

## ATTACHMENT A

### CONSULTATION ON A CONFORMITY ANALYSIS FOR AN AMENDMENT TO THE FY 2016-2025 SUN CORRIDOR METROPOLITAN PLANNING ORGANIZATION TRANSPORTATION IMPROVEMENT PROGRAM AND REGIONAL TRANSPORTATION PLAN 2040

The Sun Corridor Metropolitan Planning Organization is conducting consultation on a conformity analysis for an Amendment to the FY 2016-2025 Sun Corridor MPO Transportation Improvement Program (TIP) and Sun Corridor MPO Regional Transportation Plan 2040 (RTP). The conformity analysis indicates that the Amendment to the TIP and RTP satisfies the criteria specified in the federal transportation conformity rule for a conformity determination. A finding of conformity is therefore supported.

The federal conformity regulations at 40 CFR Parts 51 and 93 specify the criteria and procedures for conformity determinations for transportation plans, programs, and projects and their respective amendments. Under the federal transportation conformity rule, the principal criteria for a determination of conformity for transportation plans and programs are: (1) the TIP and Regional Transportation Plan must pass an emissions budget test with a budget that has been found to be adequate or approved by the U.S. Environmental Protection Agency (EPA) for transportation conformity purposes, or an interim emissions test; (2) the latest planning assumptions and emissions models specified for use in air quality implementation plans must be employed; (3) the TIP and Regional Transportation Plan must provide for the timely implementation of transportation control measures (TCMs) specified in the applicable air quality implementation plans; and (4) consultation.

The latest conformity determination for the FY 2016-2025 Sun Corridor MPO Transportation Improvement Program and Sun Corridor MPO Regional Transportation Plan 2040 for the Pinal County PM-10 and PM-2.5 nonattainment areas was made by the Federal Highway Administration and Federal Transit Administration on July 11, 2017. The results of the regional emissions analysis for the Pinal County PM-10 and PM-2.5 nonattainment areas are described below and in Table I.

#### Pinal County Nonattainment Areas Regional Emissions Analysis

For the Pinal County PM-10 and PM-2.5 nonattainment areas, there are no adequate or approved motor vehicle emissions budgets for conformity. Therefore, the conformity interim emissions tests were applied. In January 2017, EPA indicated they will not find to be adequate or approve the 2018 emissions budget in the 2015 West Pinal Moderate PM-10 Nonattainment Area SIP prepared by Arizona Department of Environmental Quality (ADEQ) and submitted to EPA in December 2015. Therefore, the 2018 PM-10 budget in that SIP is not included.

In selecting analysis years for the interim emissions tests, the transportation conformity rule indicates that the years must be no more than ten years apart, the first year must be no more than five years beyond the year in which the conformity determination is being made, and the last year must be aligned with the transportation plan. The analysis year 2018 is modeled since it meets the requirement that the first year must be no more than five years beyond the year in which the conformity determination is being made. The analysis years 2025 and 2035 are intermediate years that meet the federal conformity requirement that analysis years be no more than ten years apart. The analysis year 2040 is the last horizon year for both the Sun Corridor MPO Regional Transportation Plan 2040 and the 2040 MAG Regional Transportation Plan. Therefore, the action and baseline tests were

conducted for PM-10 for the West Pinal PM-10 Nonattainment Area and for PM-2.5 and NOx for the West Central Pinal PM-2.5 Nonattainment Area for the analysis years of 2018, 2025, 2035 and 2040. For each test, the required emissions estimates were developed using the transportation and emission modeling approaches required under the federal transportation conformity rule.

The Maricopa Association of Governments and the Sun Corridor Metropolitan Planning Organization have coordinated on the inputs to the transportation model and on consultation on the conformity analysis. Both the MAG Metropolitan Planning Area Boundary and the Sun Corridor Metropolitan Planning Area Boundary include portions of the West Pinal PM-10 Nonattainment Area and West Central Pinal PM-2.5 Nonattainment Area. Both nonattainment areas are covered by the boundaries of the two metropolitan planning organizations. Since MAG is also preparing an amendment to the FY 2018-2022 MAG Transportation Improvement Program and 2040 MAG Regional Transportation Plan, transportation conformity is required to be demonstrated for both nonattainment areas by both metropolitan planning organizations.

