Air Quality Memorandum

MEMO #  2018TIP-1

DATE   July 15, 2017

FROM   Cache Metropolitan Planning Organization

SUBJECT   CONFORMITY DETERMINATION FOR THE 2018-2023 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 2018-2023 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 2018-2023 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 2023 in order to achieve the transportation system envisioned by the CMPO 2040 Regional Transportation Plan are included in the 2018-2023 Transportation Improvement Program (TIP). Implementing these projects within the TIP timeframe 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 2018-2023 TIP is considered to have met the transportation conformity regulations since all projects included in the 2018-2023 CMPO TIP were part of the RTP conformity determination documented in 2040RTP-1.

**Public Comment**
The CMPO 2018-2023 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**

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