Air Quality Conformity Determination
for
Central Lane MPO

2035 Regional Transportation Plan
and
FFY12-15 Metropolitan
Transportation Improvement Program

January 12, 2012

This report was financed in part by the Oregon Department of Transportation, the Federal Highway Administration, and the Federal Transit Administration.
Synopsis

An air quality conformity determination (AQCD) for a plan or program is a finding that the proposed transportation activities will not impede this area from continuing to meet air quality standards. The report is required in areas that have previously been determined to have violated standards for at least one of six pollutants identified by USEPA. In this area, that pollutant is carbon monoxide.

Why are we producing this document?

An AQCD is required whenever the Regional Transportation Plan (RTP) or Metropolitan Transportation Improvement Program (MTIP) is updated, or, every 4 years, whichever comes first. Thus, a conformity determination must be adopted as part of the approval process for the pending 2035 RTP and the FFY12-15 MTIP. US Department of Transportation (USDOT) must approve the conformity determination before the plans can become operative.

In 1994, the Eugene-Springfield area was redesignated by US Environmental Protection Agency (USEPA) as a maintenance area for carbon monoxide (CO). This meant that previously poor air quality had improved to the point where it now met the Clean Air Act National Ambient Air Quality Standards for CO. A 20-year maintenance period then began which ensures that no backsliding occurs and that the CO standard continues to be met. EPA had determined in 1994 that vehicle emissions were a primary source of CO levels along with home wood heating. Because of this finding, federal transportation plans and projects must be shown to not cause a violation of the CO air quality standard.

Who takes action?

The Metropolitan Policy Committee, as the policy board for the federally-designated Metropolitan Planning Organization (MPO) in the Central Lane area, must formally adopt the findings described in this report. USDOT must then confer with USEPA and if the analysis is acceptable, they will issue a positive ruling. Once the ruling is made, the plan and program become effective.

What is the basis of the analysis?

The analysis uses computer models to project the amount of carbon monoxide expected to be produced by vehicles within the MPO planning area over the period of the plan or program.

Using the regional transportation model (developed and maintained by the MPO), and the approved USEPA emissions model, the amount of CO forecast to be emitted by vehicles within the Eugene/Springfield urban area is computed at specific time intervals out to the end of the plan horizon (2035). The analysis takes into account land use patterns, population and employment numbers and spatial distribution, trips taken by other modes of transport, vehicle age and type, congested speeds, environmental conditions, etc., as well as the existing transportation network and the transportation projects that are contained within the plans under consideration.

What are the results of the Air Quality Conformity Determination?

The air quality conformity determination shows that with the implementation of the 2035 RTP and the FFY12-15 MTIP current federal air quality standards for carbon monoxide will continue to be met.

The results of the analysis favorably compare with the CO “budget” that was established by LRAPA and approved by USEPA, showing that projected CO emissions out through 2035 are such that the health standard will not be compromised by the transportation projects included in the adopted 2035 RTP and the FFY12-15 MTIP. Measured CO levels in this area back up this analysis: they have been steadily decreasing and, in 2010, reached a level of 1.3 ppm which is about 1/7 of the USEPA standard of 9 ppm—
a trend that is attributed to improvements in both car and wood stove technologies as well the implementation of this area's home wood heating advisory programs.

Other requirements of an air quality conformity determination, including interagency consultation and use of the latest planning assumptions, have also been met as described in this document. Opportunity must be provided for public comment on the AQCD. The public participation plan which guides this effort was followed as described within this document.
RESOLUTION 2012-02

ADOPTING THE AIR QUALITY CONFORMITY DETERMINATION FOR THE 2035 REGIONAL TRANSPORTATION PLAN (RTP) AND THE FFY2012-2015 TRANSPORTATION IMPROVEMENT PROGRAM (TIP)

WHEREAS, the Lane Council of Governments Board has been designated by the State of Oregon as the official Metropolitan Planning Organization (MPO) for the Central Lane region; and

WHEREAS, the LCOG Board has delegated responsibility for MPO policy functions to the Metropolitan Policy Committee (MPC), a committee of officials from Eugene, Springfield, Coburg, Lane County, Lane Transit District, and ODOT; and

WHEREAS, the Eugene/Springfield area is currently designated as a maintenance area for carbon monoxide under the Clean Air Act; and

WHEREAS, the 2035 RTP and the FFY12-15 Metropolitan TIP must demonstrate air quality conformity before both are approved by the MPO or accepted by the federal Department of Transportation, according to the requirements of OAR-340-252-0010 et. seq. and 40 CFR 93.100 et. seq.; and

WHEREAS, the Air Quality Conformity Determination is required to secure funding for transportation projects in the area;

NOW THEREFORE BE IT RESOLVED BY THE METROPOLITAN POLICY COMMITTEE OF THE CENTRAL LANE MPO:

THAT, the Air Quality Conformity Determination for the 2035 RTP and the FFY12-15 Metropolitan TIP has been prepared according to state and federal regulations and undertaken through interagency consultation with local, state and federal agencies;

THAT, the Air Quality Conformity Determination for the 2035 RTP and the FFY12-15 Metropolitan TIP has gone through a public and agency review period in accord with the requirements of the MPO's Public Participation Plan and OAR-340-252-0060, and that the comments received have been adequately addressed;

THAT, the 2035 RTP and the FFY12-15 Metropolitan TIP have been determined to conform to the requirements related to regional air quality emissions contained in OAR 340-252 (Transportation Conformity), and 40 CFR 93 (Determining Conformity of Federal Actions to State or Federal Implementation Plans); and

THAT, the Metropolitan Policy Committee hereby adopts the Air Quality Conformity Determination for the 2035 RTP and the FFY12-15 MTIP, as set forth in Exhibit A, attached to and incorporated by reference to this resolution.

ADOPTED BY THE METROPOLITAN POLICY COMMITTEE ON THIS 12th DAY OF JANUARY, 2012.

ATTEST:

George Kloeppe1
Executive Director
Lane Council of Governments

Sid Leiken, Chair
Metropolitan Policy Committee
Mr. Byron Vanderpool
Transportation Program Manager
Central Lane Metropolitan Planning Organization
859 Willamette Street, Suite 500
Eugene, OR 97401 - 2910

RE: USDOT Air Quality Conformity Determination
2012-2015 Metropolitan Transportation Improvement Program (MTIP)
2035 Regional Transportation Plan

Dear Mr. Vanderpool:

Thank you for your continued quality work in cooperation with state and local government partners and other stakeholders in the Central Lane Metropolitan Planning Area in developing transportation plans and programs that meet community needs and improve quality of life to make the area a desired place to live, work and raise families.

The Eugene-Springfield urbanized area is currently designated “maintenance” for carbon monoxide (CO) and “non-attainment” for particulate matter of less than 10 microns (PM$_{10}$). However, the U.S. Environmental Protection Agency (EPA) in their letter dated October 3, 1994 concurred with the Lane Regional Air Protection Agency (LRAPA) that the conformity determination is not required to satisfy the PM$_{10}$ criteria for regional emissions analysis. The U.S. Environmental Protection Agency (EPA) also published a Federal Register Notice approving the CO maintenance plan for the Eugene-Springfield area effective February 4, 1994.

