Only transportation control measures from applicable implementation plans for the San Joaquin Valley region are required to be updated for this analysis. For this conformity analysis, the applicable implementation plans, according to the definition provided at the start of this chapter, are summarized below.

APPLICABLE IMPLEMENTATION PLAN FOR OZONE

The 2016 Ozone Plan does not include new TCMs for the San Joaquin Valley.

APPLICABLE IMPLEMENTATION PLAN FOR PM-10

The 2007 PM-10 Maintenance Plan (as revised in 2015) was approved by EPA on July 8, 2016 (effective September 30, 2016). No new local agency control measures were included in the Plan.

The Amended 2003 PM-10 Plan was approved by EPA on May 26, 2004 (effective June 25, 2004). A local government control measure assessment was completed for this plan. The analysis focused on transportation-related fugitive dust emissions, which are not TCMs by definition. The local government commitments are included in the *Regional Transportation Planning Agency Commitments for Implementation Document, April 2003*.

However, the *Amended 2002 and 2005 Ozone Rate of Progress Plan* contains commitments that reduce ozone related emissions; these measures are documented in the *Regional Transportation Planning Agency Commitments for Implementation Document, April 2002*. These commitments are included by reference in the Amended 2003 PM-10 Plan to provide emission reductions for precursor gases and help to address the secondary particulate problem. Since these commitments are included in the Plan by reference, the commitments were approved by EPA as TCMs.

APPLICABLE IMPLEMENTATION PLAN FOR PM2.5

The 2018 PM2.5 Plan does not include any additional TCMs for the San Joaquin Valley.

C. IDENTIFICATION OF 2002 RACM THAT REQUIRE TIMELY IMPLEMENTATION DOCUMENTATION

As part of the 2004 Conformity Determination, FHWA requested that each SIP (Reasonably Available Control Measure - RACM) commitment containing federal transportation funding and a transportation project and schedule be addressed more specifically. FHWA verbally requested documentation that the funds were obligated and the project was implemented as committed to in the SIP.

The RTPA Commitment Documents, Volumes One and Two, dated April 2002 (Ozone RACM) were reviewed, using a “Summary of Commitments” table. Commitments that contain specific Federal funding/transportation projects/schedules were identified for further documentation. In some cases, local jurisdictions used the same Federal funding/transportation projects/schedules for various measures; these were identified as combined with (“comb w/”) reference as appropriate. A not applicable (“NA”) was noted where federally-funded project is vehicle technology based, fuel based, and maintenance based measures (e.g., LEV program, retrofit programs, clean fuels - CNG buses, etc.).

In addition, the RTPA Commitment Document, Volume Three, dated April 2003 (PM-10 BACM) was reviewed, using the Summary of Commitments table. Commitments that contain specific Congestion Mitigation and Air Quality (CMAQ) funding for the purchase and/or operation of street sweeping equipment have been identified. Only one commitment (Fresno - City of Reedley) was identified.

The Project TID Table was developed to provide implementation documentation necessary for the measures identified. Detailed information is summarized in the first five columns, including the commitment number, agency, description, funding and schedule (if applicable).

For each project listed, the TIP in which the project was programmed, as well as the project ID and description have been provided. In addition, the current implementation status of the project has been included (e.g., complete, under construction, etc). MPO staff determined this information in consultation with the appropriate local jurisdiction. Any projects not implemented according to schedule or project changes are explained in the project status column. These explanations are consistent with the guidance and regulations provided in the Transportation Conformity regulation.

Supplemental documentation was provided to FHWA in August and September 2004 in response to requests for information on timely implementation of TCMs in the San Joaquin Valley. The supplemental documentation included the approach, summary of interagency consultation correspondence, and three tables completed by each of the eight MPOs. The Supplemental Documentation was subsequently approved by FHWA as part of the 2004 Conformity Determination.

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. This documentation has been updated as part of this Conformity Analysis. A summary of this information is provided in Appendix D.

In March 2005, the SJV MPOs began interagency consultation with FHWA and EPA to address outstanding RACM/TCM issues. In general, criteria were developed to identify commitments that require timely implementation documentation. The criteria were applied to the 2002 RACM Commitments approved by reference as part of the Amended 2003 PM-10 Plan. In April 2006, EPA transmitted final tables that identified the approved RACM commitments that require timely implementation documentation for the Conformity Analysis. Subsequently, an approach to provide timely implementation documentation was developed in consultation with FHWA.

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. A brief summary of the commitment, including finite end dates if applicable, is included for each measure. The MPOs provided a status update regarding implementation in consultation with their member jurisdictions. If a specific project has been implemented, it is included in the Project TID Table under "Additional Projects Identified". This documentation was included in the Conformity Analysis for the 2007 TIP and 2004 RTP (as amended) that was approved by FHWA in October 2006. The 2002 RACM TID Table has been updated as part of this Conformity Analysis. A summary of this information is provided in Appendix D.

D. TCM FINDINGS FOR THE TIP AND REGIONAL TRANSPORTATION PLAN

Based on a review of the transportation control measures contained in the applicable air quality plans, as documented in the two tables contained in Appendix D, the required TCM conformity findings are made below:

The TIP/RTP provide for the timely completion or implementation of the TCMs in the applicable air quality plans. In addition, nothing in the TIP or RTP interferes with the implementation of any TCM in the applicable implementation plan, and priority is given to TCMs.

E. RTP CONTROL MEASURE ANALYSIS IN SUPPORT OF 2003 PM-10 PLAN

In May 2003, the San Joaquin Valley MPO Executive Directors committed to conduct feasibility analyses as part of each new RTP in support of the 2003 PM-10 Plan. This commitment was retained in the 2007 PM-10 Maintenance Plan. In accordance with this commitment, MCTC undertook a process to identify and evaluate potential control measures that could be included in the 2022 RTP. The analysis of additional measures included verification of the feasibility of the measures in the PM-10 Plan BACM analysis, as well as an analysis of new PM-10 commitments from other PM-10 nonattainment areas.

A summary of the process to identify potential long-range control measures analysis and results to be evaluated as part of the RTP development was transmitted to the Interagency Consultation (IAC) partners for review. FHWA and EPA concurred with the summary of the long-range control measure approach in September 2009.

The Local Government Control Measures considered in the PM-10 Plan BACM analysis that were considered for inclusion in the 2022 RTP included:

- Paving or Stabilizing Unpaved Roads and Alleys
- Curbing, Paving, or Stabilizing Shoulders on Paved Roads
- Frequent Routine Sweeping or Cleaning of Paved Roads (i.e., funding allocation for the purchase of PM-10 efficient street sweepers for member jurisdictions)
- Repave or Overlay Paved Roads with Rubberized Asphalt

It is important to note that the first three measures considered in the PM-10 Plan BACM analysis (i.e., access points, street cleaning requirements, and erosion clean up) are not applicable for inclusion in the RTP.

With the adoption of each new RTP, the MPOs will consider the feasibility of these measures, as well as identify any other new PM-10 measures that would be relevant to the San Joaquin Valley. MCTC also considered PM-10 commitments from other PM-10 nonattainment areas that had been developed since the previous RTP was approved. Federal websites were reviewed for any PM-10 plans that have been approved since 2012. New PM-10 plans that have been reviewed include:

- A. Owens Valley, CA Serious PM-10 Nonattainment Area SIP, submitted June 9, 2016 (EPA approval effective April 12, 2017). Road dust was determined to be below de minimis thresholds and no mobile source control measures were adopted.

- B. Juneau’s Mendenhall Valley, AK PM-10 Limited Maintenance Plan submitted February 20, 2009 (EPA approval effective July 8, 2013). The attainment plan control measures included optimizing sanding and de-icing materials to minimize entrainment, spring street sweeping, and paving of dirt roads. No additional measures were identified for the LMP to continue attainment of the NAAQS. Contingency measures include paving of dirt roads and stabilization of unpaved shoulders.
- C. Wallula, WA Second PM-10 Maintenance Plan submitted November 22, 2019 (EPA approval effective June 1, 2020). The plan relies on fugitive dust controls from livestock operations.
- D. Eagle River, AK PM-10 Nonattainment Plan submitted on November 10, 2020 (EPA approval effective December 9, 2021) The plan control measures include paving gravel roads with recycle asphalt product.
- E. Pinehurst, ID PM-10 Limited Maintenance Plan submitted September 29, 2017 (EPA approval effective October 11, 2018). The plan primarily relies on control strategies for residential wood smoke. No additional PM-10 dust measures are included.

Based on review of commitments from other PM-10 nonattainment areas that have been developed since the previous RTP, no additional on-road fugitive dust controls measures are available for consideration.

