BEFORE THE METRO COUNCIL

RESOLUTION NO. 00-2978 FOR THE PURPOSE OF ADOPTING THE PORTLAND AREA AIR QUALITY CONFORMITY DETERMINATION FOR AMENDMENT OF THE 1995 REGIONAL TRANSPORTATION PLAN (RESOLUTION NO. 00-2972B) AND THE FY 2000 METROPOLITAN TRANSPORTATION IMPROVEMENT PROGRAM (RESOLUTION NO. 00-2950) TO INCLUDE THE WILSONVILLE/ BEAVERTON COMMUTER RAIL PROJECT (REFERENCE RESOLUTION 00-2969B)	)	RESOLUTION NO. 00-2978 Introduced by Councilor Jon Kvistad, JPACT Chair

WHEREAS, State and federal regulation require that no transportation project may interfere with attainment or maintenance of air quality standards; and

WHEREAS, The proposed Wilsonville/Beaverton Commuter Rail project in Washington County is considered in the State Conformity Rule to be a regionally significant project with respect to its potential effects on regional air quality; and

WHEREAS, funds appropriated by Congress to support 30 percent design for the project have been authorized for obligation in the FY 2000 through 2003 Metropolitan Transportation Improvement Program (Metro Resolution No. 00-2950, approved); and

WHEREAS, The project scope and concept are being amended into the 1995 Regional Transportation Plan (Metro Resolution No. 00-2972B, pending); and

WHEREAS, The project has also been included in the Financially Constrained Network of the 2000 Regional Transportation Plan that is proceeding to approval by JPACT and the Metro Council (Metro Resolution No. 00-2969B, pending); and

WHEREAS, The 2000 RTP will be the subject of another Conformity Determination in early fall of 2000; and

WHEREAS, Amendment of the 1995 RTP and the FY 2000 MTIP triggered a need to prepare an Air Quality Conformity Determination, included as Exhibit A of this resolution, demonstrating that the Commuter Rail project conforms with the State Implementation Plan for maintenance of air quality standards; and

WHEREAS, Metro convened the Intergovernmental Consultation sub-committee of TPAC to confirm the technical basis for preparation of the Conformity Determination; and

WHEREAS, The results of this consultation have been presented for consideration by TPAC which is the standing body authorized by the State Air Quality Rule to conduct Interagency Consultation; and

WHEREAS, Notice of availability of the Determination for a 30-day public review and comment period was posted in the July 9th, 2000, Sunday Oregonian; and

WHEREAS, Any comments generated during this period of review will be presented to the Metro Council in a hearing prior to its consideration and/or approval of this resolution; and

WHEREAS, Any significant issues necessitating JPACT's reconsideration of the resolution and/or the Conformity Determination can cause the Council to remand the issue for further JPACT consideration; now therefore,

BE IT RESOLVED,

1. The Conformity Determination shown in Exhibit A of the Resolution is approved.

ADOPTED by the Metro Council this 17th, day of August, 2000.

David Bragdon, Presiding Officer

Approved as to Form:

Daniel B. Cooper, General Counsel

APPROVÉ APPROVED METRO COUNCIL CONSEIL MÉTROPOLITAIN METRO

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Attachment: Exhibit A

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METRO

Regional Conformity Determination
for
Washington County Commuter Rail
July 12, 2000

I. Introduction

The FY 2000 Metropolitan Transportation Improvement Program (MTIP) approved allocation of $1 million to Washington County to prepare the environmental evaluation for the proposed Wilsonville to Beaverton Commuter Rail transit project. The County has worked with Metro to prepare this analysis, which is nearing completion. Metro and the County anticipate that the Federal Transit Administration (FTA) will issue a Finding of No Significant Impact (FONSI) for addition of the proposed service to the region's mix of transportation options.

The FY 2000 federal appropriation process allocated $500,000 of Section 5309 (New Start) discretionary funds for next phase engineering (30 percent design) to refine the design of the approved project. These additional funds must be amended into the MTIP and the State TIP (STIP) before they can be obligated.