The Clean Air Act of 1990, as amended, requires that transportation plans, programs and projects cannot create new National Ambient Air Quality Standards (NAAQS) violations, increase the frequency of severity of existing NAAQS violations or delay the attainment of NAAQS. The Metropolitan Planning Organization (MPO) and U.S. Department of Transportation (Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) are required to make a transportation conformity determination in non-attainment and maintenance areas as outlined in 40 CFR Part 93.104. Frequency of conformity determinations is outlined in 23 CFR 450, the FHWA and FTA Metropolitan Planning Rule, as well as Oregon Administrative Rule (OAR) 340-252-0050. Transportation conformity ensures that Federal funding and approval are given for those transportation activities that are consistent with air quality goals, and do not worsen air quality or interfere with the purpose of the State Implementation Plan (SIP).
FHWA and FTA have completed a review of the Central Lane Metropolitan Planning Organization (CLMPO) conformity determination for the 2012-2015 MTIP and 2035 RTP. Our USDOT determination is based upon the CLMPO conformity determination analysis and documentation submitted to our offices by CLMPO in their January 26, 2012 letter, and interagency consultation.

The CLMPO Policy Board adopted the 2012-2015 MTIP and associated air quality conformity determination on January 12, 2012, through Resolutions 2012-02. The conformity analysis provided by CLMPO indicates that air quality conformity requirements have been met. Based on our review we find that the 2012-2015 MTIP and 2035 RTP conform to the SIP in accordance with the Transportation Conformity Rule and the Oregon Conformity SIP. The Federal conformity determination was made after consultation with EPA Region 10.

This letter constitutes the joint FHWA and FTA air quality conformity determination for the CLMPO 2012-2015 MTIP and 2035 RTP. If you have any questions regarding this conformity determination, please contact Satvinder Sandhu, FHWA, at (503) 316-2560 or Ned Conroy, FTA at (206) 220-4318.

Sincerely,

Phillip A. Ditzler
FHWA Division Administrator

R. F. Krochalis
FTA Regional Administrator

cc:
EPA      (Wayne Elson, Mobile Sources)
         (Claudia Vaupel, Office of Air, Waste & Toxics, State & Tribal Air Programs Unit)
ODOT     (Lisa Nell, Region 2 Planning Manager)
         (Steve Leep, Program and Funding Services Manager)
         (Marino Orlando, Environmental Services)
LRAPA    (Sally Markos, Public Information & Education Outreach)
ODEQ     (Dave Nordberg, Transportation Planning Coordinator)
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1.0 Overview

This document is prepared by the Central Lane Metropolitan Planning Organization (MPO) to demonstrate conformity of the 2035 Regional Transportation Plan and the FFY12-15 Metropolitan Transportation Improvement Program with the State Implementation Plan as required by federal and state requirements 40 CFR 93 and OAR 340 Division 252.

Federal air quality conformity requirements are described in 40 CFR Part 93. Oregon’s Conformity SIP, adopted by the Oregon Environmental Quality Commission under OAR 340-200-0040 and approved by the US Environmental Protection Agency, establishes rules and standards for determining air quality conformity of transportation plans, programs and projects within Oregon (specifically, OAR 340 Division 252). This conformity determination meets all Federal and State conformity regulations.

1.1 Organizational Structure

Lane Council of Governments (LCOG) serves as the MPO for central Lane County, Oregon, an area that includes the Eugene-Springfield metropolitan area. The Governor of Oregon designated LCOG as the MPO for this area in 1974.

As MPO, LCOG must ensure that the transportation planning process is conducted in accordance with federal transportation planning regulations (23 CFR 450). In addition, transportation planning must be consistent with the Statewide Transportation Planning Rule (TPR, OAR 660 Division 12), the Oregon Transportation Plan, and the Lane County, Eugene-Springfield and Coburg Transportation System Plans. Further, LCOG is responsible for preparation of the long range regional transportation plan (RTP) (23 CFR 450.322) and the metropolitan transportation improvement program (MTIP) (23 CFR 450.324), and for making corresponding conformity determinations. LCOG provides technical modeling of the transportation system, prepares financial analyses and project programming, provides opportunities for public involvement, and manages the analysis and process for ensuring compliance of the RTP and MTIP with the federal (40 CFR 93) and state (OAR 340-252) requirements of the Clean Air Act.

The decision-making body of the Central Lane MPO is the Metropolitan Policy Committee (MPC) which was created by Eugene, Springfield and Lane County for ensuring cooperation on issues of metro-wide importance. When considering transportation issues, MPC is currently comprised of elected officials from Lane County and the cities of Springfield, Eugene, and Coburg. Lane Transit District (LTD) and the Oregon Department of Transportation (ODOT) are also represented.

The Transportation Planning Committee (TPC) is comprised primarily of technical staff from the public works and planning departments of local agencies. TPC advises MPC on technical transportation issues, reviews all of the transportation documents produced by LCOG, and recommends plans and actions to MPC for review and adoption. TPC is specifically designated by OAR 340-252-0060(2)(b)(A)(i) as the standing committee for purposes of consultation required under the Oregon transportation conformity rules for air quality planning.
Interagency consultation must be conducted by the MPO with Federal Highways Administration (FHWA), Federal Transit Agency (FTA), US Environmental Protection Agency (USEPA), Lane Regional Air Protection Agency (LRAPA), and Oregon Department of Transportation (ODOT).

1.2 Status of Air Pollutants

USEPA has established health-based National Ambient Air Quality Standards (NAAQS) for six air pollutants (carbon monoxide (CO), particulate matter (PM\textsubscript{10} and PM\textsubscript{2.5}), ozone (O\textsubscript{3}), sulphur dioxide (SO\textsubscript{2}), nitrogen dioxide (NO\textsubscript{2}) and lead (Pb)). Areas that fail to meet the standards are designated “non-attainment” and are required to develop plans to come into compliance with the standards. Once compliance is achieved, a maintenance plan is developed to ensure that air quality will not be compromised in the future. These plans are codified in the State Implementation Plan (SIP). The Eugene-Springfield area is currently classified as maintenance for CO and as non-attainment for particulate matter of less than 10 microns (PM\textsubscript{10}). USEPA concurred with LRAPA that transportation is a significant source for CO but not for PM\textsubscript{10} in the Eugene-Springfield area. Air quality for all other criteria pollutants meets the NAAQS and demonstration of conformity for these pollutants is not required. Thus, CO is the only criteria pollutant which must be addressed for regional transportation air quality conformity determinations.

LCOG, as the area’s MPO, was designated by the Governor in 1978 as the lead agency for air quality planning for transportation pollutants, and thus has responsibilities for CO air quality planning. Lane Regional Air Protection Agency (LRAPA) is the lead agency for air quality planning for all other pollutants, and in particular, for PM\textsubscript{10}.