Based on consultation with CARB and the Air District, MCTC considered priority funding allocations in the 2022 RTP for PM-10 and NOx emission reduction projects in the post-attainment year timeframe that go beyond the emission reduction commitments made for the attainment year 2010 for the following four measures:

- (1) Paving or Stabilizing Unpaved Roads and Alleys
- (2) Curbing, Paving, or Stabilizing Shoulders on Paved Roads
- (3) Frequent Routine Sweeping or Cleaning of Paved Roads (i.e., funding allocation for the purchase of PM-10 efficient street sweepers for member jurisdictions); and
- (4) Repave or Overlay Paved Roads with Rubberized Asphalt

MCTC and its member agencies consider both short and long-term PM10 and PM 2.5 emission reductions to be a priority. Congestion Mitigation and Air Quality (CMAQ) funding has been continuously utilized by MCTC to fund projects for implementation of measures 1, 2 and 3 above and is planned for future implementation as well, so long as the funding is available. MCTC will consider member agency project proposals for use of rubberized asphalt in accordance with adopted program policies, including cost-effectiveness policies. MCTC will continue to work with member jurisdictions and evaluate the ability to proceed with PM-10 projects as part of the FTIP and RTP.

TCM projects completed since the 2021 FTIP adoption are detailed in Appendix B.

CHAPTER 5: INTERAGENCY CONSULTATION

The requirements for consultation procedures are listed in the Transportation Conformity Regulations under section 93.105. 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. Section 93.105 of the conformity regulation notes that there is a requirement to develop a conformity SIP that includes procedures for interagency consultation, resolution of conflicts, and public consultation as described in paragraphs (a) through (e). Section 93.105(a)(2) states that prior to EPA approval of the conformity SIP, “MPOs and State departments of transportation must provide reasonable opportunity for consultation with State air agencies, local air quality and transportation agencies, DOT and EPA, including consultation on the issues described in paragraph (c)(1) of this section, before making conformity determinations.” The Air District adopted Rule 9120 Transportation Conformity on January 19, 1995 in response to requirements in Section 176(c)(4)(c) of the Clean Air Act as amended in 1990. Since EPA has not approved Rule 9120 (the conformity SIP), the conformity regulation requires compliance with 40 CFR 93.105 (a)(2) and (e) and 23 CFR 450.

Section 93.112 of the conformity regulation requires documentation of the interagency and public consultation requirements according to Section 93.105. A summary of the interagency consultation and public consultation conducted to comply with these requirements is provided below. Appendix E includes the public meeting process documentation. The responses to comments received as part of the public comment process are included in Appendix F.

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.

The draft boilerplate conformity document was distributed for interagency consultation on February 29, 2022. Comments received have been addressed and incorporated into this version of the analysis.

In addition, the CMAQ Policy Threshold Evaluation was transmitted for interagency consultation in May 2021. No changes to the CMAQ Policy were recommended. The San Joaquin Valley MPO CMAQ policy contains language that says the cost-effectiveness threshold will be evaluated with every FTIP, whereas, the policy itself is to be reviewed with every RTP. As part of the 2023 FTIP development, the threshold was reviewed. The review indicated that a threshold should be increased to \$63/lb. No adverse comments were received

The Conformity Analysis for the 2023 FTIP and 2022 RTP was developed in consultation with Madera County Transportation Commission local partner agencies, including member jurisdictions, Caltrans, and local transit agencies.

The 2023 FTIP, 2022 RTP, and corresponding conformity analysis and environmental document were released on June 29, 2022, for a 55-day public comment period, followed by adoption on August 31, 2022. Federal approval is anticipated on or before December 31, 2022.

Transportation planning is a collaborative process and includes visioning, forecasting population/employment, projecting future land use in conjunction with local jurisdictions, assessing needs, developing capital and operating strategies to move people and goods, and developing a financial plan. Consistent with SB 375 and Title 23 CFR Part 450.316, MCTC planning processes are designed to foster involvement by all interested parties, such as walking and bicycling representatives, transportation providers, appropriate federal, state, and local agencies, public health departments and advocates, housing advocates, community groups, environmental advocates, building industry representatives, broad-based business organizations, landowners, the Native American community, neighboring MPOs, and the general public through a proactive public participation process.

The 2017 Regional Transportation Plan Guidelines for MPOs states that “coordination is the cooperative development of plans, programs and schedules among agencies and entities with legal standing to achieve general consistency. Consultation means that one or more parties confer with other identified parties in accordance with the established process and, prior to taking action(s), considers the views of the other parties and periodically informs them about action(s) taken. It is very important for the development of the RTP to be conducted both in coordination and consultation with interested parties.”

B. PUBLIC CONSULTATION

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

All MPOs in the San Joaquin Valley have standard public involvement procedures. MCTC has an adopted consultation process and policy for conformity analysis which includes a 30-day public notice and comment period followed by a public hearing. 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 6: TIP AND RTP CONFORMITY

The principal requirements of the transportation conformity regulation for TIP/RTP assessments are: (1) the TIP and RTP must pass an emissions budget test with a budget that has been found to be adequate by EPA for transportation conformity purposes, or an interim emission test; (2) the latest planning assumptions and emission models must be employed; (3) the TIP and RTP must provide for the timely implementation of transportation control measures (TCMs) specified in the applicable air quality implementation plans; and (4) consultation. The final determination of conformity for the TIP/RTP is the responsibility of the Federal Highway Administration and the Federal Transit Administration.

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 transportation conformity regulation 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 conformity tests, satisfying the remaining requirement of the transportation conformity regulation. Separate tests were conducted for ozone, PM-10 and PM2.5 (1997 and 2012 PM2.5 standards, and 2006 24-hour PM2.5 standards). 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 transportation conformity regulation and summarized in Chapters 2 and 3. The results are summarized below, followed by a more detailed discussion of the findings for each pollutant. Table 6-1 presents results for ozone (ROG/NO_x), PM-10 (PM-10/NO_x), and PM2.5 (PM2.5/NO_x) respectively, in tons per day for each of the horizon years tested.

Ozone:

For 2008 and 2015 8-hour ozone, the applicable conformity test is the emissions budget test, using the *2018 Updates to the California State Implementation Plan* budgets for the San Joaquin Valley established for ROG and NO_x for an average summer (ozone) season day. EPA approved the plan and the budgets on March 25, 2019. The modeling results for all analysis years indicate that the on-road vehicle ROG and NO_x emissions predicted for each of the “Build” scenarios are less than the emissions budgets. The TIP/RTP therefore satisfy the conformity emissions test for volatile organic compounds and nitrogen oxides.

PM-10:

For PM-10, the applicable conformity test is the emissions budget test, using the 2007 PM-10 Maintenance Plan budgets for PM-10 and NO_x. This Plan revisions including conformity budgets was approved by EPA on July 8, 2016 (effective September 30, 2016). The modeling results for

all analysis years indicate that the PM-10 emissions predicted for the “Build” scenarios are less than the emissions budget for 2020. The TIP/RTP therefore satisfy the conformity emissions tests for PM-10.

1997 24-Hour PM2.5 Standards:

For 1997 24-Hour PM2.5 Standards, the applicable conformity test is the emission budget test, using budgets established in the 2018 PM2.5 Plan. EPA approved 2018 PM2.5 Plan elements pertaining to the 1997 24-hour on January 28, 2022 inclusive of a trading mechanism. 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 PM2.5 and nitrogen oxides.

1997 Annual PM2.5 Standards:

For 1997 annual PM2.5 Standards, the applicable conformity test is the emission budget test, using budgets established in the 2016 PM2.5 Plan and the 2021 SIP revision to the 2018 PM2.5 Plan. EPA found the 1997 annual PM2.5 budgets adequate on February 10, 2022 (effective February 25, 2022). Final action on the trading mechanism is still pending at this time. 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 PM2.5 and nitrogen oxides.

2006 PM2.5 Standard:

On July 22, 2020, EPA approved portions of the 2018 PM2.5 Plan that pertain to the 2006 24-hour PM2.5 standard, including new transportation conformity budgets and trading mechanism. For the 2006 PM2.5 standard, the applicable conformity test is the emission budget test, using approved budgets established in the 2018 PM2.5 Plan. 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 PM2.5 and nitrogen oxides.

2012 PM2.5 Standard:

On November 26, 2021, EPA issued final approval of the 2016 Moderate Area PM2.5 Plan and portions of the 2018 PM2.5 plan that pertain to the moderate requirements for the 2012 PM2.5 standard. The approval also included reclassification to serious. On December 29, 2021, EPA proposed approval of the SIP elements and conformity budgets that pertain to the 2012 annual PM2.5 serious area requirements (final action expected by end of the year). Until the new 2012 serious area PM2.5 standard budgets are found adequate or approved, the SJV will conduct conformity determination for the 2012 annual PM2.5 standard using budgets established in the 2018 PM2.5 and 2018 PM2.5 Plan for moderate nonattainment.