For PM-10, the projected emissions for the action scenario are not greater than the projected emissions for the baseline scenario for each of the years analyzed: 2018, 2025, 2035, and 2040. Since the PM-10 emissions projected for the action scenarios are not greater than the PM-10 emissions projected for the baseline scenarios, the conformity interim emission test is satisfied. It is also reasonable to expect the action emissions would not exceed the baseline emissions for the time periods between the analysis years.

For PM-2.5, the projected emissions for the action scenario are not greater than the projected emissions for the baseline scenario for each of the years analyzed: 2018, 2025, 2035, and 2040. Since the PM-2.5 emissions projected for the action scenarios are not greater than the PM-2.5 emissions projected for the baseline scenarios, the conformity interim emission test is satisfied. It is also reasonable to expect the action emissions would not exceed the baseline emissions for the time periods between the analysis years.

For NOx, the projected emissions for the action scenario are not greater than the projected emissions for the baseline scenario for each of the years analyzed: 2018, 2025, 2035, and 2040. Since the NOx emissions projected for the action scenarios are not greater than the NOx emissions projected for the baseline scenarios, the conformity interim emission test is satisfied. It is also reasonable to expect the action emissions would not exceed the baseline emissions for the time periods between the analysis years.

#### Latest Planning Assumptions and Emissions Models

In accordance with federal conformity requirements, the latest planning assumptions and emissions models specified for use in air quality implementation plans were employed for this conformity determination. The latest planning assumptions used for this conformity determination are consistent with the 2017 MAG Conformity Analysis for the FY 2018-2022 Transportation Improvement Program and the 2040 Regional Transportation Plan and the Sun Corridor Metropolitan Planning Organization 2017 Conformity Analysis, except that the most recent available vehicle registration data was used in this conformity analysis. July 2017 vehicle registration data was obtained from the Arizona Department of Transportation (ADOT) for both Maricopa County and Pinal County.

All analyses were conducted using the latest planning assumptions and emissions models in force at the time the conformity analysis began on July 11, 2017. A summary of the latest planning assumptions, including population, employment, and vehicle registrations data used in the regional emissions analysis, is provided in Table 2.

#### Timely Implementation of Transportation Control Measures

A status report on Transportation Control Measures (TCMs) is not required since there are no applicable plans

for the West Pinal PM-10 Nonattainment Area and West Central Pinal PM-2.5 Nonattainment Area that contain TCMs. The 2015 West Pinal Moderate PM-10 Nonattainment Area State Implementation Plan (SIP) prepared by ADEQ was submitted to EPA on December 21, 2015. Also, on May 1, 2017, EPA approved SIP revisions that concern particulate matter emissions from construction sites, agricultural activity, and other fugitive dust sources, effective May 31, 2017.

#### Consultation

In accordance with federal and state rules, the Sun Corridor MPO is required to provide reasonable opportunity for consultation with state air and transportation agencies, local agencies, U.S. Department of Transportation, Environmental Protection Agency, and other interested parties. A 30-day consultation period is being provided on the conformity analysis and the Amendment to the FY 2016-2025 Sun Corridor MPO Transportation Improvement Program and Sun Corridor MPO Regional Transportation Plan 2040. Consultation is concluded by notifying the agencies and other interested parties of any approval action taken by the Sun Corridor MPO Executive Board and any comments received during the period of consultation.

TABLE I.  
 CONFORMITY INTERIM EMISSION (ACTION/BASELINE) TEST RESULTS  
 (KILOGRAMS/DAY)  
 PINAL COUNTY PM NONATTAINMENT AREAS

	PM-10 Nonattainment Area	PM-2.5 Nonattainment Area	
Pollutant	PM-10	PM-2.5	NOx
2018			
- Action	110,712	30	1,224
- Baseline	111,587	30	1,224
2025			
- Action	117,684	22	886
- Baseline	119,603	26	1,179
2035			
- Action	130,580	20	808
- Baseline	132,801	24	1,154
2040			
- Action	138,098	23	937
- Baseline	140,264	27	1,443