Status of CO

On February 4, 1994, the Eugene-Springfield region was officially redesignated by USEPA as being in attainment of the NAAQS for CO. The region’s maintenance plan was approved by USEPA as part of the same action that approved the region’s redesignation request (see the Federal Register Notice, 58 FR 64161 in Appendix F).

There has not been a violation of the CO NAAQS in the maintenance area since 1980. In 2006, USEPA approved the removal of one of the two CO monitoring sites within the AQMA – the remaining monitor was located in downtown Eugene at 11\textsuperscript{th} and Willamette Streets (Lane Community College Downtown Center). At the end of 2010, this monitor was decommissioned and, as a result, no CO measurements will be available in the future. While monitored air quality data (Figure 1) show that CO levels are in compliance with the NAAQS and are steadily declining, demonstration of conformity relies upon compliance with the regulations in 40 CFR Part 93 and OAR Chapter 340 Division 252, to which this document responds.
Figure 1. Trends in carbon monoxide levels from 1976 through 2010 (all sources). The last violation of the National Ambient Air Quality Standards for 8-hour average CO concentration (second highest reading exceeding 9 ppm) was in 1980. The last exceedance of the standard was in 1985. CO was measured at 1.3 ppm in 2010.

**Status of PM$_{10}$**

On August 7, 1987, the Eugene-Springfield area was formally designated by USEPA as a non-attainment area for PM$_{10}$. Since 1987, the area has not recorded an exceedance of the 24-hour PM$_{10}$ standard.

The Eugene-Springfield PM$_{10}$ State Implementation Program (SIP), approved by USEPA in 1994, established that emissions from motor vehicles are not a significant contributing factor to overall PM$_{10}$ emissions and concluded that control of emissions from motor vehicles is not necessary to demonstrate attainment of the PM$_{10}$ standards. As indicated by USEPA’s letter of October 3, 1994 (see Appendix A), the Agency concurred that transportation conformity determinations for PM$_{10}$ are not required. Therefore, **no additional analysis of PM$_{10}$ is presented here.**

Note that project level conformity for PM$_{10}$ is required for projects within the Eugene-Springfield urban growth boundary, per USEPA’s October 3, 1994 letter (Appendix A). This project specific analysis is performed by the project sponsor during project development, prior to construction.
In September 2011, LRAPA Board of Directors approved a limited maintenance plan for PM$_{10}$ for submission to Oregon Environmental Quality Commission for adoption in December 2011. If approved, USEPA will be requested to formally designate the region as having achieved attainment of the PM$_{10}$ NAAQS. Redesignation by USEPA would then place the region into maintenance status for PM$_{10}$. The draft maintenance plan continues to demonstrate that transportation sources remain an insignificant component of PM$_{10}$ emissions.

1.3 Status of Transportation Plans

The Central Lane MPO 2031 RTP was adopted on November 8, 2007, and was conformed on January 16, 2008 (see approval letter in Appendix A). Since the initial adoption, one amendment has been approved: the addition of the Franklin Boulevard Multi-way Boulevard Project to the Illustrative Projects list. The need for a new air quality conformity determination was not triggered by this action since it did not change the Fiscally Constrained project list. In accord with the need to maintain a planning horizon in excess of 20 years, the 2035 RTP was prepared and was approved on December 8, 2011.

The Central Lane MPO FFY10-13 MTIP was adopted on August 12, 2010, and was conformed on November 17, 2010 (see approval letter in Appendix A). It has undergone a large number of administrative amendments since adoption, none of which has triggered the need for a new air quality conformity determination. The FFY12-15 MTIP has been prepared and is scheduled for adoption on January 12, 2012.

Currently, all three local cities within the MPO area are updating their comprehensive land use plans and their local transportation system plans (TSPs), efforts that are expected to continue into 2013. While this work continues, the 2035 RTP remains consistent with the adopted local plans.

1.4 Purpose of this Determination

The purpose of the 2035 RTP update addressed by this conformity determination is to renew the 4 year cycle of the RTP and to continue to maintain a long range planning horizon to at least 20 years. The purpose of the update of the short range FFY12-15 MTIP is to align the MTIP with the 2 year cycle for the update of the Oregon Statewide Transportation Improvement Program (STIP) and to ensure that the MTIP covers at least four years.

Conformity must be demonstrated for both the new 2035 RTP and FFY12-15 MTIP before these become the operative documents for the MPO area. This conformity determination is being carried out in order to meet this requirement.
2.0 Demonstration of Conformity for CO

The December 6, 1993, Federal Register notice of Approval and Promulgation of Redesignation (58 FR 64161, Appendix F) recognizes the nature of the CO emissions problem in the Eugene-Springfield region to be within the Central Area Transportation Study (CATS) boundary. It reads:

“...Due to the nature of Eugene’s CO violation, (i.e., hot spots only) LRAPA’s emission inventory contains only on-road mobile and home wood heating emissions within the Central Area Transportation Study boundary. All point sources within the Eugene AQMA are located at a sufficient distance away as to not contribute significantly to the violations...”

In a letter dated October 3, 1994, attached in Appendix A, USEPA approved and concurred that, for the purposes of conformity, regional emissions tests for CO apply only to projects within the CATS boundary of downtown Eugene (Maps 1 and 2). Projects outside the CATS area but within the CO Air Quality Maintenance Area (Map 1) are subject to project-level hot spot analysis for CO.

This conformity determination utilizes the regional land use/transportation model that was prepared for the 2035 RTP. This model utilizes the adopted comprehensive plans of Eugene-Springfield, Coburg and Lane County, the approved Coburg Urbanization Plan (May 2010); the coordinated populations adopted June 2009 by the coordinating body; employment based on data from Oregon Employment Department (OED) and forecasts by the OED (2008) and by Oregon Department of Administrative Services (2010); travel and congestion estimates; as required by USEPA conformity guidance. The base year of the model is 2011. The roadway network, transit service and costs are updated to reflect the current conditions, the programmed projects within the MTIP period, and the RTP fiscally constrained project list of 2035.

The CATS area was evaluated for CO emissions. The forecasts were reviewed by TPC, acting as the region’s Standing Committee on Air Quality, and also by air quality specialists from USDOT, USEPA, LRAPA and ODOT, consistent with requirements for interagency consultation.

Map 3 shows the location of Central Lane MPO projects programmed in the FFY12-15 MTIP (see Appendix B for detailed project list). Maps 4, 5 and 6 show the financially constrained projects of the 2035 RTP (see Appendix C for the project lists).

2.1 General Requirements

40 CFR 93.104: Frequency of Conformity Determinations

This conformity determination conforms the Central Lane MPO 2035 RTP and FFY12-15 MTIP.
Map 2. Central Area Transportation Study (CATS) Area

as specified in the Carbon Monoxide State Implementation Plan (CO SIP) for Eugene-Springfield.

(Note: See Map 1 for the context of this area in relation to the entire MPO area).

Area with CO Budget ("CATS")
TAZs
ROADS
Federal Functional Classification
- Urban, Rural Interstate
- Other Urban Freeways and Expressways
- Other Urban, Rural Principal Arterial
- Urban, Rural Minor Arterial
- Urban Collector, Rural Major Collector
Map 3. FFY12-15 MTIP - Programmed Capital Investment Actions

Note that not all MTIP projects have a geographic component, and are thus not represented on the MTIP map.