For the 2012 PM2.5 standards, the applicable conformity test is the emissions budget test, using moderate area budgets. 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. However, if the serious 2018 PM2.5 Plan conformity budgets are approved or found adequate, the “upcoming budget test” also demonstrates conformity to the new 2012 PM2.5 budgets. The TIP/RTP therefore satisfy the conformity emissions test for PM2.5 and nitrogen oxides.

As all requirements of the Transportation Conformity Regulation have been satisfied, a finding of conformity for the 2023 FTIP and the 2022 RTP is supported.

**Table 6-1:
 Conformity Results Summary**

2022 RTP Conformity Analysis Results Summary – Madera

PM-10	Total On-Road Exhaust		Paved Road Dust		Unpaved Road Dust		Road Construction Dust		Total	
	PM-10	Nox	PM-10	Nox	PM-10	Nox	PM-10	Nox	PM-10	Nox
2022	0.281	2.859	0.803		0.511		0.029		1.6	2.9
2029	0.266	1.494	0.789		0.511		0.191		1.8	1.5
2037	0.275	1.249	0.781		0.511		0.367		1.9	1.2
2046	0.281	1.162	0.817		0.511		0.029		1.6	1.2

Standard	Analysis Year	Emissions Total		DID YOU PASS?	
		ROG (tons/day)	NOx (tons/day)	ROG	NOx
2008 and 2015 Ozone	2023 Budget	1.1	2.7		
	2023	1.0	2.0	YES	YES
	2026 Budget	1.0	2.5		
	2026	0.8	1.7	YES	YES
	2029 Budget	0.9	2.4		
	2029	0.7	1.5	YES	YES
	2031 Budget	0.8	2.3		
	2031	0.7	1.4	YES	YES
	2037	0.5	1.3	YES	YES
	2046	0.5	1.2	YES	YES

Standard	Analysis Year	Emissions Total		DID YOU PASS?	
		PM-10 (tons/day)	NOx (tons/day)	PM-10	NOx
PM-10	2020 Budget	2.5	4.7		
	2022	1.6	2.9	YES	YES

MADERA COUNTY TRANSPORTATION COMMISSION
 Conformity Analysis for the 2023 FTIP and 2022 RTP

	2020 Budget	2.5	4.7		
	2029	1.8	1.5	YES	YES
	2020 Budget	2.5	4.7		
	2037	1.9	1.2	YES	YES
	2020 Budget	2.5	4.7		
	2046	1.6	1.2	YES	YES

Standard	Analysis Year	Emissions Total		DID YOU PASS?	
		PM2.5 (tons/day)	NOx (tons/day)	PM2.5	NOx
1997 24-Hour PM2.5 Standard	2020 Budget	0.2	4.2		
	2021	0.2	2.1	YES	YES
	2020 Budget	0.2	4.2		
	2029	0.2	1.5	YES	YES
	2020 Budget	0.2	4.2		
	2037	0.2	1.3	YES	YES
	2020 Budget	0.2	4.2		
2046	0.2	1.2	YES	YES	

	Analysis Year	Emissions Total		DID YOU PASS?	
		PM2.5 (tons/day)	NOx (tons/day)	PM2.5	NOx
1997 Annual PM2.5 Standard	2023 Budget	0.2	2.5		
	2021	0.2	2.1	YES	YES
	2023 Budget	0.2	2.5		
	2029	0.2	1.5	YES	YES
	2023 Budget	0.2	2.5		
	2037	0.2	1.3	YES	YES

MADERA COUNTY TRANSPORTATION COMMISSION
 Conformity Analysis for the 2023 FTIP and 2022 RTP

	2023 Budget	0.2	2.5		
	2046	0.2	1.2	YES	YES

Standard	Analysis Year	Emissions Total		DID YOU PASS?	
		PM2.5 (tons/day)	NOx (tons/day)	PM2.5	NOx
2006 PM2.5 Winter 24-Hour Standard	2023 Budget	0.2	2.6		
	2023	0.2	2.2	YES	YES
	2024 Budget	0.2	2.5		
	2024	0.2	2.0	YES	YES
	2024 Budget	0.2	2.5		
	2031	0.2	1.5	YES	YES
	2024 Budget	0.2	2.5		
	2037	0.2	1.3	YES	YES
	2024 Budget	0.2	2.5		
	2046	0.2	1.2	YES	YES

Standard	Analysis Year	Emissions Total		DID YOU PASS?	
		PM2.5 (tons/day)	NOx (tons/day)	PM2.5	NOx
2012 Annual PM2.5 Standard (Moderate)	2022 Budget	0.2	3.5		
	2022	0.2	2.9	YES	YES
	2022 Budget	0.2	3.5		
	2025	0.2	1.8	YES	YES
	2022 Budget	0.2	3.5		
	2029	0.2	1.5	YES	YES
	2022 Budget	0.2	3.5		
	2037	0.2	1.3	YES	YES

MADERA COUNTY TRANSPORTATION COMMISSION
 Conformity Analysis for the 2023 FTIP and 2022 RTP

	2022 Budget	0.2	3.5		
	2046	0.2	1.2	YES	YES

UPCOMING BUDGET TEST

(Note: EPA Action is Pending as of This Analysis; The 2012 PM2.5 Moderate Budget Test Above Will be Used if EPA Doesn't Determine Adequacy or Approval of the New Serious Area Budgets before Federal Approval of the 2022 RTP Conformity Analysis)

Standard	Analysis Year	Emissions Total		DID YOU PASS?	
		PM2.5 (tons/day)	NOx (tons/day)	PM2.5	NOx
2012 Annual PM2.5 Standard (Serious)	2022 Budget	0.2	3.5		
	2022	0.2	2.9	YES	YES
	2025 Budget	0.2	2.3		
	2025	0.2	1.8	YES	YES
	2025 Budget	0.2	2.3		
	2029	0.2	1.5	YES	YES
	2025 Budget	0.2	2.3		
	2037	0.2	1.3	YES	YES
	2025 Budget	0.2	2.3		
	2046	0.2	1.2	YES	YES

REFERENCES

CAA, 1990. *Clean Air Act*, as amended November 15, 1990. (42 U. S. C. Section 7401et seq.) November 15, 1990.

EPA, 1993. 40 CFR Parts 51 and 93. *Criteria and Procedures for Determining Conformity to State or Federal Implementation Plans of Transportation Plans, Programs and Projects Funded or Approved Under Title 23 U.S.C. or the Federal Transit Act*. U.S. Environmental Protection Agency. Federal Register, November 24, 1993, Vol. 58, No. 225, p. 62188.

EPA, 2004a. *Companion Guidance for the July 1, 2004, Final Transportation Conformity Rule: Conformity Implementation in Multi-jurisdictional Nonattainment and Maintenance Areas for Existing and New Air Quality Standards*. U.S. Environmental Protection Agency. July 21, 2004.

EPA, 2010a. 40 CFR Part 93. *Transportation Conformity Rule PM2.5 and PM10 Amendments; Final Rule*. Federal Register, March 24, 2010, Vol. 75, No. 56, p. 14260.

EPA, 2010b. *Transportation Conformity Regulations EPA-420-B-10-006*. March.

EPA, 2012a. 40 CFR Part 93. *Transportation Conformity Rule Restructuring Amendments; Final Rule*. Federal Register, March 14, 2012, Vol. 77, No. 50, p. 14979.

EPA, 2012b. *Transportation Conformity Guidance for 2008 Ozone Nonattainment Areas*. U.S. Environmental Protection Agency. EPA-420-B-12-045. July 2012.

EPA, 2012c. *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 2009 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, 2016. *Fine Particulate Matter National Ambient Air Quality Standards: State Implementation Plan Requirements*. Final Rule. U.S. Environmental Protection Agency. PA-HQ- OAR-2013-0691. July 29, 2016.

EPA, 2018(a). *Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area State Implementation Plan Requirements*. Final Rule. U.S. Environmental Protection Agency. Vol. 83, No. 234, December 6, 2018.

EPA, 2018(b). *Transportation Conformity Guidance for the South Coast II Court Decision*. EPA-420-B-12-050. November 2018.

MADERA COUNTY TRANSPORTATION COMMISSION

Conformity Analysis for the 2023 FTIP and 2022 RTP

EPA, 2018(c). *Transportation Conformity Guidance for 2015 Ozone NAAQS Nonattainment Areas*. EPA-420-B-18-023. June 2018.

USDOT. 2001. *Use of Latest Planning Assumptions in Conformity Determinations*. Memorandum from U.S. Department of Transportation. January 18, 2001.