To program the PE funds and to support FTA's expected issuance of a FONSI, the Wilsonville to Beaverton Commuter Rail project must be shown to conform quantitatively and qualitatively with the State (Air Quality) Implementation Plan (SIP). If a conformity finding is delayed, the FONSI cannot be issued and the region's efforts to secure additional federal discretionary funding for preliminary engineering will most likely be delayed to the end of FY 2001. If programming of the $500,000 is delayed, work on the project will stop, resulting in a loss of momentum for the project and decreased efficiency in concluding project design.

FINDINGS: Metro's quantitative analysis of the project shows that emission budgets established in the SIP for carbon monoxide (CO), and ozone precursor compounds - measured as hydrocarbons (HC) and Oxides of Nitrogen (NOx) - are maintained assuming implementation of the project (see Table 1, below).

Commuter rail is also integrated in the region's overall transit service policies as evidenced by several Metro resolutions endorsing both the overall concept of commuter rail in the region and the specific scope and concept of the current project proposal.

TABLE 1: EMISSION BUDGETS AND CALCUATED EMISSIONS

NOx EMISSIONS (rounded to nearest ton)	2005	2006	2010	2015	2020
HC Budget	51	51	52	55	59
Project Related Emissions Reductions	-0.0036	-0.0038	-0.0045	-0.0054	-0.0066
Regional Emissions w/ project	51	51	52	55	59

HC EMISSIONS (rounded to nearest ton)	2005	2006	2010	2015	2020
HC Budget	42	41	40	40	40
Project Related Emissions Reductions	-0.0028	-0.0029	-0.0033	-0.0038	-0.0045
Regional Emissions w/ project	36	36	36	36	38

CO EMISSIONS (rounded to nearest 000's lbs)	2005	2007	2010	2015	2020
Winter CO Budget	979	947	760	788	842
Project Related Emissions Reductions	-0.0662	-0.0719	-0.0909	-0.0945	-0.01133
Regional Emissions w/ project	691	696	704	716	740

Region's Conformity Status

Metro prepared a Conformity Determination for the 1995 Regional Transportation Plan (RTP) and the FY 2000 – 2003 MTIP in November 1999. The Federal Highway Administration (FHWA) and FTA jointly approved the Determination on January 27, 2000. The Determination is valid for three years unless significant amendment of either the MTIP or RTP is approved in the interim.

Metro Resolution Number 00-2972 (adoption pending) amends the 1995 RTP to include the Wilsonville to Beaverton Commuter Rail project as part of the 20-year regional transportation system. Metro Resolution No. 00-2950 programs the newly appropriated New Start PE funds in the MTIP. Both actions trigger the need for this Determination. No other regionally significant amendment of the MTIP or RTP has been approved. [1] Metro views this Determination as validation of Commuter Rail against the methodological assumptions approved in the January Conformity Determination and anticipates that the three year validity of the prior Determination will continue to govern the region's conforming status lapse date.

[1] In July 2000, Metro approved a new financially constrained system plan as an element of a revised 2000 RTP. This approval will trigger a need to prepare a new Conformity Determination within six months. This system plan includes contemporary assumptions for Commuter Rail scope and concept. A complete model run was conducted for the new plan's 2020 horizon year. This analysis, which meets the State Rule protocol for emission analysis, shows 2020 budgets for all applicable pollutants would be maintained by the new system, including implementation of commuter rail between Wilsonville and Beaverton. However, the new RTP has not yet received federal approval and a complete conformity determination has not been made. At present, regional conformity is still linked to determinations featuring the 1995 RTP system, as amended.

II. Quantitative Methodology

The proposed project has limited effects on a subarea of the region that contains a number of freeway, state highway, arterial and transit travel pathways. Despite numerous travel options, the corridor faces high travel demand during the commute period and is quite congested. After consultation between the MPO and the Oregon Department of Environmental Quality, FHWA and FTA it was concluded that statistical modification of the January 2000 Conformity Determination would be sufficient to demonstrate conformity of commuter rail emissions effects with the SIP. Therefore, rather than running the complete four step model (i.e., trip generation, trip distribution, mode choice and route assignment) this analysis adjusts the output of the four step model process generated in the January 2000 Determination. The prior Determination was prepared to conform the FY 00 MTIP, and also addressed the modified the scope and concept of the Interstate MAX extension project in the RTP.

