

APPENDIX E: 2017 TRANSPORTATION CONFORMITY

* Revised as of 7/5/2017

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Transportation Conformity

Transportation conformity ("conformity") is a way to ensure that Federal funding and approval goes to those transportation activities that are consistent with air quality goals. Conformity applies to transportation plans, transportation improvement programs (TIPs), and projects funded or approved by the Federal Highway Administration (FHWA). The transportation conformity rule appears in 40 CFR Parts 51 and 93 and requires all jurisdictions in non-attainment areas or who are under federally approved maintenance plans to submit a conformity analysis if the planning or programming documents identify projects that have been defined as non-exempt. The CAAA also directs MPOs to facilitate the expeditious implementation of the Transportation Control Measures (TCMs) that are included in the SIP. No TCMs are applicable to the Tahoe Region therefore no control measures are identified for implementation.

Conformity Interagency Consultation Procedures

Transportation conformity requires an interagency consultation process to cooperatively develop and provide feedback on the analytical assumptions, methodology, and approach. The interagency consultation for the 2017 Regional Transportation Plan conformity analysis included a request to review associated modeling and analytical assumptions dated September 19, 2016. The request was sent to the California Department of Transportation (Caltrans), Nevada Department of Transportation (NDOT), Federal Highway Administration (FHWA), Federal Transit Administration (FTA), California Air Resources Board (CARB), Nevada Department of Environmental Protection (NDEP) and Environmental Protection Agency (EPA) before concluding conformity findings. Air quality planning in this area is the joint responsibility of TMPO, El Dorado Air Pollution Control District (EDAPCD), Placer County Air Pollution Control District, Nevada Division of Environmental Protection, Washoe County District of Health, and the Tahoe Regional Planning Agency (TRPA). TMPO/TRPA circulated the methodology and analysis used to confirm air quality conformity to the above entities for an opportunity to comment. No outstanding issues were identified and TRPA/TMPO followed the methodology outlined in the request memo referenced above.

Air Quality Modeling and Analytical Assumptions

Pursuant to the conformity regulation, a regional emissions analysis which incorporates all conformity non-exempt projects must meet the emissions budget test before the 2017 Regional Transportation Plan can be determined to conform to the State Implementation Plan. This analysis is holistic in scope, with final conformity based on the program rather than on a project-by-project basis. This emissions test is required for Carbon Monoxide (CO). This analysis pertains solely to California Clean Air Amendments conformity mandates and should not be construed as environmental impact findings related to the National Environmental Policy Act or California Environmental Quality Act environmental review processes.

A conformity analysis must include the attainment milestone year of the SIP, the forecast horizon year of the applicable RTP and have no analysis gaps greater than ten years. Based on these requirements, the conformity analysis years selected for this analysis are: 2010, 2020, 2035 and 2040.

Nevada's conformity analysis differs from California's in that there is no emissions budget to conduct a conformity analysis. Carson City, Washoe, and Douglas County are currently working under Limited Maintenance Plans for Carbon Monoxide. The Nevada Department of Environmental Protection (NDEP); Carbon Monoxide Re-designation Request and Limited Maintenance Plan was approved by the EPA in February 2004.)

In March 2012, NDEP drafted a revision to the Nevada SIP titled "2012 Revision to the Nevada State Implementation Plan for Carbon Monoxide; Updated Maintenance Plan for the Nevada side of the Lake Tahoe Basin, NDEP 2012." Under the Conformity Rule, EPA guidance asserts that in a limited maintenance plan areas, emissions budgets may be treated as not constraining because the area is unlikely to grow enough that a violation of the NAAQS would occur and that emissions need not be capped for the maintenance period.

Conformity Results

For the California portion of the Lake Tahoe Air Basin (LTAB), the applicable federal air quality maintenance plan for Lake Tahoe is the Carbon Monoxide Maintenance Plan originally adopted in 1996 and revised in 2004¹. Part of the maintenance strategy involves allocation of transportation emissions budgets to the maintenance areas as approved by the EPA (Federal Register / Vol. 70 No 229 November 30, 2005). The motor vehicle emissions budgets for the Lake Tahoe Maintenance Areas are summarized in Table E.1.

Table E.1: Motor Vehicle Emission Budgets

Carbon Monoxide Maintenance Area Emissions Budgets		
CO Maintenance Area	2010	2018
Lake Tahoe North Shore (Eastern Placer County)	11	11
Lake Tahoe South Shore (Eastern El Dorado County)	19	10
Notes: CO = carbon monoxide; TPD = tons per day. Source: TMPO 2016:2.		

An analysis of conformity of the 2017 Regional Transportation Plan with the regional air quality plan for CO was conducted for the RTP/SCS IS/IEC. An absolute vehicle miles travelled (VMT) in the respective California portions of the Region (Placer and El Dorado Counties) was obtained from the TRPA travel demand model. VMT was interpolated to derive activity data for attainment milestone years 2018 and 2026. Daily CO emissions associated with VMT were modeled using EMFAC 2014 and compared with the applicable emissions budget for the respective portions of the Region (i.e., Placer and El Dorado Counties). The results of the analysis can be found in

Table E.2.

Table E.2: CO Conformity Mobile Source Emission Modeling Results

CO Conformity Mobile Source Emissions Modeling Results		
2016 RTP (Post-TRIA)	El Dorado County	Placer County
Vehicle Activity Data	VMT	VMT

¹ Nevada Department of Environmental Protection, 2004

2005	569,892		471,998	
2010 (interpolated)	572,808		468,118	
2018 (interpolated)	577,472		461,911	
2020	578,638		460,360	
2026 (interpolated)	593,898		479,957	
2035	631,510		518,091	
2040	629,505		525,686	
	El Dorado County		Placer County	
EMFAC 2014 Outputs	Total CO (TPD)	Emissions Budget	Total CO (TPD)	Emissions Budget
2010		19		11
2018	1.36	10	0.99	11
2026	0.63	-	0.47	-
2035	0.41	-	0.31	-
Note: Assumes 2005 TRPA speed bin for 2010, and 2020 TRPA Speed Bins for 2018 and 2026. Assumes speed bins do not differ by vehicle class. VMT by vehicle class and speed bin was not available from TRPA. VMT Split between counties is based on EMFAC2014's default VMT mix multiplied by the total VMT.				

Conformity Determination

Based on the conducted analysis, and the results shown above the LTAB (California and Nevada) is well below designated Carbon Monoxide budgets, therefore a **determination of conformity is recommended**.