

Appendix G

Advertisements Announcing Opportunities for Public Comment on Air Quality Conformity Determination

Central Lane Metropolitan Planning Organization

From: Central Lane Metropolitan Planning Organization
Sent: Friday, December 02, 2011 11:42 AM
To: Central Lane Metropolitan Planning Organization
Subject: Central Lane Metropolitan Planning Organization - Opportunity for Public Comment on two draft Documents

This message tells about public comment opportunities for the update of the Metropolitan Transportation Improvement Program (MTIP) and the Air Quality Conformity Determination (AQCD). Both are regional transportation planning documents produced by the Central Lane Metropolitan Planning Organization (MPO). There is a hearing and a public comment period for both draft documents. The deadline for comments 5:00 PM Monday, January 9, 2012

The Central Lane Metropolitan Planning Organization (MPO) is the federally designated regional transportation planning organization for the Eugene-Springfield-Coburg area. The MPO is updating its short range transportation plan and the air quality analysis:

MTIP is the Metropolitan Transportation Improvement Program

The MTIP lists projects from the Regional Transportation Plan that can be funded within 2-4 years. It tells how our area plans to use local, state and federal dollars to build and operate projects.

The MTIP includes:

- Transit and transit-related improvements
- Highways and roadways
- Bicycle and pedestrian projects
- Other surface transportation improvements

AQCD is the Air Quality Conformity Determination

Our area has good air quality and we want to keep it that way. One of the ways we do that is to use a computer model to check whether building the projects in our transportation plans will cause our region to exceed the limit for motor vehicle pollution. The draft AQCD has found that our area still will meet state and federal standards for air quality even after all the projects in the short range (MTIP) and long range (Regional Transportation Plan) are built.

Opportunities to Comment

Comments submitted before 5:00 PM on Monday, January 9, 2012 will be sent to decision makers to consider as part of the adoption process at their regular meeting on January 12, 2012. There are several ways to submit comments.

Public Hearing

Metropolitan Policy Committee

Thursday, December 8, 2011

11:30 AM

Eugene Public Library, Bascom-Tykeson Room

100 West 10th Avenue, Eugene

Website: www.theMPO.org

Email: mpo@lcoq.org

Mail: Lane Council of Governments
859 Willamette Street, Suite 500
Eugene, OR 97401-2910
(Please note: our office is closed over the noon hour.)

Want to review the draft documents?

Click www.theMPO.org or go to the Eugene or Springfield Public Library.

Need more information?

Call Paul Thompson, Senior Planner, Lane Council of Governments, 541.682.4405.

You received this email because expressed an interest in transportation planning in the Eugene-Springfield area. If you wish to be removed from list, please go to www.thempo.org/how_to_help/get_updates.cfm login and unsubscribe. Or, please send an email request to mpo@lcog.org.



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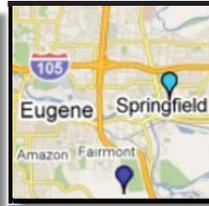
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Our transportation system, with its vast network of roads, bus routes, rail lines, sidewalks, and bicycle lanes, is the backbone of our region. Discover how the [Central Lane Metropolitan Planning Organization](#) is working to improve transportation in the Eugene-Springfield metropolitan area by planning for our future transportation system, investing in transportation projects, and expanding travel options. Find out how you can [help shape plans and projects](#).

[Current Projects](#) (MTIP 2010-2013)



[Long-Range Projects](#) (RTP 2025)



Central Lane MPO Calendar

December 2011						
Su	Mo	Tu	We	Th	Fr	Sa
27	28	29	30	1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31
1	2	3	4	5	6	7

Click green days for events

What's New



RTP Upcoming Events

Public Comment deadline - Dec. 5, 2011
MPC Final Action on Plan - Dec. 8, 2011

Click on the RTP Update image above for more information



MTIP Upcoming Events

Public Hearing - Dec. 8, 2011
Public Comment deadline - Jan. 9, 2012
MPC Discussion on Final Draft Plan - Jan. 12, 2012

Click on the MTIP Update image above for more information

The Central Lane Metropolitan Planning Organization (MPO) is updating its **Air Quality Conformity Determination (AQCD)**.

