

**2012-2035 Regional Transportation Plan/Sustainable Communities Strategy
and 2015 Federal Transportation Improvement Program
Conformity Re-determination for 2012 Annual Fine Particulate Matter
(PM_{2.5}) National Ambient Air Quality Standard**

Draft Report

Southern California Association of Governments

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I. Introduction

Transportation conformity is required under the federal Clean Air Act (CAA) to ensure that federally supported highway and transit project activities conform to the purpose of the State Implementation Plan (SIP). Conformity to the purpose of the SIP means that transportation activities will not cause new air quality violations, worsen existing violations, or delay timely attainment of the relevant National Ambient Air Quality Standard (NAAQS). Conformity applies to nonattainment and maintenance areas for the following transportation-related criteria pollutants: ozone, particulate matter (PM_{2.5} and PM₁₀), carbon monoxide (CO), and nitrogen dioxide (NO₂).

The U.S. Environmental Protection Agency (EPA) promulgated the new annual PM_{2.5} NAAQS on January 15, 2013 [Federal Register (FR)/Vol. 78, No. 10]. Effective on March 18, 2013, the EPA action tightened the primary/health-based annual PM_{2.5} standard to be 12.0 micrograms per cubic meter (µg/m³) while retained the primary 24-hour PM_{2.5} standard (35 µg/m³) and the secondary/welfare-based annual (15 µg/m³) and 24-hour (35 µg/m³) standards.

Subsequently, EPA published a final rule in the Federal Register on January 15, 2015 establishing initial air quality designations for most areas in the United States including California for the 2012 PM_{2.5} standard (FR/Vol. 80, No. 10).

In the SCAG region, two areas were designated as nonattainment areas for the new 2012 PM_{2.5} standard with the same “Moderate” classification and the same attainment date of December 31, 2021: the urbanize area of Imperial County and the whole South Coast Air Basin.

These new area designations became effective April 15, 2015. As a result, conformity needs to be re-determined for the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and 2015 Federal Transportation Improvement Program (FTIP) for the new PM_{2.5} standard by April 15, 2016.

Under the U.S. Department of Transportation (DOT) Metropolitan Planning Regulations and U.S. EPA’s Transportation Conformity Regulations, an RTP/FTIP conformity determination consists of five tests: consistency with the adopted RTP; regional emissions analysis; timely implementation of transportation control measures (TCMs); financial constraint; and interagency consultation and public involvement.

The draft PM_{2.5} conformity re-determination reaffirms all applicable conformity findings for the 2012-2035 RTP/SCS and the 2015 FTIP and addresses additional emissions analyses and interagency consultation and public involvement required for the new annual PM_{2.5} standard.

Conformity Status of the Currently Conforming RTP/SCS and FTIP

The effective date of the final conformity determination for the adopted 2012-2035 RTP/SCS, covering all nonattainment and maintenance areas in the SCAG region, is June 4, 2012. The 2012-2035 RTP/SCS Amendment No. 2 and the 2015 FTIP received federal approval on December 15, 2014. The conformity determination is currently effective for four years from the final conformity

determination for the adopted 2012-2035 RTP/SCS; thus the 2012-2035 RTP/SCS and 2015 FTIP conformity will remain effective until June 4, 2016.

The new PM_{2.5} conformity re-determination does not affect the existing conformity schedule for the RTP/SCS or FTIP. However, the new federal conformity regulation for PM_{2.5} requires SCAG to make a positive conformity re-determination and receive approval from the U.S. DOT by April 15, 2016.

Process for PM_{2.5} Conformity Re-determination on the 2012-2035 RTP/SCS and the 2015 FTIP

1. Conduct interagency consultation through SCAG's Transportation Conformity Working Group (TCWG) which includes representatives from the respective air quality and transportation planning agencies.
2. Perform regional emissions analysis for the new PM_{2.5} standard. There are existing PM_{2.5} emission budgets in the South Coast Air Basin PM_{2.5} nonattainment area, thus a budget test has been performed for the area. Since there are no PM_{2.5} emission budgets in the Imperial County PM_{2.5} nonattainment area, an interim build/no-build test has been performed.
3. Reaffirm the existing conformity findings for the 2012-2035 RTP/SCS and the 2015 FTIP.
4. Release the draft conformity analysis and documentation for the new PM_{2.5} standard for a 15-day public review and public comment period.
5. SCAG's Energy and Environment Committee approves the conformity re-determination and recommends adoption by SCAG Regional Council.
6. SCAG's Regional Council adopts the resolution making the final conformity re-determination.
7. Submit SCAG's Conformity Re-determination to federal agencies for approval.
8. Approval by the federal agencies by April 15, 2016.