USDOT. 2001. Federal Highway Administration. Planning Assistance and Standards. 23 CFR 450. October 16.

APPENDIX A
CONFORMITY CHECKLIST

CONFORMITY ANALYSIS DOCUMENTATION

Checklist for MPO TIPs/RTPs 2022

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, p.10-12	
§93.102 (b)(2)(iii)	PM10 areas: document whether EPA or state has found VOC and/or NOx to be a significant contributor or if the SIP establishes a budget	Ch. 1, p.13-14	
§93.102 (b)(2)(iv)	PM2.5 areas: document if both EPA and the state have found that NOx is not a significant contributor or that the SIP does not establish a budget (otherwise, conformity applies for NOx)	N/A	NOx is a significant contributor.
§93.102 (b)(2)(v)	PM2.5 areas: document whether EPA or state has found VOC, SO2, and/or NH3 to be a significant contributor or if the SIP establishes a budget	Ch. 1, p.14-19; Ch. 3, p. 37-40	
§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 made by DOT.	ES, p.1; Ch. 5, p. 49; Appendix E	
§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	Document that horizon years are no more than 10 years apart ((a)(1)(i)). Document that the first horizon year is no more than 10 years from the based year used to validate the transportation demand planning model ((a)(1)(ii)). Document that the attainment year is a horizon year, if in the timeframe of the plan ((a)(1)(iii)). Describe the regionally significant additions or modifications to the existing transportation network that are expected to be open to traffic in each analysis year ((a)(2)(ii)). Document that the design concept and scope of projects allows adequate model representation to determine intersections with regionally significant	Ch. 1, p.19-21, Table 1-7	

MADERA COUNTY TRANSPORTATION COMMISSION

Conformity Analysis for the 2023 FTIP and 2022 RTP

40 CFR	Criteria	Page	Comments
	facilities, route options, travel times, transit ridership and land use.		
§93.108	Document that the TIP/RTP is fiscally constrained (23 CFR 450).	ES, p.2, Appendix B	
§93.109 (a, b)	Document that the TIP/RTP complies with any applicable conformity requirements of air quality implementation plans (SIPs) and court orders.	ES, p.2-3	
§93.109 (c,)	Provide either a table or text description that details, for each pollutant, precursor and applicable standard, whether the interim emissions test(s) 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.	ES, p. 3-4; Ch.1, p.12-19; Ch.6 p.51-53	
§93.109(e)	CO or PM10: Document if the area has a limited maintenance plan and from where that information comes	Ch.1 p.13-14	
§93.109(f)	Document if motor vehicle emissions are an insignificant contributor and in what SIP that determination is found	N/A	
§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, p.22-32	
EPA-DOT guidance	Document the use of planning assumptions less than five years old. If unable, include written justification for the use of older data. (December 2008 guidance,)	Ch.2, p.22-32	
§93.110 (c,d,e,f)	Document any changes in transit operating policies and assumed ridership levels since the previous conformity determination (c). Document the assumptions about transit service, use of the latest transit fares, and road and bridge tolls (d). Document the use of the latest information on the effectiveness of TCMs and other SIP measures that have been implemented (e). Document the key assumptions and show that they were agreed to through Interagency and public consultation (f).	Ch.2, p.26-27; Ch.5 p.48-50	
§93.111	Document the use of the latest emissions model approved by EPA. If the previous model was used and the grace period has ended, document that the analysis began before the end of the grace period.	Ch.3, p.35-36	

*MADERA COUNTY TRANSPORTATION COMMISSION
Conformity Analysis for the 2023 FTIP and 2022 RTP*

40 CFR	Criteria	Page	Comments
§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.5, p.48-50	
§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. 4, p.41-47; Appendix D	
§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).	ES, p.1	Analysis addresses both documents
For Areas with SIP Budgets:			
§93.118, §93.124	Document what the applicable budgets are, and for what years. Document if there are subarea budgets established, and for which areas (93.124(c)). Document if there is a safety margin established, and what are the budgets with the safety margin included. (93.124(a)). Document if there has been any trading among budgets, and if so, which SIP establishes the trading mechanism, and how it is used in the conformity analysis (93.124(b)). If there is more than one MPO in the area, document whether separate budgets are established for each MPO (93.124(d)).	Ch.1, 12-19	
§93.118 (a, c, e)	Document that emissions from the transportation network for each applicable pollutant and precursor, including projects in any associated donut area that are in the 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. 6, p.51-53, Table 6-1	
§93.118 (b)	Document for which years consistency with motor vehicle emissions budgets must be shown.	Ch.1, p.19-21	
§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.1, Table 1-7 and Ch.6 Table 6-1	
For Areas without Applicable SIP Budgets:			

*MADERA COUNTY TRANSPORTATION COMMISSION
Conformity Analysis for the 2023 FTIP and 2022 RTP*

40 CFR	Criteria	Page	Comments
§93.119	Document whether the area must meet just one or both interim emissions tests. If both, document that it is the “less than” form of these tests (i.e., §93.119(b)(1) and (c)(1) vs. (b)(2), (c)(2), and (d)).	N/A	
§93.119 ^a (a, b, c, d)	Document that emissions from the transportation network for each applicable pollutant and precursor, including projects in any associated donut area that are in the TIP and regionally significant non-Federal projects, are consistent with the requirements of the “Action/Baseline” or “Action/Baseline Year” emissions tests as applicable.	N/A	
§93.119 (e)	Document the appropriate baseline year.	N/A	
§93.119 (f)	Document the use of appropriate pollutants and if EPA or the state has made a finding that a particular precursor or component of PM10 is significant or insignificant.	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	
§93.119 (h, i)	Document how the baseline and action scenarios are defined for each analysis year.	N/A	
For All Areas Where a Regional Emissions Analysis Is Needed			
§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 year 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, p.31; Appendix B	
§93.122 (a)(2, 3)	Document that only emission reduction credits from TCMs on schedule have been included, or that partial credit has been taken for partially implemented TCMs (a)(2). 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 (a)(3).	Ch.4, p.41-47	

MADERA COUNTY TRANSPORTATION COMMISSION

Conformity Analysis for the 2023 FTIP and 2022 RTP

40 CFR	Criteria	Page	Comments
§93.122 (a)(4,5,6,7)	For nonregulatory measures that are not included in the transportation plan and TIP, include written commitments from appropriate agencies (a)(4). Document that assumptions for measures outside the transportation system (e.g. fuels measures) are the same for baseline and action scenarios (a)(5). Document that factors such as ambient temperature are consistent with those used in the SIP unless modified through interagency consultation (a)(6). Document the method(s) used to estimate VMT on off-network roadways in the analysis (a)(7).	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, p.28-30	
§93.122 (b)(1)(ii) ⁱ	Document the land use, population, employment, and other network-based travel model assumptions.	Ch. 2, p. 22-24, Table 2-1	
§93.122 (b)(1)(iii) ⁱ	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, p. 24-25	
§93.122 (b)(1)(iv) ⁱ	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, p. 25-26	
§93.122 (b)(1)(v) ⁱⁱ	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, p. 26-30	
§93.122 (b)(1)(vi) ⁱ	Document how travel models are reasonably sensitive to changes in time, cost, and other factors affecting travel choices.	Ch. 2, p. 26-30	
§93.122 (b)(2) ⁱⁱ	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, p. 25-26	
§93.122 (b)(3) ⁱⁱ	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, p. 25-26, 29-30	

*MADERA COUNTY TRANSPORTATION COMMISSION
Conformity Analysis for the 2023 FTIP and 2022 RTP*

40 CFR	Criteria	Page	Comments
§93.122 (d)	In areas not subject to §93.122(b), document the continued use of modeling techniques or the use of appropriate alternative techniques to estimate vehicle miles traveled	N/A	
§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.	Ch. 3, p.36-37	
§93.122 (g)	If appropriate, document that the conformity determination relies on a previous regional emissions analysis and is consistent with that analysis, i.e. that:	N/A	
	(g)(1)(i): the new plan and TIP contain all the projects that must be started to achieve the highway and transit system envisioned by the plan	N/A	
	(g)(1)(ii): all plan and TIP projects are included in the transportation plan with design concept and scope adequate to determine their contribution to emissions in the previous determination;	N/A	
	(g)(1)(iii): the design concept and scope of each regionally significant project in the new plan/TIP are not significantly different from that described in the previous;	N/A	
	(g)(1)(iv): the previous regional emissions analysis meets 93.118 or 93.119 as applicable	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.	Appendix B; Ch. 5 48-50	

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. Also note these procedures apply in any areas where the use of these procedures has been the previous practice of the MPO (40 CFR 93.122(d)).

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.