**TABLE 2. LATEST PLANNING ASSUMPTIONS FOR CONFORMITY DETERMINATIONS  
FOR THE MAG TRANSPORTATION MODELING DOMAIN COVERING MARICOPA AND PINAL COUNTIES**

<u>Assumption</u>	<u>Source</u>	<u>MAG Models</u>	<u>Next Scheduled Update</u>
Population and Employment	Under the Governor's Executive Order 2011-04, official County projections are updated every 3 to 4 years. These official projections are used by all agencies for planning purposes. The Arizona Department of Administration (ADOA) prepared a new set of Maricopa County projections based on the 2010-2014 American Community Survey in December 2015. MAG developed a set of subcounty population and employment projections for Maricopa County that are consistent with the ADOA population projections. The MAG Regional Council approved the subcounty socioeconomic projections in June 2016. In addition, Central Arizona Governments (CAG) approved the Pinal County subcounty socioeconomic projections, based on the ADOA Pinal County projections, in June 2016. The MAG Traffic Analysis Zone System was updated and expanded to reflect the latest socioeconomic changes in 2016.	AZ-SMART (UrbanSim/OPUS)	Under the Governor's Executive Order 2011-04, official county socioeconomic projections will be developed by the Arizona Department of Administration. It is anticipated that ADOA will complete the county level projections in 2018 and MAG will prepare subcounty socioeconomic projections for approval by the MAG Regional Council within six months after receipt of the ADOA county level projections.
Traffic Counts	The highway models were validated in 2016 for the 2015 base year, using approximately 3,000 traffic counts collected by MAG in 2014-2015.	TransCAD	Region-wide traffic counts are typically collected by MAG every 2-4 years, if funds are available.
Vehicle Miles of Travel	The passenger travel demand models were calibrated in 2012-2013 using data from the 2008-2009 home interview survey, 2009 Transearch data, 2010-2011 regional transit on-board survey, 2011 Truck GPS data, and 2012 Airport and ASU surveys. The recalibration effort included a complete update of the regional travel demand model based on the relevant data sets listed above. Trip generation and trip distribution were recalibrated based on the 2008-2009 National Household Travel Survey Arizona Add-On sample and 2006-2009 American Community Survey and Public Use Microdata Sample data sets. Mode choice was recalibrated based on the 2010 on-board survey. The truck model was recalibrated based on the new 2009 Transearch data and 2011 Truck GPS data from ATRI. Special generator sub-models were recalibrated based on 2012 regional airports and ASU travel surveys. The external travel model was recalibrated in 2011 based on the 2008 external travel study. Volume-delay functions were recalibrated in 2012-2013 based on the 2011 commercial speed data. Incremental updates and improvements were introduced to the model to reflect network changes, socioeconomic forecast changes, and changes in the traffic zone system. The model was comprehensively revalidated in 2015-2016 using 2014-2015 traffic counts and speed data. The overall calibration year for the model is 2011 and the latest base year based on a comprehensive validation is 2015.	TransCAD	MAG has completed a major update, development and recalibration of the regional transportation model in FY 2013. The FY 2014 Unified Planning Work Program (UPWP) included funding for the initiation of the next series of travel surveys in calendar years 2014-2016. These surveys are currently ongoing. The data from the surveys will form a foundation for the next round of model development and updates. Various commercial data sources have been used to maintain and incrementally update the models in between the major recalibration updates. The model is currently being recalibrated using the 2015 Transit On-board Survey and 2014-2016 truck and speed data. The main travel surveys and related data analysis and processing are expected to be completed in FY 2018.
Speeds	The highway models were validated using 50 million traffic speed records purchased from HERE for calendar year 2014 and also compared to a similar data set purchased in 2015.	TransCAD	Travel speed data are purchased periodically to validate the transportation models. MAG also utilizes commercial speed data for future estimation and model calibration purposes.
Vehicle Registrations	July 2017 vehicle registrations were provided by ADOT.	MOVES2014a	When newer data become available from ADOT.
Implementation Measures	Latest implementation status of commitments in prior SIPs.	N/A	Updated for every conformity analysis.

ATTACHMENT B