Reaffirming Approved Conformity Findings for CO, NO₂, Ozone, and PM₁₀

The PM_{2.5} conformity re-determination includes a re-affirmation of the approved conformity findings for both the 2012-2035 RTP/SCS and the 2015 FTIP as previously amended. This re-affirmation includes consistency with the adopted 2012-2035 RTP/SCS, regional emissions analyses, financial constraint test, timely implementation of TCMs, and interagency consultation and public participation.

II. PM_{2.5} Emissions Analysis

Tables 1-2 below and on the next page present the results of the PM_{2.5} emissions analysis for the two nonattainment areas under the new 2012 annual PM_{2.5} standard. Note that the values of total emissions from the 2012-2035 RTP/SCS and 2015 FTIP as previously amended in the tables below utilize the rounding convention used by the California Air Resources Board to set the budgets (i.e., any fraction rounded up to the nearest ton) and are the basis of the conformity findings for these areas.

Table 1. Urbanized Portion of Imperial County 2012 PM_{2.5} (Annual [Tons/Day])¹

Pollutant		2020	2030	2035
NOX	No-Build	3.2	3.0	3.2
	FTIP Build	3.1	2.9	3.1
No Build – Build		0.1	0.1	0.1
PM _{2.5} No-Build	Re-entrained Road Dust	0.1	0.1	0.1
	Motor Vehicle	0.1	0.2	0.2
	Total Emissions	0.2	0.3	0.3
PM _{2.5} Build	Re-entrained Road Dust	0.1	0.1	0.1
	Motor Vehicle	0.1	0.2	0.2
	Total Emissions	0.2	0.3	0.3
No Build – Build		0.0	0.0	0.0

¹ The attainment year 2021 is not a required analysis year under the interim test per U.S. EPA's Transportation Conformity Regulations §93.119(g)

Table 2. South Coast Air Basin 2012 PM_{2.5} (Annual Emissions [Tons/Day])

Pollutant		2021	2030	2035
ROG	2015 FTIP	81.8	67.3	60.1
Total Emissions		82	68	61
Emission Budget		132	132	132
Budget – Emissions		50	64	71
NOX	2015 FTIP	161.1	120.5	114.8
Total Emissions		162	121	115
Emission Budget		290	290	290
Budget – Emissions		128	169	175
PM _{2.5}	2015 FTIP	11.4	12.4	12.6
Re-entrained Road Dust Paved		7.8	8.6	8.7
Re-entrained Road Dust Unpaved *		0.6	0.6	0.6
Road Construction Dust *		0.5	0.4	0.4
NO _x to PM _{2.5} Trading		-7.8	-10.2	-10.6
Sum		12.4	11.8	11.7
Total Emissions**		13	12	12
Emission Budget		35	35	35
Budget – Emissions		22	23	23

* The detailed PM_{2.5} emission budgets were provided by ARB on March 8, 2012.

** The Plan PM_{2.5} emissions for years after 2014 are calculated with the NO_x to PM_{2.5} (10 to 1) trading mechanism as approved by EPA on November 9, 2011.

III. Conformity Re-Determination

SCAG has determined the following conformity findings for the 2012-2035 RTP/SCS and the 2015 FTIP as previously amended under the required federal tests for the new PM_{2.5} standard:

Regional Emissions Tests

- Finding: The regional emissions for PM_{2.5} and its precursors from the 2012-2035 RTP/SCS and the 2015 FTIP meet the interim test for all milestone and planning horizon years for the urbanized area of the Imperial County under the 2012 PM_{2.5} NAAQS.
- Finding: The regional emissions for PM_{2.5} and its precursors from the 2012-2035 RTP/SCS and the 2015 FTIP meet all applicable emission budget tests for all milestone, attainment, and planning horizon years for the South Coast Air Basin under the 2012 PM_{2.5} NAAQS.

Re-affirmation of the 2012-2035 RTP/SCS and 2015 FTIP Conformity Tests

- Finding: SCAG reaffirms the applicable conformity findings for both the 2012-2035 RTP/SCS (<http://rtpscs.scag.ca.gov/Documents/2012/famendment/2012A02RTPSCS.pdf>) and the 2015 FTIP (http://ftip.scag.ca.gov/Documents/Final2015FTIP_TA_Sec01.pdf).
- This reaffirmation covers the findings of all applicable pollutants, including consistency with the adopted 2012-2035 RTP/SCS, regional emissions analyses, financial constraint test, timely implementation of TCMs, and interagency consultation and public participation.

Inter-agency Consultation and Public Involvement Test

- Finding: In addition to reaffirming the public involvement and interagency consultation test for the 2012-2035 RTP/SCS and the 2015 FTIP, the annual PM_{2.5} conformity re-determination will undergo an appropriate process for interagency consultation and public participation. This process includes TCWG consultation on November 17, 2015 and a subsequent 15-day public review period. After the public review period closes, the final conformity re-determination report is scheduled to be considered for approval by SCAG's Energy and Environment Committee and Regional Council in February 2016.