Madera County Transportation Commission Federally Funded Projects that Implement Approved TCMs

Jurisdiction/Agency	TIP/RTP Project ID	CTIPs Project ID	Description		Estimated Cost	Exemption Code (per CTIPs - next sheet)
TCM1 - Traffic Flow Improvements						
MADCO	MAD102060	22100000286	Road 23	Ave 8 1/2 to Ave 9 1/2	Shoulder Paving	\$187,000 1.04
MADCO	MAD102061	22100000288	Ave 9	Road 23 to Road 23 1/2	Shoulder Paving	\$99,000 1.04
MADCO	MAD102073	22100000370	Road 36	Avenue 9 to Avenue 12	Shoulder Paving	\$563,000 1.04
MADCO	MAD102074	22100000371	Road 36	Avenue 12 1/2 to Avenue 15	Shoulder Paving	\$469,000 1.04
MADCO	MAD102075	22100000372	Road 36	Avenue 15 to Highway 145	Shoulder Paving	\$563,000 1.04
MADCO	MAD102076	22100000373	Road 209	SR 41 to 4.6 miles North	Shoulder Paving	\$863,000 1.04
MADCO	MAD102077	22100000374	Road 23	Avenue 14 to Avenue 15 1/2, 18 1/2 South 2,000 linear feet	Shoulder Paving	\$357,000 1.04
MADCO	MAD102079	22100000376	Road 12	Avenue 25 to City Limits (1 mile)	Shoulder Paving	\$188,000 1.04
MADCITY	MAD202072	22100000284	Raymond Road	Raymond Road	Shoulder Paving, Curb and Gutter	\$314,000 1.04
MADCITY	MAD202079	22100000333	Madera	Sports Complex	Shoulder Paving, Curb, Gutter	\$306,000 1.04
MADCITY	MAD202080	22100000334	Madera	Various Locations	Alley Paving	\$185,000 1.10
MADCITY	MAD202081	22100000335	Madera	Intersections of 4th Street, Lake Street, and Central Avenue	Intersection Improvements	\$566,000 1.07
MADCITY	MAD202091	22100000381	Pecan Avenue	Pine to Golden State Boulevard	Shoulder Paving	\$665,000 1.04
MADCITY	MAD202095	22100000385	Madera	Purchase and Install Adaptive Signal Control Technology	Traffic Signal Upgrades	\$135,000 5.07
MADCO	MAD102081	22100000410	Shoulder Paving Road 16	Shoulder paving of 4 feet on each side of the roadway on Road 16 from SR 152 to Avenue 24 for a distance of .95 miles	Shoulder Paving	\$197,000 1.04
MADCO	MAD102082	22100000413	Shoulder Paving Avenue 9	Shoulder paving of 4 feet on each side of the roadway on Avenue 9 from Road 38 to Childrens Boulevard SR 145 for a distance of 2.84 miles	Shoulder Paving	\$567,000 1.04
MADCO	MAD102083	22100000414	Shoulder Paving Avenue 7	Shoulder paving of 4 feet on each side of the roadway on Avenue 7 from Road 30 1/2 to SR 145 for a distance of 3.5 miles	Shoulder Paving	\$724,000 1.04
MADCO	MAD102084	22100000415	Shoulder Paving Avenue 12	Shoulder paving of 4 feet on each side of the roadway on Avenue 12 from Road 23 to Road 19 for a distance of 4 miles	Shoulder Paving	\$762,000 1.04
MADCO	MAD102085	22100000416	Shoulder Paving Avenue 18 1/2	Shoulder paving of 4 feet on each side of the roadway on Avenue 18 1/2 from Golden State Boulevard to 5 miles west for a distance of 5 miles	Shoulder Paving	\$998,000 1.04
MADCO	MAD102086	22100000417	Shoulder Paving Robertson Boulevard	Shoulder paving of 4 feet on each side of the roadway on Robertson Boulevard from SR 152 to Avenue 18 1/2 for a distance of 5.4 miles	Shoulder Paving	\$1,126,000 1.04
MADCITY	MAD217037	22100000412	Alley Paving Various Locations	Alley Paving (currently unpaved) 10-15 locations throughout the City of Madera	Alley Paving	\$690,000 1.10
MADCITY	MAD217040	22100000421	Traffic Signalization D Street and South Street	New Traffic Signal on D Street and South Street	Traffic Signal	\$450,000 5.02
MADCITY	MAD217041	22100000422	Traffic Signalization Cleveland Avenue and Granada Drive	New Traffic Signal on Cleveland Avenue and Granada Drive	Traffic Signal	\$450,000 5.02
CHOWCITY	MAD302053	22100000289	Ave 24 1/2 Shoulder Paving	Ave 24 1/2 - UPRR to Road 15 1/2 - Shoulder Paving	Shoulder Paving	\$300,000 1.04
CHOWCITY	MAD302057	22100000409	Alley Paving	Robertson/Kings & Robertson/Trinity Alley Paving Project (currently unpaved)	Alley Paving	\$759,000 1.10
TCM2 - Public Transit						
CHOWCITY	MAD313036	22100000295	CATX	Operating Assistance	FTA Section 5311	\$906,000 2.01
MADCO	MAD113041	22100000298	County	Operating Assistance	FTA Section 5311	\$3,498,000 2.01
MADCO	MAD113049	22100000397	MCC Preventative Maintenance	Operating Assistance	FTA Section 5311	\$662,000 2.01
MADCO	MAD113401	22100000433	MCC	Operating Assistance	FTA Section 5307	\$5,150,000 2.01
MADCO	MAD113402	22100000434	MCC Preventative Maintenance	Operating Assistance	FTA Section 5307	\$662,000 2.01
MADCITY	MAD213091	22100000302	DAR	Operating Assistance	FTA Section 5307	\$5,150,000 2.01
MADCITY	MAD213092	22100000303	MAX	Operating Assistance	FTA Section 5307	\$5,382,000 2.01
MADCITY	MAD213093	22100000304	Intermodal Center	Operating Assistance	FTA Section 5307	\$912,000 2.01
MADCITY	MAD213094	22100000321	MAX Preventative Maintenance	Operating Assistance	FTA Section 5307	\$1,138,000 2.01
MADCITY	MAD213104	22100000403	Transit Facility Operating Assistance	Operating Assistance	FTA Section 5307	\$420,000 2.01
MADCITY	MAD213105	22100000404	Bus Shelters	Bus Shelters	FTA Section 5307	\$160,000 2.07
MADCO	MAD113410	22100000442	Madera County	Bus Stop Shelter and Amenities	FTA Section 5307	\$674,000 2.07
TCM3 - Bicycle/Pedestrian Program						
MADCO	MAD102059	22100000249	Road 225	Creek Dr to Road 226	Construct Pedestrian Facilities	\$1,641,000 3.02
MADCITY	MAD202069	22100000284	Tulare St, Cleveland, Raymond Rd	Tulare, Cleveland, Raymond Road	Construct Bike/Ped Facilities	\$336,000 3.02
MADCITY	MAD202074	22100000315	Cleveland Avenue	Cleveland Avenue to Fresno River on MID	Construct Bike/Ped Facilities	\$379,000 3.02
MADCITY	MAD202083	22100000337	Schnoor Avenue	Sidewalk Construction Between Sunset Avenue and Fresno River	Construct Pedestrian Facilities	\$150,000 3.02
MADCITY	MAD202086	22100000340	Fresno River Trail	Between North-South Trail Behind Montecito Park and Granada Drive (Phase II)	Construct Bike/Ped Facilities	\$146,000 3.02
MADCITY	MAD217036	22100000411	Pedestrian Facilities Washington School	Around Elementary School	Construct Bike/Ped Facilities	\$368,000 3.02
MADCITY	MAD217038	22100000418	Pedestrian Bridge over Fresno River	Granada Avenue Pedestrian Bridge over the Fresno River	Construct Bike/Ped Facilities	\$2,500,000 3.02
CHOWCITY	MAD302058	22100000419	Pedestrian Improvements Project	Riverside Avenue, 8th Street, & Kings Avenue Pedestrian Improvements Project	Construct Bike/Ped Facilities	\$1,647,000 3.02
TCM5 - Alternative Fuels Program						
MADCITY	MAD213110	22100000423	Madera	Electric Vehicle Charging Station	EV Infrastructure	\$149,000 4.12
MADCITY	MAD217039	22100000420	Madera	Purchase New Electric Bus and Charging Facilities	Fleet Conversion/EV Infrastructure	\$586,000 4.12
MADCO	MAD115006	22100000400	Madera County	Purchase New Transit Vehicle	Fleet Conversion	\$554,000 2.10
MADCITY	MAD213201	22100000430	Madera	Purchase New Transit Vehicle	Fleet Conversion	\$300,000 2.10
MADCITY	MAD213202	22100000431	Madera	Purchase New Transit Vehicle	Fleet Conversion	\$300,000 2.10
MADCITY	MAD213203	22100000432	Madera	Purchase New Transit Vehicle	Fleet Conversion	\$300,000 2.10
MADCO	MAD113403	22100000435	Madera County	Purchase Three New Paratransit Vehicles	Fleet Conversion	\$430,000 2.10
MADCO	MAD113404	22100000436	Madera County	Purchase Five New Paratransit Vehicles (Electric)	Fleet Conversion	\$1,214,000 4.12
MADCO	MAD113405	22100000437	Madera County	Purchase Two Transit Vans	Fleet Conversion	\$109,000 2.10
MADCO	MAD113406	22100000438	Madera County	Purchase Three Vans (Electric)	Fleet Conversion	\$528,000 4.12
MADCO	MAD113407	22100000439	Madera County	Purchase Van (Electric)	Fleet Conversion	\$194,000 4.12
MADCO	MAD113408	22100000440	Madera County	Purchase Van (Electric)	Fleet Conversion	\$201,000 4.12
MADCO	MAD113409	22100000441	Madera County	Transit Electric Infrastructure Improvements	EV Infrastructure	\$1,000,000 4.12
MADCITY	MAD215004	22100000402	Madera	Purchase New Transit Vehicle (Formula)	Fleet Conversion	\$238,000 4.12
MADCO	MAD115010	22100000426	Madera County	Purchase New Van	Fleet Conversion	\$57,000 2.10
MADCO	MAD115020	22100000443	Madera County	Purchase New Van (Electric) (Formula)	Fleet Conversion	\$183,000 4.12
MADCO	MAD115021	22100000444	Madera County	Purchase New Van (Electric) (Formula)	Fleet Conversion	\$191,000 4.12
MADCO	MAD115022	22100000445	Madera County	Purchase New Van (Electric) (Formula)	Fleet Conversion	\$201,000 4.12