AQCD Upcoming Events

Public Hearing - Dec. 8, 2011
Public Comment deadline - Jan. 9, 2012
MPC Discussion on Final Draft Plan - Jan. 12, 2012

Click [here](#) for more information



LCOG releases New Smartphone Application to help local planners better serve area bicyclists!

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News and Events

The Central Lane Metropolitan Planning Organization (MPO) is updating its Air Quality Conformity Determination (AQCD). There is a hearing and a public comment period for the draft document. **The deadline for comments 5:00 PM Monday, January 9, 2012**

What is an Air Quality Conformity Determination (AQCD)?

Our area has good air quality and we want to keep it that way. One of the ways we do that is to use a computer model to check whether building the projects in our transportation plans will cause our region to exceed the limit for motor vehicle pollution. The draft AQCD has found that our area still will meet state and federal standards for air quality even after all the projects in the short range ([MTIP](#)) and long range ([Regional Transportation Plan](#)) are built.

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Email: mpo@lcog.org

Mail: Lane Council of Governments
859 Willamette Street, Suite 500
Eugene, OR 97401-2910
(Please note: our office is closed over the noon hour.)

Want to review the draft documents?

The draft document is available for review as part of the December MPC meeting materials, which can be accessed [here](#). The draft document is also available at the Eugene or Springfield Public Library.

Need more information?

Call Paul Thompson, Senior Planner, Lane Council of Governments, 541.682.4405.

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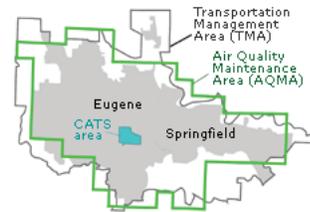
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In response to the Clean Air Act, the Environmental Protection Agency has established health-based National Ambient Air Quality Standards (NAAQS) for six air pollutants: particulate matter (PM10 and PM2.5), ozone, carbon monoxide (CO), sulfur dioxide, nitrogen dioxide, and lead. Areas that fail to meet the NAAQS are designated "non-attainment" and are required to develop plans to come into compliance with the standards.

Transportation conformity is a way to ensure that Federal funding and approval goes to those transportation activities that are consistent with the NAAQS. Conformity applies to transportation plans, transportation improvement programs (TIPs) and projects funded or approved by the Federal Highway Administration (FHWA) or the Federal Transit Administration (FTA) in areas that do not meet or previously have not met air quality standards for various pollutants. A conformity determination demonstrates that the total emissions projected for a plan or program are within the emissions limits ("budgets") established by the State Implementation Plan (SIP), and that transportation pollution control measures are implemented in a timely fashion.

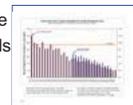


Air Quality Boundaries within the Central Lane MPO TMA

The Eugene-Springfield region has only two pollutants for which air quality conformity must be determined: particulate matter of less than 10 microns (PM10) and carbon monoxide (CO). The region is currently classified as [non-attainment](#) for PM10. Since it has been established that emissions from motor vehicles are not a significant contributing factor to overall PM10 emissions, *regional transportation conformity* is not required. Air quality conformity for PM10 must be demonstrated by [Lane Regional Air Protection Agency](#) (LRAPA). There has not been an exceedance of PM10 standards since 1987.

In 1994, the Eugene-Springfield area was classified as in [attainment](#) of the air quality standard for the pollutant carbon monoxide (CO) the majority of which is emitted by motor vehicles. The region is currently in the required 20 year maintenance period during which continued compliance with the Clean Air Act has to be demonstrated. There has not been an exceedance of the CO standards since 1980. Transportation conformity determinations must be made by the Central Lane MPO at least every three years, or when transportation plans or TIPs are updated. A public comment period and a public hearing are held before the MPO policy board adopts a conformity determination.

The most recent air conformity determination was approved for the 2031 Regional Transportation Plan (RTP) and the FFY08-11 Metropolitan Transportation Improvement Program on January 16, 2008. Analysis indicates that CO levels will continue to decline under current transportation plans and policies. [Measurements made by LRAPA](#) confirm that CO levels are well within the federal air quality standards.



Project Level Conformity. Hot spot CO analysis is required for all non-exempt projects within the AQMA. Further, within Lane County, LRAPA requires an [indirect source](#) permit for new construction or modifications of certain road, airport and parking facilities. Hot spot PM10 analyses are required for all projects within the Eugene-Springfield urban growth boundary.