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<td>Thurston Road Overlay</td>
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<td>Franklin Blvd: I-5 bridge to McVay Springfield</td>
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<td>A Street Preservation and Pedestrian Enhancement</td>
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<td>Lane County Traffic Signal Upgrades</td>
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<td>Fern Ridge Path - Chambers to Arthur Streets</td>
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<td>I-5 Cable Median Barrier (Lane County)</td>
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<td>Gateway Park &amp; Ride</td>
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<td>MF Williamette Loop Path:Dorris Ranch-Clearwater Park,Unit 2A</td>
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<td>Coburg Loop Path</td>
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<td>OR126: I-5 XING-OR126B (Springfield) Development</td>
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<tr>
<td>197</td>
<td>OR126:Mohawk Blvd XING-OR126Bus Cable Barrier</td>
<td>ODOT</td>
<td>SAFETY</td>
</tr>
<tr>
<td>200</td>
<td>Main St/McVay EmX Alternative Analysis</td>
<td>LTD</td>
<td>PLANNING</td>
</tr>
</tbody>
</table>
Map 3. FFY12-15 MTIP - Programmed Capital Investment Actions

<insert Map 3>.
Map 4. 2035 RTP Financially Constrained Roadway Projects.

<insert Map 4>
Map 5. 2035 RTP Financially Constrained Bike/Pedestrian Projects.

<insert Map 5>
Map 6. 2035 RTP Financially Constrained Transit Projects.

<insert Map 6>
A new transportation plan must be found to conform before the plan is approved by the MPO or accepted by USDOT. The RTP must be conformed no less frequently than every four years. The prior RTP was last updated and conformed on 16 January 2008 (see USDOT letter included in Appendix A). The conformity determination described in this document marks the beginning of the next four year cycle for the RTP.

USDOT and the MPO must make a conformity determination on the MTIP no less frequently than every four years on a cycle that is compatible with the STIP development and approval process. The FFY10-13 MTIP was conformed on November 17, 2010 (see letters in Appendix A). The FFY12-15 STIP is scheduled for approval on January 12, 2012. Federal action to approve this conformity determination will begin the four year cycle required conformity update of the MTIP.

OAR 340-252-0060 and 40 CFR 93.105: Consultation

Federal, State, and local interagency consultation are required before making conformity determinations. MPO public involvement procedures must also be followed, as specified in 40 CFR 93.105, 40 CFR 93.112, and 23 CFR Part 450.

The Central Lane MPO is the lead agency responsible for making the conformity determination for the MTIP, performing transportation modeling, regional emissions analyses, and preparing and distributing the draft and final documents.

TPC is designated under this regulation as the Standing Committee for the purposes of consultation on air quality. Members include representatives of the local jurisdictions of Eugene, Springfield, and Lane County; Lane Transit District; Lane Regional Air Pollution Authority; Oregon Department of Transportation; and FHWA. This committee currently meets monthly. The meetings are open to the public and are advertised by emails to interested parties, web postings, and media notice. A 30-day comment period is required for review of the draft conformity determination by TPC (OAR 340-252-0600(2)(b)(G)).

The MPO must also consult with FHWA, FTA, USEPA, LRAPA and ODOT during development of the conformity determination. Further, the MPO’s public participation plan requires that the public be provided with approximately 30 days in which to comment on the air quality conformity determination; a public hearing is also required. Notice must also be sent to a maintained list of interested parties by email and a web announcement posted.

A summary of the relevant public involvement and interagency consultation dates associated with this conformity determination is provided in Table 1.

Responses to substantive written comments and verbal comments concerning this conformity determination are provided in Appendix H.
### Table 1. Summary Schedule of Public Outreach and Consultation

<table>
<thead>
<tr>
<th>Date</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>November 17, 2011</td>
<td>TPC reviews regional significance of projects for analysis</td>
</tr>
<tr>
<td>December 2, 2011</td>
<td>Draft conformity determination provided to MPC members, TPC, staff and interested parties by mail and web packet</td>
</tr>
<tr>
<td>December 2, 2011</td>
<td>Draft conformity determination document posted to MPO website for public access (<a href="http://www.TheMPO.org">http://www.TheMPO.org</a>); notice of draft document availability sent to list of interested parties by email</td>
</tr>
<tr>
<td>December 8, 2011</td>
<td>MPC holds public hearing on conformity determination and reviews draft conformity determination. MPC approves RTP 2035 contingent upon completion of demonstration of conformity</td>
</tr>
<tr>
<td>December 21, 2011</td>
<td>Interagency consultation with USEPA, USDOT, LRAPA, ODOT</td>
</tr>
<tr>
<td>December 22, 2011</td>
<td>TPC reviews conformity determination and public input, and recommends adoption.</td>
</tr>
<tr>
<td>January 9, 2012</td>
<td>Public comment period closes</td>
</tr>
<tr>
<td>January 12, 2012</td>
<td>MPC adopts FFY12-15 MTIP and AQCD conformity determination for 2035 RTP and FFY12-15 MTIP.</td>
</tr>
<tr>
<td>TBD, 2012</td>
<td>USDOT approves conformity determination of 2035 RTP and FFY12-15 MTIP.</td>
</tr>
</tbody>
</table>

As part of the ongoing development of the RTP and the MTIP, the MPO, USDOT and TPC evaluate proposed amendments to the project list to determine whether a new conformity determination would be triggered by adoption of the amendment. The public and interested parties are notified through routine postings of these materials to the web as part of the packet materials for the TPC (http://www.thempo.org/committees/tpc.cfm) and policy board meetings (http://www.lcog.org/mpc.cfm).

### 40 CFR 93.106: Content of Transportation Plans

The Eugene-Springfield area was classified as in attainment of CO air quality standards in 1994. In accord with 40 CFR 93.106(c), the MPO has elected to continue its prior practice of not specifying intermediate horizon years within the plan: the 2035 RTP contains a single horizon year of 2035, the end of the forecast period of the RTP. This conformity determination is made through 2035, the last year of the RTP’s forecast period.

Policies and planning and program actions are described within the 2035 RTP as are future highway, transit and bike/pedestrian projects. These project lists are included in this conformity determination in Appendix C. The demographic and employment factors influencing expected transportation demand, including land use forecasts and transit operating policies are quantified in this document’s response to 40 CFR 93.110, below.

The highway and transit systems are described so that intersections with existing regionally significant facilities are included in the transportation model. Project scope
and location and operating conditions are sufficient to model route options, congested travel times, and transit ridership.

Projects are either identified in the RTP or are consistent with the RTP policies, goals and objectives. In particular, the FFY12-15 MTIP is consistent with the 2035 RTP.

40 CFR 93.108: Fiscal Constraint for Transportation Plans and TIPs

Table 2 provides a summary of the FFY12-15 MTIP and the 2035 RTP financial analyses and demonstrates financial constraint. Appendices B and C provide tabular listings of all projects included in the FFY12-15 MTIP and the 2035 RTP, respectively.

