

Air Quality Memorandum

MEMO # 2017TIP-1

DATE July 15, 2016

FROM Cache Metropolitan Planning Organization

SUBJECT CONFORMITY DETERMINATION FOR THE 2017-2022 TRANSPORTATION IMPROVEMENT PROGRAM FOR THE CACHE MPO

ABSTRACT The Fixing America’s Surface Transportation (FAST) Act and the Clean Air Act Amendments (CAAA) require that all regionally significant highway and transit projects in air quality nonattainment and maintenance areas be derived from a “conforming” Transportation Plan (Plan) and Transportation Improvement Program (TIP). A conforming Plan or Program is one which has been analyzed for emissions of controlled air pollutants and found to satisfy emission level limits established in the State Implementation Plan (SIP) for air quality. This conformity analysis is made by the Cache Metropolitan Planning Organization (MPO) to be submitted to the Federal Highway Administration and the Federal Transit Administration for their concurrence. This conformity analysis is being prepared under the Transportation Conformity Regulations promulgated by EPA in April 2012.

Section 93.122(g)(1) Subparagraphs 1 through 4 of the 2012 Conformity Regulations (40 CFR part 93) states “Conformity determinations for a new ... TIP may be demonstrated to satisfy the requirements of ... Section 93.118 without new regional emissions analysis if the previous regional emissions analysis also applies to the new ... TIP.” Section 93.122 includes the following four conditions. First, the TIP must include all projects that must be started within the TIP time frame in order to achieve the transportation network envisioned in the plan. Second, all regionally significant projects in the TIP must be included in the regional emissions analysis. Third, the design concept and scope for TIP projects must not have changed significantly from the plan. And fourth, the previous regional emissions analysis is consistent with current emission budgets or interim conformity requirements as applicable. As discussed below, the CMPO 2017-2022 TIP meets the conditions of CFR 93.122(g)(1) and therefore conforms to Transportation Conformity Regulations for particulate emissions and precursor emissions (NOx & VOCs) in the Logan PM_{2.5} non-attainment area. Therefore, all the transportation projects in Cache County included in the 2017-2022 TIP may be found to conform.

Transportation Improvement Program (TIP)

The Cache Metropolitan Planning Organization's (CMPO) Transportation Improvement Program (TIP) is a six-year program which plans for the development of collector and above type roads of regional importance, highway, transit, pedestrian, and bicycle projects for the urbanized area. It is a compilation of projects from the various federal, state, and local funding programs for all the cities in the region, as well as for the Utah Department of Transportation and the Cache Valley Transit Districts. Projects included in the program will implement the Long Range Highway and Transit Plans for the Region, meet the short range needs of the area, and provide for the maintenance of the existing transportation system. The Logan Urbanized Area includes: Wellsville, Hyrum, Nibley Millville, Providence, River Heights, Logan, North Logan, Hyde Park, Smithfield, and Cache County.

TIP Timeframe

All projects which must be started no later than 2022 in order to achieve the transportation system envisioned by the CMPO 2040 Regional Transportation Plan are included in the 2017-2022 Transportation Improvement Program (TIP). Implementing these projects within the TIP time frame is dependent on available funding. Funding availability is based on the most reasonable assumptions available at the time the RTP was prepared. Projects in the RTP are considered “financially constrained”, that is, they are not included in the RTP without identifying a reasonable funding source.

Regionally Significant

All regionally significant projects, regardless of funding source (federal, state, or local) are included in the TIP and RTP. All regionally significant projects are also included in the regional emissions analysis. Regionally significant projects are identified as those projects involving a new or existing principal arterial or select minor arterials identified by Interagency Consultation. The most recent Utah Department of Transportation Functional Classification map was used to identify principal arterials.

In addition to the regionally significant transportation projects which were identified and included in the regional emissions analysis, it is the practice of CMPO to include a number of minor arterials and collectors in the travel model in order to produce a more accurate model of current and future traffic conditions. Including minor arterials and collectors in the travel model does not mean these facilities should be treated as regionally significant facilities.

Concept and Scope

The design concept and scope of all regionally significant projects in the TIP have not changed significantly from the design and scope identified in the Plan.