Downloads:

Essentials of Air Quality Conformity: [in English, en Español](#) (17 KB PDF )

*Draft Conformity Determination - FFY12-15 Metropolitan Transportation Improvement Program and 2035 Regional Transportation Plan - **The Central Lane Metropolitan Planning Organization (MPO) is updating its Conformity Determination.** Click [here](#) for more information.*

[Complete Document](#), with maps and appendices (7.4MB PDF )

[Report](#) (without maps and appendices, 585KB PDF )

Maps:

[Map 3](#). 2012-2015 Projects (1.8 MB PDF )

[Map 4](#). 2035 Roadway Projects (404 KB PDF )

[Map 5](#). 2035 Bike/Ped Projects (415 KB PDF )

[Map 6](#). 2035 Transit Projects (1.9 MB PDF )

[Map 7](#). Nodal Development (370 KB PDF )

Appendices

[Appendix A](#). Supporting Documents (1.3 MB PDF )

[Appendices B-D](#). Project lists and AQ Model I/O (465 KB PDF )

[Appendix E](#). Exempt Projects and Functional Classification (1.6 MB, PDF )

[Appendix F](#). Maintenance Plan (164 KB PDF )

Appendix H

Response to Comments received during Public Comment Period

Comment, Public Hearing, December 8, 2011

“...said it was appropriate that the MPC meeting was being held while we are under a pollution advisory from LRAPA and the National Weather Service. He asked if the big polluters in Lane County had to reduce their emissions or just the little people. Asthma, cancer and heart disease were caused by pollution. He asked if Seneca had to turn off its incinerator because they spewed tons of crap into the air that we all have to breathe. He noted the cost of gas had increased significantly more than estimated in by LCOG 2004. He asked where the accountability was. It was getting more expensive to get oil out of the ground. The MPC should not give speeches on climate change while it continued to vote for more highways. “

Staff Response:

In general:

An Air Quality Conformity Determination (AQCD) responds to specific requirements to assure that the progress achieved in reducing a formerly excessive emission of a particular pollutant is not reversed if the plans being considered are executed. The AQCD assumes a project list is provided and analyzes the impact of that project list on the pollutants for which the area is required to monitor for transportation. The AQCD does not choose or make tradeoffs between projects. *Thus, the TIP and RTP project lists are not assessed in an AQCD for any issue other than the emission of carbon monoxide (CO) in this area.* The CO budget which must be met was set by LRAPA with concurrence by EQC and by USEPA at the time this area achieved the required air quality standard for CO. The emissions calculated for CO must be less than this budget for the AQCD to be approved.

1. Are other industries required to reduce their emissions?

The MPO is a transportation planning entity. Only emissions due to vehicle traffic are considered in Transportation Conformity analysis.

2. Inversions trap pollutants and cause health hazards.

The impact of inversions on the air pollution levels are captured by the air quality monitors. CO emissions are dominated by cold weather conditions and the highest readings occur in winter. The last exceedance of the standard for the 8-hr CO standard was in 1985 and the 2010 reading of 1.3 ppm was far below the standard of 9 ppm. Thus, no adverse chronic conditions for CO have been detected since 1985. The forecast indicates that this situation for CO should not change.

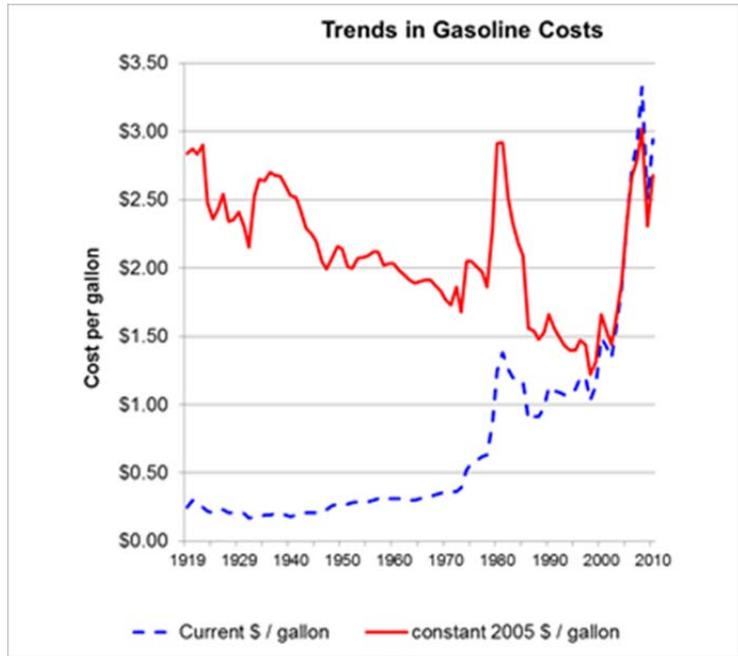
3. Assumed gas prices are too low.