Table 2: Financial Constraint Assessment
(Dollars shown are in year of expenditure for MTIP, and 2011$ for RTP)

<table>
<thead>
<tr>
<th>Description</th>
<th>RTP ($ Millions)</th>
<th>FFY12</th>
<th>FFY13</th>
<th>FFY14</th>
<th>FFY15</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Revenue</td>
<td>$1,736-$1,761</td>
<td>$119,889,720</td>
<td>$26,835,115</td>
<td>$13,250,000</td>
<td>$7,425,000</td>
<td>$167,399,835</td>
</tr>
<tr>
<td>Total Expenditures</td>
<td>$1,736</td>
<td>$119,889,720</td>
<td>$26,835,115</td>
<td>$13,250,000</td>
<td>$7,425,000</td>
<td>$167,399,835</td>
</tr>
<tr>
<td>Difference between Revenue and Expenditures</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>

Statement of Financial Constraint: Each project programmed in the FFY12-15 MTIP has an identified funding source or combination of sources reasonably expected to be available over the planning period. Funds for FFY12 and FFY13 projects are available.

2.2 Criteria and Procedures for Determining Conformity

40 CFR 93.109: General

In order to demonstrate conformity of a plan or program, specific criteria listed 40 CFR 93.110 through 93.119 must be addressed. These criteria include using the latest planning assumptions in place when the analysis began (40 CFR 93.110) and the latest emissions model (40 CFR 93.111), and undertaking interagency consultation and public involvement (40 CFR 93.112). Responses to the criteria are listed below. Since the Eugene-Springfield area has been designated by USEPA as a CO maintenance area and the CO SIP was approved by USEPA in 1994, the conformity test applied is that of the motor vehicle emissions budget test, 40 CFR 93.118.

Hot spot analyses for CO and PM10 are required of project sponsors as described in 40 CFR 93.116(a).
40 CFR 93.110: Latest Planning Assumptions

The conformity determination must be based upon the most recent planning assumptions in force at the time the conformity analysis begins. This is the time at which the modeling of the impact of the proposed plan or program on travel or emissions begins. In October 2011, the MPO completed the demand allocation and travel model for the RTP.

Key assumptions are based on current and forecasted population and employment for the 666 transportation analysis zones (TAZs) over which the transportation network is defined (Map 1). The TAZs cover the area within the urban growth boundaries of Eugene, Springfield and Coburg, and a small portion of rural Lane County. Table 3 summarizes the population and employment circa January 2011, the calibrated base year of the model, and 2035, the horizon year, the period over which the land use model was used to allocate growth. Also shown are the estimated vehicle miles traveled (VMT) for these years.

<table>
<thead>
<tr>
<th>Analysis Year</th>
<th>Population</th>
<th>Employment</th>
<th>Daily Vehicle Miles Traveled</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>MPO</td>
<td>CATS</td>
<td></td>
</tr>
<tr>
<td>2011</td>
<td>253,357</td>
<td>116,561</td>
<td>4,894,960</td>
</tr>
<tr>
<td>2035</td>
<td>316,425</td>
<td>163,290</td>
<td>6,531,310</td>
</tr>
</tbody>
</table>

1 Includes group quarters; 2 Employees covered under Unemployment Insurance; 3 All trips including commercial vehicles, through trips, external to internal, internal to external, and internal to internal trips.

Population
This conformity analysis is consistent with the coordinated population projections adopted on 17 June 2009 by the Lane County Board of Commissioners for the areas within the urban growth boundaries of Eugene/Springfield and Coburg. In adopting these forecasts, Lane County selected the Population Research Center at Portland State University to prepared population forecasts consistent with the requirements of ORS 195.036. Forecasts were developed using commonly accepted practices and standards (per OAR 660-024-0030). These projections were unchanged at the time of the analysis used in development of the 2035 RTP land use and travel model.

The projections of the population in the rural portions of the TAZs outside the urban growth boundaries were based on the existing dwelling units and the small number of vacant buildable parcels present circa January 2011 within the model TAZ area based on current METRO Plan and Lane County rural development policies. The growth analysis included a small number of residences allowed under Measure 49 based on input from Lane County planners. Growth in these rural areas is a very small component of the MPO population.
Employment
The 2011 employment numbers in the base year model are based on 2009 covered employment data (ES202/QCEW) received from the Oregon Employment Department (OED). Based on County data and unemployment reports, it was assumed that no growth occurred between October 2009 and January 2011, the base year of the model. The 2009 business addresses were geocoded to a location and sorted using specific NAICs codes into the broader categories used in the travel model. Employment projections were based on the 2021 employment forecast for the State of Oregon from Oregon Dept. of Administrative Services, the 2008-2018 county-level employment forecast from the OED, and the 1980 to 2009 trend of employment in the Eugene-Springfield market area as a proportion of the Lane County covered employment. The employment growth assumptions from the Coburg Urbanization Study of 2010 were used for the Coburg UGB. Employment by sector in the rural areas of the TAZs was assumed to increase by only 10% over the 25 year forecast period, reflecting the emphasis on natural resource and agricultural land preservation outside the UGBs.

Population and employment allocations were made to transportation analysis zones using the land use allocation model. Allocations reflect existing local development, the availability of vacant, buildable land by current plan designation, redevelopment and infill plans for mixed-use nodes and under-developed properties, and known projects currently in the planning process.

Land Use
The adopted 2015 Eugene-Springfield Metropolitan Area General Plan was used to describe future land use within the Eugene-Springfield urban growth boundary by plan designation. Metropolitan housing and employment growth was restricted to within the current Eugene-Springfield urban growth boundary. Although the densities for the new modeled residential development are higher than current averages, they are still within allowable Metro Plan densities specific to each type of residential use, and no expansion of the Eugene-Springfield UGB was assumed. The Coburg Urbanization Study, approved by the Coburg City Council in May 2010, was used to guide growth in the vicinity of Coburg with limited UGB expansion assumed for residential growth to the north and south of Coburg. Other than in the Coburg expansion area, land use plan designations in both these plans were assumed to be unchanged from the current status through 2035.

The Eugene-Springfield Metropolitan Area contains 12 mixed use centers (“nodes”) which have been adopted by the local governments. There are other areas which have been identified in the adopted Eugene-Springfield TSP (“TransPlan”) as having high potential for nodal development (Map 7). The State Transportation Planning Rule (OAR 660-012-0060(5)(a)) permits the reduction of vehicle trips by 10% in mixed use nodal areas when estimating VMT. However, this assumption was NOT made in the analysis for this conformity determination. Thus, VMT estimated here and the corresponding CO emissions are higher than those numbers that would be expected if all nodes were fully developed by 2035.