APPENDIX C

CONFORMITY ANALYSIS DOCUMENTATION

2022 RTP Conformity Analysis Results Summary -- Madera

PM-10	Total On-Road Exhaust		Paved Road Dust		Unpaved Road Dust		Road Construction Dust		Total	
	PM-10	Nox	PM-10	Nox	PM-10	Nox	PM-10	Nox	PM-10	Nox
2022	0.281	2.859	0.803		0.511		0.029		1.6	2.9
2029	0.266	1.494	0.789		0.511		0.191		1.8	1.5
2037	0.275	1.249	0.781		0.511		0.367		1.9	1.2
2046	0.281	1.162	0.817		0.511		0.029		1.6	1.2

Standard	Analysis Year	Emissions Total		DID YOU PASS?	
		ROG (tons/day)	NOx (tons/day)	ROG	NOx
2008 and 2015 Ozone	2023 Budget	1.1	2.7		
	2023	1.0	2.0	YES	YES
	2026 Budget	1.0	2.5		
	2026	0.8	1.7	YES	YES
	2029 Budget	0.9	2.4		
	2029	0.7	1.5	YES	YES
	2031 Budget	0.8	2.3		
	2031	0.7	1.4	YES	YES
	2037	0.5	1.3	YES	YES
	2046	0.5	1.2	YES	YES

Standard	Analysis Year	Emissions Total		DID YOU PASS?	
		PM-10 (tons/day)	NOx (tons/day)	PM-10	NOx
PM-10	2020 Budget	2.5	4.7		
	2022	1.6	2.9	YES	YES

MADERA COUNTY TRANSPORTATION COMMISSION
 Conformity Analysis for the 2023 FTIP and 2022 RTP

	2020 Budget	2.5	4.7		
	2029	1.8	1.5	YES	YES
	2020 Budget	2.5	4.7		
	2037	1.9	1.2	YES	YES
	2020 Budget	2.5	4.7		
	2046	1.6	1.2	YES	YES

Standard	Analysis Year	Emissions Total		DID YOU PASS?	
		PM2.5 (tons/day)	NOx (tons/day)	PM2.5	NOx
1997 24-Hour PM2.5 Standard	2020 Budget	0.2	4.2		
	2021	0.2	2.1	YES	YES
	2020 Budget	0.2	4.2		
	2029	0.2	1.5	YES	YES
	2020 Budget	0.2	4.2		
	2037	0.2	1.3	YES	YES
	2020 Budget	0.2	4.2		
2046	0.2	1.2	YES	YES	

	Analysis Year	Emissions Total		DID YOU PASS?	
		PM2.5 (tons/day)	NOx (tons/day)	PM2.5	NOx
1997 Annual PM2.5 Standard	2023 Budget	0.2	2.5		
	2021	0.2	2.1	YES	YES
	2023 Budget	0.2	2.5		
	2029	0.2	1.5	YES	YES
	2023 Budget	0.2	2.5		
	2037	0.2	1.3	YES	YES
	2023 Budget	0.2	2.5		
2046	0.2	1.2	YES	YES	

MADERA COUNTY TRANSPORTATION COMMISSION
 Conformity Analysis for the 2023 FTIP and 2022 RTP

Standard	Analysis Year	Emissions Total		DID YOU PASS?	
		PM2.5 (tons/day)	NOx (tons/day)	PM2.5	NOx
2006 PM2.5 Winter 24-Hour Standard	2023 Budget	0.2	2.6		
	2023	0.2	2.2	YES	YES
	2024 Budget	0.2	2.5		
	2024	0.2	2.0	YES	YES
	2024 Budget	0.2	2.5		
	2031	0.2	1.5	YES	YES
	2024 Budget	0.2	2.5		
	2037	0.2	1.3	YES	YES
	2024 Budget	0.2	2.5		
	2046	0.2	1.2	YES	YES

Standard	Analysis Year	Emissions Total		DID YOU PASS?	
		PM2.5 (tons/day)	NOx (tons/day)	PM2.5	NOx
2012 Annual PM2.5 Standard (Moderate)	2022 Budget	0.2	3.5		
	2022	0.2	2.9	YES	YES
	2022 Budget	0.2	3.5		
	2025	0.2	1.8	YES	YES
	2022 Budget	0.2	3.5		
	2029	0.2	1.5	YES	YES
	2022 Budget	0.2	3.5		
	2037	0.2	1.3	YES	YES
	2022 Budget	0.2	3.5		
	2046	0.2	1.2	YES	YES

UPCOMING BUDGET TEST

(Note: EPA Action is Pending as of This Analysis; The 2012 PM2.5 Moderate Budget Test Above Will be Used if EPA Doesn't Determine Adequacy or Approval of the New Serious Area Budgets before Federal Approval of the 2022 RTP Conformity Analysis)

Standard	Analysis Year	Emissions Total		DID YOU PASS?	
		PM2.5 (tons/day)	NOx (tons/day)	PM2.5	NOx
2012 Annual PM2.5 Standard (Serious)	2022 Budget	0.2	3.5		
	2022	0.2	2.9	YES	YES
	2025 Budget	0.2	2.3		
	2025	0.2	1.8	YES	YES
	2025 Budget	0.2	2.3		
	2029	0.2	1.5	YES	YES
	2025 Budget	0.2	2.3		
	2037	0.2	1.3	YES	YES
	2025 Budget	0.2	2.3		
	2046	0.2	1.2	YES	YES

**Road Construction
 Dust**

MADERA

Description	2022		2029		2037		2046	
	Year	Lane Miles	Year	Lane Miles	Year	Lane Miles	Year	Lane Miles
	Baseline	2005	1599	2022	1632	2029	1721	2037
Horizon	2022	1632	2029	1721	2037	1918	2046	1935
Difference	17	33	7	89	8	197	9	17
Lane Miles per Year		2		13		25		2
Acres Disturbed		8		49		96		7
Acre-Months		137		888		1719		132
Emissions (tons/year)		15.03 0		97.646		189.1 20		14.50 7
Annual Average Day Emissions (tons)		0.041		0.268		0.518		0.040
District Rule 8021 Control Rates		0.290		0.290		0.290		0.290
Total Emissions (tons per day)		0.029		0.190		0.368		0.028

*MADERA COUNTY TRANSPORTATION COMMISSION
Conformity Analysis for the 2023 FTIP and 2022 RTP*