Future gas prices are very difficult to forecast particularly with fluctuations experienced over the last few years. Costs must be considered relative to inflation in wages and income, and thus costs are properly compared when referenced to a particular year rather than using current year dollars.

This chart shows the trend in gasoline costs since 1919. Fuel costs in 2011 are equivalent to what they were in 1981 and even in 1922, adjusted for inflation.

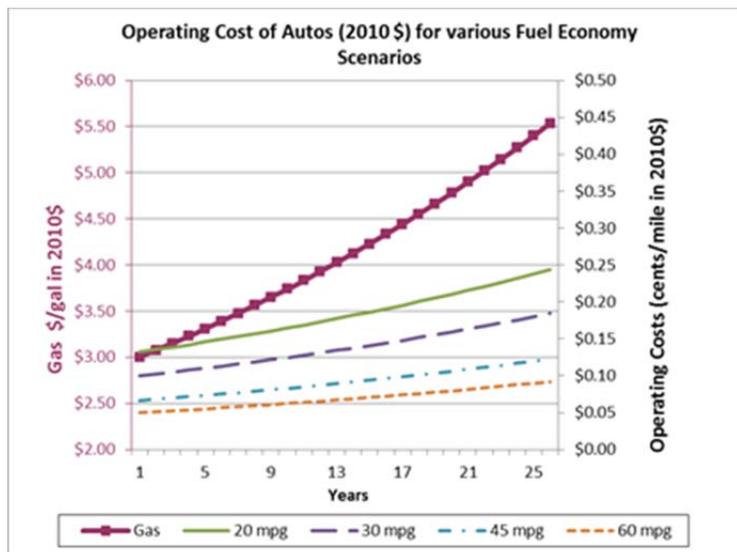
However, the costs of travel are not merely a function of gasoline prices per gallon. Increasing fuel economy offsets increasing gasoline costs. The analysis model uses cost per mile to reflect the combination of the fuel cost and the fuel economy of the fleet.

The **cost (in constant year dollars) per mile** of operating a passenger vehicle as computed by the AAA shows that the cost in 2010 was slightly less than in 2007, and was only 3.5 cents per mile more than in 2002. That is, for an average one-way trip distance of 3 miles, the cost per round trip is only 20 cents more in 2010 than in 2002.



Persistent high fuel prices are expected to result in improvements in fleet fuel economy either through user demand and/or by government regulation. CAFÉ standards and other fleet improvements such as development of EVs and hybrid vehicles result in expectations of a fleet economy of 50 mpg or even more in the 2035 time period. Further, higher gas costs are expected to result in higher consumer acceptance of smaller, more fuel efficient cars and in the purchase of alternative fuel vehicles such as EVs which use no gasoline. Thus, as fuel prices rise, a shift in the fleet composition from older, less fuel-efficient vehicles to newer, more fuel-efficient, LEVs and EVs is rationally expected.

Thus, an additional but very important factor in determining the auto **cost/mile** is the forecast of the future fleet fuel economy. This graphic illustrates the interaction of cost (adjusted for inflation) and fuel economy. A driver of an auto with 20 mpg in 2010 (year 1) would see **less cost/mile in 2035** if he then operated a vehicle with 45 mpg (assuming that gasoline increases at an average of 5% per year – the average since 2000, and wage/income inflation occurs at 2.4% per year – the average CPI since 2000).



This AQCD uses a scenario that does not assume a radical increase in the percent of trips made by modes alternative to the auto. The emissions computed are thus higher than if a large mode shift was to occur away from autos. Nevertheless, the CO budget is easily met as required.