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1 Recently obtained ES202 December 2010 data from OED validates this assumption.
2 Extrapolation of the recently released 2010-2020 forecast by OED for Lane Co. is consistent with the 2035 forecast used in this analysis.
Transit
Non-auto travel is forecast by use of a mode choice model which includes walk, bike and transit modes, the latter with walk, Park and Ride, and “Kiss and Ride” access to transit. Lane Transit District operates an extensive transit system of local bus service interconnected with two ‘premium’ bus rapid transit (BRT) routes within the MPO area. The mode-choice model was recalibrated for transit ridership in 2009 following an intensive on-board survey of BRT system riders coupled with analysis of Automated Passenger Count data. As part of this recalibration a BRT mode-specific bias constant was developed.

Transit operations in 2011 were those defined in the January 2011 published schedule. Two BRT routes were operational in 2011: Franklin BRT (Eugene CBD - Springfield CBD along the Franklin Blvd corridor) and Gateway BRT (Pioneer Parkway corridor). These are included in the model according to construction details with separate guideways and intersection/signal priority. Travel times that are expressed in the model reflect on-the-ground operations of the BRT, as derived from LTD studies. Speeds, and thus travel time, are dependent on the road segment: fixed guideways provides free flow speeds; mixed traffic travel encounters congested speeds; business-access transit lanes operate at efficiencies between these two treatments. The two existing BRT routes are modeled with specific station locations, a dwell time of 18 seconds/stop, and service running at 10 minute frequencies. No special transfer conditions are assumed for BRT: the average wait time is half the combined headway services, similar to local bus. The premium mode specific constant developed as part of the 2009 calibration is used in the mode choice nest.

For 2035, 5 additional BRT projects are included in the forecast model. Map 6 depicts these routes: Main St, McVay Highway, W.11th Ave, Highway 99 and River Road. The W.11th Ave route is modeled as the Locally Preferred Alternative submitted to FTA in September 2011 for a Small Starts grant. The other four future routes are modeled so as to reflect intersection priority and route treatments that match those of the three routes (Franklin, Gateway and W.11th Ave) which are constructed or have undergone detailed site planning. Because no specific planning exists to date for the 2035 BRT projects, no station locations are asserted but rather coding allows for pick up and drop off along the route at a dwell time of 36 seconds/mile which reflects the same approximate dwell as existing stations spaced every half mile. Headways are 10 minutes on each of the BRT routes.

The 2035 project list also includes 30 miles of BusPlus – a service that improves travel time over local bus by including some features of BRT including signal priority and queue jumps, but that does not possess all of the BRT enhancements. These routes are: W. 18th Ave., Coburg Rd/Chad Drive/Harlow Rd, Centennial Blvd, and 30th Ave/LCC (see Map 6). This type of service is assumed to have signal priority but otherwise travels in mixed traffic; dwell time is assumed to be 45 seconds/mile; and headways 15 minutes. There is no differentiation from local bus in the mode choice outside of the travel time improvements that are assumed for BusPlus.
Map 7. Nodal Development Areas within the MPO, based on TransPlan

<insert Map 7>
Local buses are assumed to continue to operate in mixed traffic. Dwell time is assumed to be 60 seconds/mile; headways for most routes are generally 30 minutes; average wait time is half the combined headway services. Routes assumed in 2035 are modifications of 2011 routes, designed to interface with the BRT and BusPlus systems.

Additional Park and Ride lots are added for 2035 based on the RTP project list. In association with the 2035 BRT system, lots are assumed near the Gateway/Beltline intersection, Commerce St/W.11th Ave, Bailey Hill/W.11th Ave, Barger/Beltline Highway, and River Rd/Hunsaker Rd.

Base fares are assumed to remain constant with inflation over the period 2011 to 2035. The initial “free-fare” policy on Franklin EmX expired in 2009. LTD monthly pass prices increased in 2010 above a rate last set in 2007, but were unchanged in 2011; cash fare prices last increased from $1.25 (set in 2002) to $1.50 in 2008 and have remained at that rate through 2011.

On board survey data from 2007 were used to determine the types of fares that riders pay – cash, monthly passes, student passes, group passes. These proportions are used to weight the base fares to determine the effective average fare per trip by purpose. LTD operates a group pass program which provides reduced transit fares to employees of participating businesses. The program had experienced steady growth over past years but has suffered a substantial dip since the start of the current recession. In 2010, the program covered about 9% of all employees within the MPO compared with 20% in 2008 and about 11% in 2007. The pass program is modeled as a fare reduction for home-based work and non-home based work trips in travel zones with group pass employers; the 2007 reduction rate is assumed to remain the same through 2035. The policy in the region is to promote group pass participation and it is possible that participation rates will improve over the forecast period. This conformity analysis uses the more conservative figure of 2009.

All students from University of Oregon (UO), Lane Community College, and middle and high schools received free passes in 2005 through to 2010. However, the school student pass program which affected the middle and high school travelers was discontinued in 2011 and is assumed in this analysis to remain absent through 2035. The result is that middle and high school students utilize the monthly youth pass fare from 2011 onward. All trips originating at the University of Oregon are assumed in 2011 and 2035 to incur no cost on transit since all students, staff and faculty have access to free transit passes. These programs are included in the travel model through reductions in the fares experienced for school and college trips.

In 2011, parking costs were in place within the Eugene CBD and the University of Oregon area, and varied by TAZ. There were no parking costs in the Springfield CBD. In downtown Eugene, costs for long term permit parking have generally increased with inflation since 2007 whereas short term (2 hours) parking costs have fallen due to removal of meters in the CBD. In the UO area, however, the cost of long term unreserved permit staff/faculty parking at UO has increased at a rate of 15% per year.
over the past 5 years, while costs to students have risen at 25% per year on average since 2006. However, permit rates at UO appeared to reach a plateau in 2010, declining in 2011.

Due to changing trends in costs and until parking policies are explicitly described in the updated TSPs, it is assumed that 2035 parking costs will increase only with inflation.

According to the AAA, the average auto operating cost (fuel, tires, maintenance) is 17.74 cents per mile in 2010$, of which 12.34 cents/mile is for fuel. Inflation-adjusted data from AAA for 2002 through 2010 show that the total operating cost has varied from a low of 14.2 cents/mile to a high of 17.77 cents/mile (in terms of 2010$). While fuel costs have increased at a rate of 10.5% per year since 2005, fuel costs per mile have increased on average by 5.4% per year according to AAA, offset by increasing vehicle fuel economy. The future rate of increase in fleet fuel economy (either by more efficient consumption or by significant movement to electric powered and hybrid vehicles) versus cost of gasoline is the key to the forecast for future auto operating costs. There are many way to calculate a possible future with widely varying results. If, in fact, fuel prices rise at a rate that is not offset by increases in fuel economy, and transit costs do not increase at a faster rate (and transit service hours are maintained in the face of higher fuel prices), it is expected that auto travel will be reduced and transit ridership will increase. For this conformity analysis, the assumption is that vehicle operating costs increase at the rate of inflation. This conservative assumption will lead to an overestimate of emissions.

Under these assumptions, transit ridership is forecast to steadily increase. Transit linked trips are forecast to increase from 35,770 per average weekday (school-in-session) in 2010 to 51,623/day in 2035, an average growth rate of 1.5 % per year. Average weekday (school-in-session) boardings for 2010 were about 45,900 per day with 69,290 forecast for 2035.