Paved Road Dust Emissions (tons/day)									
MADERA 2022									
		VMT Daily	VMT (million/year)	Base Emissions (PM10 tpy)	Rain Adj. Emissions (PM10 tpy)	Rain Adj. Emissions (PM10 tons/day)	District Rule 8061/ISR Control Rates	Control- Adjusted Emissions	
Enter Freeway VMT ==>	Freeway	1,644,761	600	45.871	44.511	0.122	0.075	0.113	
Enter Arterial VMT ==>	Arterial	2,305,693	842	107.005	103.833	0.284	0.282	0.204	
Enter Collector VMT ==>	Collector	195,610	71	9.078	8.809	0.024	0.407	0.014	
	Urban	44,839	16	15.590	15.128	0.041	0.324	0.028	
and Rural Local VMT Here =>	Rural	121,849	44	183.261	177.828	0.487	0.090	0.443	
		166,688							
	Totals	4,312,752	1,574	360.806	350.109	0.959		0.803	
MADERA 2029									
		VMT Daily	VMT (million/year)	Base Emissions (PM10 tpy)	Rain Adj. Emissions (PM10 tpy)	Emissions (PM10 tons/day)	Rule 8061/ISR Control	Control- Adjusted Emissions	
Enter Freeway VMT ==>	Freeway	1,918,947	700	53.518	51.931	0.142	0.075	0.132	
Enter Arterial VMT ==>	Arterial	2,001,902	731	92.906	90.152	0.247	0.282	0.177	
Enter Collector VMT ==>	Collector	198,250	72	9.201	8.928	0.024	0.407	0.015	
	Urban	44,270	16	15.392	14.936	0.041	0.324	0.028	
and Rural Local VMT Here =>	Rural	120,301	44	180.934	175.570	0.481	0.090	0.438	
		164,571							
	Totals	4,283,670	1,564	351.951	341.517	0.936		0.789	
MADERA 2037									
		VMT Daily	VMT (million/year)	Base Emissions (PM10 tpy)	Rain Adj. Emissions (PM10 tpy)	Emissions (PM10 tons/day)	Rule 8061/ISR Control	Control- Adjusted Emissions	
Enter Freeway VMT ==>	Freeway	2,033,562	742	56.715	55.033	0.151	0.075	0.139	
Enter Arterial VMT ==>	Arterial	2,129,891	777	98.846	95.916	0.263	0.282	0.189	
Enter Collector VMT ==>	Collector	229,653	84	10.658	10.342	0.028	0.407	0.017	
	Urban	41,497	15	14.428	14.000	0.038	0.324	0.026	
and Rural Local VMT Here =>	Rural	112,766	41	169.601	164.572	0.451	0.090	0.410	
		154,262							
	Totals	4,547,368	1,660	350.247	339.863	0.931		0.781	
MADERA 2046									
		VMT Daily	VMT (million/year)	Base Emissions (PM10 tpy)	Rain Adj. Emissions (PM10 tpy)	Emissions (PM10 tons/day)	Rule 8061/ISR Control	Control- Adjusted Emissions	
Enter Freeway VMT ==>	Freeway	2,169,773	792	60.514	58.719	0.161	0.075	0.149	
Enter Arterial VMT ==>	Arterial	2,125,932	776	98.663	95.737	0.262	0.282	0.188	
Enter Collector VMT ==>	Collector	251,508	92	11.672	11.326	0.031	0.407	0.018	
	Urban	43,895	16	15.262	14.809	0.041	0.324	0.027	
and Rural Local VMT Here =>	Rural	119,282	44	179.401	174.082	0.477	0.090	0.434	
		163,177							
	Totals	4,710,390	1,719	365.511	354.674	0.972		0.817	

MADERA COUNTY TRANSPORTATION COMMISSION
Conformity Analysis for the 2023 FTIP and 2022 RTP

Unpaved Road Dust Emissions (tons/day)

MADERA 2022

	Miles	Vehicle Passes per Day	VMT (1000/year)	Base Emissions (PM10 tpy)	Rain Adj. Emissions (PM10 tpy)	Rain Adj. Emissions (PM10 tons/day)	District Rule 8061/ISR Control Rates	Control-Adjusted Emissions
City/County	87.0	10	317.6	317.550	279.891	0.767	0.333	0.511

MADERA 2029

	Miles	Vehicle Passes per Day	VMT (1000/year)	Base Emissions (PM10 tpy)	Rain Adj. Emissions (PM10 tpy)	Rain Adj. Emissions (PM10 tons/day)	District Rule 8061/ISR Control Rates	Control-Adjusted Emissions
City/County	87.0	10	317.6	317.550	279.891	0.767	0.333	0.511

MADERA 2037

	Miles	Vehicle Passes per Day	VMT (1000/year)	Base Emissions (PM10 tpy)	Rain Adj. Emissions (PM10 tpy)	Rain Adj. Emissions (PM10 tons/day)	District Rule 8061/ISR Control Rates	Control-Adjusted Emissions
City/County	87.0	10	317.6	317.550	279.891	0.767	0.333	0.511

MADERA 2046

	Miles	Vehicle Passes per Day	VMT (1000/year)	Base Emissions (PM10 tpy)	Rain Adj. Emissions (PM10 tpy)	Rain Adj. Emissions (PM10 tons/day)	District Rule 8061/ISR Control Rates	Control-Adjusted Emissions
City/County	87.0	10	317.6	317.550	279.891	0.767	0.333	0.511

APPENDIX D

**TIMELY IMPLEMENTATION DOCUMENTATION FOR
TRANSPORTATION CONTROL MEASURES**

MADERA COUNTY TRANSPORTATION COMMISSION

Conformity Analysis for the 2023 FTIP and 2022 RTP

RACM Commitment	Agency	Measure Title	Measure Description (not verbatim)	Implementation Status (as of July 2021)	Conformity Analysis for the Implementation Status 2023 FTIP/2022 RTP (as of May 2022)
MA 3.1	MCTC	Commute Solutions	<p>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.</p> <p>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</p>	<p>MCTC continues to provide commute solutions information through the Public Awareness Program. MCT C staff have focused on improving communication for all matters in virtual settings in response to the COVID-19 Pandemic. The Public Awareness Program will continue to evolve to utilize new and effective communication practices that have materialized during the pandemic period.</p>	<p>MCTC continues to provide commute solutions information through the Public Awareness Program. MCT C staff have focused on improving communication for all matters in virtual settings in response to the COVID-19 Pandemic. The Public Awareness Program will continue to evolve to utilize new and effective communication practices that have materialized during the pandemic period.</p>
MA 14.1 (MA 11.2, MA 11.6, MA 13.3, 13.4, TCM3,)	MCTC	Area wide Public Awareness Programs	<p>(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</p>	<p>The MCTC Public Awareness Program is an ongoing annual program. MCTC staff engages with the public verbally, in writing, through social media and electronic mailings. MCT C staff have focused on improving communication for all matters in virtual settings in response to the COVID-19 Pandemic. The Public Awareness Program will continue to evolve to utilize new and effective communication practices that have materialized during the pandemic period.</p>	<p>The MCTC Public Awareness Program is an ongoing annual program. MCTC staff engages with the public verbally, in writing, through social media and electronic mailings. MCT C staff have focused on improving communication for all matters in virtual settings in response to the COVID-19 Pandemic. The Public Awareness Program will continue to evolve to utilize new and effective communication practices that have materialized during the pandemic period.</p>

MADERA COUNTY TRANSPORTATION COMMISSION
Conformity Analysis for the 2023 FTIP and 2022 RTP

			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.		
MA 5.2	City of Madera	Cleveland Avenue	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 FTIP CMAQ programming cycle). Signal coordination is not warranted on Cleveland Ave. at this time and will continue to be monitored for suitability.	The City of Madera reviews its signal systems (4 or more contiguous in accordance with the FTIP CMAQ programming cycle). Signal coordination is not warranted on Cleveland Ave. at this time and will continue to be monitored for suitability.
		Gateway Drive: coordinate five signals	In Madera, Gateway Drive from 4th Street to Olive Avenue: signal coordination	Complete	

APPENDIX E
PUBLIC MEETING PROCESS DOCUMENTATION

NOTICE OF PUBLIC HEARING ON THE

DRAFT 2023 FEDERAL TRANSPORTATION IMPROVEMENT PROGRAM, THE DRAFT 2022 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITY STRATEGY, CORRESPONDING DRAFT CONFORMITY ANALYSIS, AND NOTICE OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT (SCH # 2021030268)

NOTICE IS HEREBY GIVEN that the Madera County Transportation Commission will hold a public hearing on July 20, 2022 at 3:00 p.m. The meeting will be conducted through a hybrid combination of in-person and/or all virtual attendance of the six members of the Policy Board at 2001 Howard Road, Suite 201, Madera, CA 93637 or via teleconference using the GoToWebinar platform regarding the Draft 2023 Federal Transportation Improvement Program (2023 FTIP), the Draft 2022 Regional Transportation Plan/Sustainable Community Strategy (2022 RTP/SCS), the corresponding Draft Air Quality Conformity Analysis for the 2023 FTIP and 2022 RTP/SCS and the Draft Environmental Impact Report (EIR). The purpose of the public hearing is to receive public comments on these documents.