Emission Budget Test

On September 11, 2015 the EPA published an “Adequacy Determination for the Cache County PM2.5 Attainment Plan’s Motor Vehicle Emissions Budgets for Transportation Conformity Purposes” in the Federal Register. The CMPO adopted its updated RTP on June 15, 2015. The conformity analysis completed for this RTP update (2040RTP-1 Report dated June 2015) established air quality transportation conformity by meeting both the SIP Motor Vehicle Emission Budget (MVEB) and the “interim” emission budget conformity test (at the time the EPA MVEB adequacy determination for the Cache was out for public comment and not yet finalized so both were tests were

considered). It is the conclusion of this report that the conformity regulations for the Logan PM_{2.5} non-attainment area have been satisfied as documented in Air Quality Memorandum# 2040RTP-1 (See Federal Highway Administration concurrence letter date August 16, 2015). The CMPO's Draft 2017-2022 TIP is considered to have met the transportation conformity regulations since all projects included in the 2017-2022 CMPO TIP were part of the RTP conformity determination documented in 2040RTP-1.

Public Comment

The CMPO 2017-2022 TIP was made available for public inspection and comment from July 20, 2016 to August 19, 2016. Air Quality Memorandum and 2040RTP-1 & 2017TIP-1 (this document) are also available to the public upon request.

List of Acronyms

ADT	Average Daily Traffic
CAAA	Clean Air Act Amendments
CMPO	Cache Metropolitan Planning Organization
COG	Cache Council of Governments
CTAC	Cache Technical Advisory Committee
CVTD	Cache Valley Transit District
DOT	U.S. Department of Transportation
EPA	U.S. Environmental Protection Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
HPMS	Highway Performance Management System
IDOT	Idaho Department of Transportation
IDEQ	Idaho Department of Environmental Quality
MPO	Metropolitan Planning Organization
NAAQS	National Ambient Air Quality Standard
NEPA	National Environmental Policy Act
PM 2.5	Particulate Matter less than 2.5 micrometers
RTP	Regional Transportation Plan
SIPs	State Implementation Plans
STIP	Statewide Transportation Improvement Program
STP	Federal Surface Transportation Program Funds
TIP	Transportation Improvement Program
VMT	Vehicle Miles Traveled



U.S. Department
Of Transportation

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August 16, 2015

Mr. Carlos Braceras, Executive Director
Utah Department of Transportation (Box 1245)
4501 South 2700 West
Salt Lake City, Utah 84119

Subject: Conformity Finding for the Cache Metropolitan Planning Organization (CMPO)
2040 Metropolitan Transportation Plan

Dear Mr. Njord:

Thank you for the opportunity of reviewing the Utah Unified Transportation Plan documents. We have appreciated the opportunity of participating with the Utah Department of Transportation (UDOT), the Utah Transit Authority, and the four Metropolitan Planning Organizations in Utah in the development of these transportation plans. We believe that a conscientious effort was made to address the requirements of MAP-21 and associated guidance issued on important transportation planning related issues.

In accordance with the Clean Air Act of 1990, as amended, conformity findings of the transportation plans and programs in non-attainment and maintenance areas are required of the U.S. Department of Transportation. Based on our evaluation of the Cache Metropolitan Planning Organization (CMPO) conformity determination, made in its capacity as the Metropolitan Planning Organization for the Logan, Utah urbanized area, and in coordination with the U. S. Environmental Protection Agency (EPA), the Federal Transit Administration (FTA), the Utah Department of Transportation (UDOT), and the Utah Division of Air Quality (DAQ), we have concluded that the conformity determination of the subject CMPO metropolitan transportation plan has met the conformity regulation for the Cache County, Utah/Franklin County Idaho PM_{2.5} non-attainment area. **Accordingly, the Federal Highway Administration, on behalf of both the Federal Transit Administration and the Federal Highway Administration, makes a conformity finding for the subject Transportation Plan.**

This conformity finding remains in effect until such time as a new finding is required, either by new regulatory requirements, major revision of the transportation plan, or a revision to the State Implementation Plan.

If you have any questions regarding this approval action, please contact Kristin Kenyon at (720) 963-3319 or Steve Call at (801) 955 -3513.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve A. Call". The signature is fluid and cursive, with the first name "Steve" and last name "Call" clearly distinguishable.

Steven A. Call, P.E.
Program Development Team Leader
Federal Highway Administration

cc: Shane Marshall, UDOT

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