Between FY03-04 and FY07-08, LTD’s schedule hours increased by 1.9% while experiencing a 39% increase in boardings. However, between FY07-08 and FY10-11, schedule hours decreased by 12% along with a decrease in boardings of 1.4%, attributed in large part to the downturn in the economy. Bus operations are primarily funded by a payroll tax within the LTD district, and the current recession forced service reductions in 2009 and 2010 due to payroll reductions. However, service has stabilized and no reductions are planned for FY2011-12. The payroll tax rate is expected to increase over the next few years, and increasing use of BRT is expected to lead to efficiencies in operations.

Meanwhile, despite the fluctuations in schedule hours, ridership productivity has increased dramatically from an average of 27 boardings per service hour in FY03-04 to 41 per hour in FY10-11. This is attributed to the initiation of the two BRT lines, increasing enrollment at Lane Community College and the University of Oregon, continuation of the student transit pass program through 2010 and higher gas prices.
Tolls
There are no road and bridge tolls in the Eugene-Springfield Metro Area and none are expected in the future.

Transportation Control Measures
No transportation control measures (TCMs) are required by the Eugene-Springfield CO SIP.

40 CFR 93.111: Latest Emissions Model

MOBILE 6.2.3 was used in the computation of CO emission factors as the MOVES model is not required until 2013 (76 FR 63560, 13 October 2011). Table 4 shows the parameter values that were used in the emissions modeling.

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Model Version</td>
<td>MOBILE 6.2.03</td>
<td>USEPA</td>
</tr>
<tr>
<td>Pollutants Reported</td>
<td>CO</td>
<td>Oregon SIP</td>
</tr>
<tr>
<td>Analysis Years</td>
<td>2011, 2020, 2030, 2035</td>
<td>USEPA regulations</td>
</tr>
<tr>
<td>Emission Month</td>
<td>January</td>
<td>LRAPA</td>
</tr>
<tr>
<td>Time Period</td>
<td>24 hours</td>
<td></td>
</tr>
<tr>
<td>Vehicle Class</td>
<td>2011 Lane County registration data</td>
<td>Oregon Dept. of Environmental Quality</td>
</tr>
<tr>
<td>Speeds – freeways, arterials</td>
<td>1 to 65 mph</td>
<td></td>
</tr>
<tr>
<td>Speeds – local roads, ramps</td>
<td>Not applicable</td>
<td>MOBILE 6 assigns single speed</td>
</tr>
<tr>
<td>Min/Max temperatures</td>
<td>33.6/46.2 deg F</td>
<td>LRAPA</td>
</tr>
<tr>
<td>Oxygenated Fuels</td>
<td>100% usage, 3.5% alcohol</td>
<td>DEQ</td>
</tr>
<tr>
<td>Fuel Reid Vapor Pressure</td>
<td>15 psi</td>
<td>LRAPA</td>
</tr>
<tr>
<td>Absolute humidity</td>
<td>26.9 grains/lb</td>
<td>LRAPA</td>
</tr>
</tbody>
</table>

LCOG staff used the above local values to run MOBILE 6 to compute air quality emissions per VMT by speed range and by facility type. These CO emission factors are listed in Appendix D-1 with sample input and output files shown in Appendices D-2 and D-3, respectively.

40 CFR 93.112: Consultation

See responses to 40 CFR 93.105.
40 CFR 93.113: Timely Implementation of TCMs

There are no TCM requirements in the CO SIP.

40 CFR 93.114: Currently conforming transportation plan and TIP

The current 2031 RTP was conformed on 16 January 2008 (see USDOT letter included in Appendix A). The current FFY10-13 MTIP was conformed on 17 November 2010 (see Appendix A). Approval of this conformity determination will establish the 2035 RTP and the FFY12-15 MTIP as the currently conforming transportation plan and TIP. All continuing capital projects from the FFY10-13 MTIP which have not yet begun construction are included in the FFY12-15 MTIP.

40 CFR 93.115: Projects from a Plan and TIP

The projects in the FFY12-15 MTIP are either included in the 2035 RTP, or are consistent with the policies and purpose of the plan and will not interfere with other projects specifically within the plan. Appendix B identifies, for each project in the MTIP, the project ID from the RTP or the consistent policy. Typically, the MTIP projects which are not explicitly listed in the RTP are pavement rehabilitation/resurfacing projects, safety projects, or exempt planning projects.

As projects of design concept and scope suitable for inclusion in the regional transportation model are amended into the RTP and/or MTIP, they are also included in the emissions modeling. The amendment approval process in place in the MPO ensures that all amendments are posted for public access, that notice is given to USDOT and other TPC members, and that this process is suitable for timely identification of whether a new or altered project can be considered to be conformed or not.

40 CFR 93.118: Motor Vehicle Emissions Budget

Since the Eugene-Springfield area has an approved CO SIP and is currently a maintenance area for CO, the motor vehicle budget test must be satisfied to demonstrate conformity. On May 5, 2004, EPA verbally and by email (see Appendix A) confirmed that the only motor vehicle budget specified in the CO SIP is that of 6,021 tons/year for 1990. No specific budget was established in the SIP for the last year of the maintenance plan.

Consistency with the emissions budget must be demonstrated for the last year of the transportation plan’s forecast period and for any intermediate years as necessary so that the demonstrations of consistency are no more than 10 years apart. Four analysis years were chosen for the conformity determination:
- 2011,
- 2020 and 2030 (intermediate years to ensure analyses are at least as frequent as 10 years),
- 2035 (the last year of the transportation plan’s forecast period)

The entire travel network was analyzed, and emissions computed for travel within the CATS area. All regionally significant projects contained in the RTP and MTIP and all other known regionally significant highway and transit projects expected in the maintenance are included in the analysis based on the current description of their scope.

The regional emissions analysis meets the requirements of 40 CFR 93.122, as described below in Section 2.3.

To demonstrate conformity, emissions must be less than or equal to the emissions budget established for the last year of the maintenance plan (no such budget exists in the Eugene-Springfield SIP), and for the years in which a motor vehicle emissions budget is established (1990). Thus, emissions for all analysis years in this conformity determination must be less than or equal to the maintenance plan’s budget of 6,021 tons/year for the CATS area.

Table 5 presents the results of the regional emissions analysis. Projected emissions are shown to be less than 6,021 tons/year, and thus the 2035 RTP and the FFY12-15 MTIP are shown to be consistent with the motor vehicle budget in the CO SIP and to meet the budget test.