- The 2023 FTIP is a near-term listing of capital improvement and operational expenditures utilizing federal and state monies for transportation projects in Madera County during the next four years.
- The 2022 RTP/SCS is a long-term coordinated transportation/land use strategy to meet Madera County transportation needs out to the year 2046.
- The EIR document provides an analysis of potential environmental impacts related to the implementation of the RTP/SCS as required by the California Environmental Quality Act.
- The corresponding Conformity Analysis contains the documentation to support a finding that the 2023 FTIP and 2022 RTP/SCS meet the air quality conformity requirements for ozone and particulate matter.

REASONABLE ACCOMMODATIONS: Persons who require accommodation for any audio, visual or other disability or Spanish or other interpretation in order to review an agenda, or to participate in a meeting of the Policy Board of the Madera County Transportation Commission per the American Disabilities Act (ADA), may obtain assistance by requesting such accommodation telephonically by calling (559) 675-0721 or in writing addressed to the Administrative Analyst, 2001 Howard Road, Suite 201, Madera, California, 93637 or email sandy@maderactc.org. Any such request for accommodation should be made at least 3 business days prior to the scheduled meeting for which assistance is requested.

The public review and comment period for each of the documents listed above are as follows:

- 55 days commencing on June 29, 2022 and ending on August 23, 2022 for the 2022 RTP/SCS;
- 45 days commencing on June 29, 2022 and ending on August 13, 2022 for the Draft EIR; and
- 30 days commencing on June 29, 2022 and ending on July 29, 2022 for the 2023 FTIP and Draft Air Quality Conformity Analysis.

Based on the analysis presented in the Draft EIR, potentially significant and unavoidable direct and cumulative environmental impacts may occur to the following resources areas:

Aesthetics, Agricultural and Forestry Resources, Air Quality, Biological Resources, Climate Change, Cultural Resources & Tribal Cultural Resources, Energy and Energy Conservation, Geology/Soils/Mineral Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use, Planning, and Recreation, Noise and Vibration, Population, Housing, and Employment, Public Utilities, Other Utilities, and Services Systems, Transportation/Traffic, and Wildfire. Although the 2023 FTIP and the 2022 RTP/SCS include areas containing sites that are subject to Government Code 65962.5, neither the 2023 FTIP nor the 2022 RTP/SCS propose site-specific development of any of those locations.

The draft documents are available for review at the Madera County Transportation Commission office, located at 2001 Howard Road, Suite 201, Madera, CA 93637 and on the Madera County Transportation Commission website at www.maderactc.org

Public comments are welcomed at the hearing, or may be submitted in writing by 5:00 p.m. on the aforementioned dates to staff identified below.

After considering the comments, the documents will be considered for adoption, by resolution, by the Madera County Transportation Commission at a regularly scheduled meeting to be held on August 31, 2022. The documents will then be submitted to state and federal agencies for approval.

Contact Persons:

Draft 2022 RTP, Conformity Analysis, EIR

- Dylan Stone, Principal Regional Planner
2001 Howard Road, Suite 201
Madera, CA 93637
dylan@maderactc.org
(559) 675-0721

Draft 2023 FTIP

- Jeff Findley, Principal Regional Planner
2001 Howard Road, Suite 201
Madera, CA 93637
jeff@maderactc.org
(559) 675-0721

APPENDIX F
RESPONSE TO PUBLIC COMMENTS

No comments were received.

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

RESOLUTION ADOPTING THE MADERA COUNTY TRANSPORTATION COMMISSION 2023 FEDERAL TRANSPORTATION IMPROVEMENT PROGRAM, THE 2022 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITY STRATEGY, AND THE CORRESPONDING CONFORMITY ANALYSIS

Resolution No.: 22-13

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, Senate Bill (SB) 375 (Steinberg, 2008) requires that Metropolitan Planning Organizations prepare a Sustainable Communities Strategy (SCS) as part of the 2022 RTP that demonstrates how the region will reduce the greenhouse gas emissions (GHG) from automobiles and light trucks to achieve, if there is a feasible way to do so, the applicable greenhouse gas emission reduction targets approved by the California Air Resources Board (ARB); and

WHEREAS, pursuant to SB 375, the applicable ARB per capita GHG emission reduction targets for the Madera County Transportation Commission are 10% below 2005 per capita emissions levels by 2020 and 16% below 2005 per capita emissions levels by 2035; and

WHEREAS, pursuant to SB 375, the SCS must: (1) identify the general location of uses, residential densities, and building intensities within the region; (2) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth; (3) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Government Code Section 65584; (4) identify a transportation network to service the transportation needs of the region; (5) gather and consider the

best practically available scientific information regarding resource areas and farmland in the region as defined in subdivisions (1) and (b) of the Government Code Sections 65080 and 65581; and (6) consider the statutory housing goals specified in Sections 65580 and 65581, (7) set forth a forecasted development pattern for the region which when integrated with the transportation network, and other transportation measures and policies, will reduce the GHG emissions from automobiles and light trucks to achieve the GHG reduction targets, and (8) allow the RTP to comply with air quality conformity requirements under the federal Clean Air Act; and

WHEREAS, the 2022 RTP/SCS has been prepared in accordance with state guidelines adopted by the California Transportation Commission; and

WHEREAS, a 2022 RTP/SCS has been prepared in full compliance with federal guidance; 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, projects submitted in the 2023 FTIP must be financially constrained and the financial plan affirms that funding is available; and

WHEREAS, the 2023 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 2023 FTIP program listing is consistent with: 1) the 2022 RTP/SCS; 2) the 2022 State Transportation Improvement Program; and 3) the Corresponding Conformity Analysis; and

WHEREAS, the 2023 FTIP contains the MPO's certification of the transportation planning process assuring that all federal requirements have been fulfilled; and

WHEREAS, the 2023 FTIP meets all applicable transportation planning requirements per 23 Code of Federal Regulations (CFR) Part 450; and

WHEREAS, Madera County Transportation Commission has established performance targets that address the performance standards per 23 CFR Part 490, 49 United States Code (U.S.C.) 5326(c), and 49 U.S.C. 5329(d) to use in tracking progress toward attainment of critical outcomes for the region of the MPO; and

WHEREAS, Madera County Transportation Commission has integrated into its metropolitan transportation planning process, directly or by reference, the goals, objectives, performance measures, and targets described in other State transportation plans and transportation processes, as well as any plans developed under 49 U.S.C. Chapter 53 by providers of public transportation, required as part of a performance-based program; and

WHEREAS, the MPO must demonstrate conformity per 40 CFR Part 93 for the 2022 RTP/SCS and 2023 FTIP; and

WHEREAS, the 2022 RTP/SCS and 2023 FTIP includes a new Conformity Analysis; and

WHEREAS, the 2022 RTP/SCS and 2023 FTIP conforms to the applicable SIPs; and

WHEREAS, the 2022 RTP/SCS and 2023 FTIP do not interfere with the timely implementation of the Transportation Control Measures; and

WHEREAS, the documents have been widely circulated and reviewed by the 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 the public participation process adopted by the Madera County Transportation Commission; and

WHEREAS, a public hearing was conducted on July 20, 2022 to hear and consider comments on the 2022 RTP/SCS, 2023 FTIP, and Corresponding Conformity Analysis.

NOW, THEREFORE, BE IT RESOLVED, that the Madera County Transportation Commission adopts the 2022 RTP/SCS, 2023 FTIP, and Corresponding Conformity Analysis.

BE IT FURTHER RESOLVED, that the Madera County Transportation Commission finds that the 2022 RTP/SCS and 2023 FTIP are in conformity with the requirements of the Federal Clean Air Act Amendments and applicable State Implementation Plans for air quality.

BE IT FURTHER RESOLVED, that the Madera County Transportation Commission also finds that the 2022 RTP/SCS meets the SB 375 GHG reduction targets of 10% below 2005 per capita emissions levels by 2020 and 16% below 2005 per capita emissions levels by 2035.

THE FOREGOING RESOLUTION was passed and adopted by the Madera County Transportation Commission this 31st day of August 2022 by the following vote:

Commissioner Wheeler	<u>Yes</u>
Commissioner Palmer	<u>Yes</u>
Commissioner Gallegos	<u>Yes</u>
Commissioner Rodriguez	<u>Yes</u>
Commissioner Frazier	<u>Yes</u>
Commissioner Poythress	<u>Yes</u>




Chairman, Madera County Transportation Commission



Executive Director, Madera County Transportation Commission

I hereby certify that the foregoing is a true copy of a resolution of the Madera County Transportation Commission duly adopted at a regular meeting thereof held on the 31st day of August 2022.

Signed: _____


Executive Director