Table 5: Carbon Monoxide Emissions Analysis within the CATS boundary

<table>
<thead>
<tr>
<th>Analysis Year</th>
<th>Tons/Year of Carbon Monoxide</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SIP motor vehicle budget</td>
</tr>
<tr>
<td></td>
<td>All facilities</td>
</tr>
<tr>
<td>1990</td>
<td>6,021*</td>
</tr>
<tr>
<td>2011</td>
<td></td>
</tr>
<tr>
<td>2020</td>
<td></td>
</tr>
<tr>
<td>2030</td>
<td></td>
</tr>
<tr>
<td>2035</td>
<td></td>
</tr>
</tbody>
</table>

2.3 Regional Emissions Analysis & Methodology

40 CFR 93.122: Procedures for Determining Regional Transportation-Related Emissions

VMT estimates
The transportation model is a four-step model of trip generation, trip distribution, mode choice and vehicle assignment. The traffic forecasting software package, EMME/3 (Version 3.3.4), was used to determine traffic estimates and forecasts for the entire MPO region consistent with the estimated trips within the TAZs for each analysis year. Specific data obtained from the model included speed, volumes and vehicle miles traveled as well as facility types. A link-by-link analysis was carried out. Since roadway capacity and speed are included in the model, the effects of congestion are also included.

The model base year is designated as 2011, combining land use, population and employment data, and traffic counts attributable to the period from mid-2010 to early 2011. See also previous section 40 CFR 93.110.

Transportation Networks
All regionally significant projects expected in the maintenance area were included in the regional analysis as required by the conformity test. These included all FHWA and FTA-funded capital projects proposed in the fiscally constrained transportation plan and the MTIP. The tables in Appendices B and C list the fiscally constrained projects considered in this conformity determination. Maps 3-6 show their location within the region. Criteria for projects required to be included in the regional emissions analysis were derived from 40 CFR 93.126 and 40 CFR 93.127 (Appendix E).

As a usual and continuing practice, all new facilities and all road projects that affect the capacity or speed of existing facilities are included for the appropriate year in the transportation networks developed and maintained at LCOG. Regionally significant projects outside the CATS area are thus included in this analysis. The 2011 network was comprised of the 2008 network plus road improvements completed through end-2010. The 2020 network was the 2011 network with infrastructure construction projects either completed or currently underway with completion dates no later than 2020, and all projects from the FFY12-15 MTIP which are expected to be in operation by 2020. The 2030 network is identical to the 2020 network as no intermediate horizon year is specified for the RTP and all projects within the MTIP are expected to be complete by 2020. All roadway and transit projects from the RTP that affected capacity or speed of travel were included in the fiscally constrained 2035 network.

LCOG worked with LTD to design a future year transit network for 2035 which included expansion of the BRT system as well as other conventional transit routes. It is assumed that by 2035, the two current BRT corridors continue to operate as currently implemented with a mix of separate guideways, mixed traffic running, and business access turn lanes, and priority treatment at intersections. The remaining five BRT corridors are assumed to have separate guideways for at least a portion of their routes but at this time the design is
not known and so these routes are implemented in the model through use of transit travel time functions that simulate an average mix of route treatments that have been derived from three BRT planning efforts completed for this region. Total dwell time in BRT corridors will be less than non-BRT routes due to automated fare collection, boarding through multiple doors, and limited stops. These effects influence travel demand, and are thus included through the mode choice component of the transportation system model.

Off-network roadways within the MPO area consist of local roads that are not explicitly included in the transportation network as links. Interzonal travel is included by computation of VMT on centroid connectors. Intrazonal distances used in VMT calculations are assumed to be 7/10ths of the distance to the nearest neighboring zone. All centroid connector and intrazonal travel is assumed to take place on local streets, and thus MOBILE 6 emissions factors for local streets are used in computing the emissions effects of travel on these streets. Through trips and trips having an origin or destination outside the MPO are represented within the model based on a cordon origin and destination survey and a modeled growth rate. Thus, all local and through trips that traverse the CATS area are included in the VMT and emissions summaries.

For each analysis year, travel demand was estimated and trips were distributed across the road network based on land use and transportation changes. The link speeds within the transportation network model reflect travel under congested conditions and are a function of both travel and capacity limitations of the road system for each analysis year.

**Total Emissions**
In order to compute CO emissions per link MOBILE 6 emissions factors were applied to the estimates of vehicle miles traveled (VMT) by facility type by congested speed for each analysis year. In addition to local roads explicitly included in the travel network, travel on local roads that are not represented by links in the network was also included through the application of emission factors to interzonal VMT (through centroid connectors), and intrazonal VMT (see “Transportation networks” above). CO emissions on the facilities within the CATS area were then totaled to estimate the CATS area-wide CO emissions in tons/year for each analysis year. The results are listed in Table 5.

Note that since emission factors pertaining to “winter” (January) conditions are applied to VMT over the entire year and the lower emission factors of the summer season are not used, the computed yearly CO load is a conservative estimate.

**Credits**
No emissions reduction credits are included in the analysis.

**Ambient temperatures**
The ambient temperatures used for the regional emissions analysis are consistent with those used to establish the emissions budget in the CO SIP.
40 CFR 93.126: Exempt Projects

Certain air quality projects within the financially constrained plan are exempt from the requirement that a conformity determination be made (see 40 CFR 93.126 Tables 2 and 3, Appendix E). These projects are defined by USEPA as projects which will not affect the outcome of any area-wide air quality analysis. Although these projects are exempt from emissions analysis, the Central Lane MPO system-wide traffic-forecasting model reflects all capital investment projects, including those designated as exempt, to the extent possible (e.g. in approach capacities and link speeds) in the assignment of traffic and calculation of VMT.

Projects designated as exempt from the requirement to determine conformity included planning and technical studies including bike facilities; pedestrian facilities, construction of passenger shelters, purchase of operating equipment, and planning projects which do not lead directly to construction. Prior interagency consultation clarified that urban standards projects are also exempt based on the implementation of safety improvements, widening narrow pavements (no additional travel lanes), pavement rehabilitation, and landscaping.

The lists of projects in Appendices B and C were reviewed during interagency consultation. Exempt projects are annotated as to the reason for this classification.

40 CFR 93.127: Projects Exempt from Regional Emissions Analyses

While certain highway and transit projects are exempt from regional emissions analysis requirements (Appendix E), it is LCOG-practice that the system-wide traffic-forecasting model reflect these projects to the extent possible (e.g. in approach capacities and link speeds) in the assignment of traffic and calculation of VMT.

The lists of projects in Appendices B and C were reviewed during interagency consultation. Exempt projects are annotated as to the reason for this classification.

40 CFR 93.128: Traffic Signal Synchronization Projects

The status of all completed projects has been included in the emissions analysis: signal progressions have been taken into consideration by developing intersection approach capacities on the links. Regionally significant signal synchronization projects operating on a 24 hour basis are located on:

- 6th Avenue/7th Avenue couplet
- Oak St (between 19th and 7th Avenues)
- Main/South A St couplet
3.0 Summary

As shown above in response to 40 CFR 93.118, the 2035 RTP and the FFY12-15 MTIP are shown to be consistent with the motor vehicle budget in the CO SIP and to meet the budget test.

As shown in Figure 1, CO levels in the maintenance area have continued to decline since 1990. In 2010, the CO design value for the AQMA fell to 1.6 ppm, and the yearly measurement was 1.3 ppm. The observed trends in the data and the consistent modeled results thus engender confidence that the policies and projects in the RTP and MTIP will not endanger the achievement of the NAAQS for CO in the Eugene-Springfield maintenance area.

All requirements for making an air quality conformity determination have been successfully met, as documented within this report.