To make the adjustments and account for the project, transit mode shift estimates developed by Metro for FTA project evaluation were used to modify regional emissions estimates developed in the January Determination. A detailed example of this methodology – in the context of the 2020 analysis year – is included in Attachment 1. An overview of the methodology is provided below with emphasis on those elements agreed to during interagency consultation.

Description of the Project

The project entails refurbishing approximately 14 miles of active freight rail tracks to accommodate dual operation of commuter rail during the three hour a.m. and p.m. peak periods (e.g., 6-9 a.m. and 4-7 p.m.). Four self-propelled diesel multiple unit (DMV) rail cars would be purchased and operate between Wilsonville and Downtown Beaverton, with stops also at Tualatin, Tigard and Washington Square. A total of 12 northbound and 12 southbound trips would be completed daily at half-hour headways. Approximately 2,000 feet of new trackway would be needed in Beaverton. No other revision of the regional road network has been approved by Metro.

FTA NEPA Analysis

Regional emissions effects of the project are linked to estimated ridership. This Determination quantitative analysis draws ridership estimates from the Environmental Assessment (EA) prepared by Metro staff for FTA's evaluation of the project. Estimates were developed by modification of the full demand model used to predict Interstate MAX ridership in the previous approved Conformity Determination. That system was modified to include Washington County Commuter Rail. Metro estimates 2,410 daily commuter rail trips in 2005 and 4,650 trips in 2020. Approximately half of the trips in each year represent new transit trips. The balance represents mode shift from bus transit. Ridership in interim analysis years was estimated as a straight-line interpolation of these two estimates.

1999 Conformity Network

The 1999 Determination did not include commuter rail as a travel option. Therefore, the regional emissions calculated to result from the analysis year travel networks reflect more auto

trips than would occur with commuter rail. These emissions were calculated using data from the Environmental Assessment analysis and were deducted from the regional emissions predicted in the January Conformity Determination analysis years. The EA analysis supplied two critical data elements in this calculation.

First, the EA analysis identified the trips attracted to and from the zone pairs served by the new rail service. Of the 1,260 zones in the regional model, a small subset represent the zones from which demand for the new commuter rail service is derived, e.g., zones encompassing travel demand to and from Wilsonville to Beaverton, Tigard/Washington Square, Washington Square/Beaverton, etc. (see Figure 1). Of the total trips served by commuter rail, about half represent new transit trips in all analysis years. The trip distances between each origin/destination pair newly served by transit were summed to provide the total reduction of vehicle miles traveled (vmt) attributable to the project (e.g., 18,705 vmt saved in 2020).

Second, the EA analysis provided the average auto speed between each distinct origin/destination pair. Speeds between each origin/destination pair, weighted to reflect high vehicle hours traveled on dominant routes versus minor ones, were summed and then averaged. This single average speed (22.3 mph) and the sum of all vmt eliminated by the shift of auto trips to commuter rail were used to calculate emissions reductions attributable to the project. Emission factors were drawn from those approved by DEQ for use in the November Determination. The reductions were then applied to total regional emissions calculated to occur in the January Conformity Determination analysis years of 2005, 2015 and 2020. Emissions in interim analysis years are interpolated (i.e., 2006, 2007 and 2010).

Approximately one-third of all commuter rail trips originate as park and ride auto trips, which, while representing reductions of auto trip length, still entail cold starts, some travel, and evaporative losses after each trip end. These factors were taken into consideration in the emissions analysis. As already shown in Table 1, above, slight reductions of emissions resulted for all analyzed pollutants in all analysis years.

Reassignment of Travel Demand

The methodology described above omits one step of a routine regional model run which is the reassignment of trip demand in the corridors effected by the commuter rail project. Commuters converting from auto to commuter rail "free up" road and freeway capacity. In a complete model run, the entirety of trip demand would be reassigned into this newly available road capacity based on most direct/least-time travel routes. The effect of this reassignment is that a small number of trips would avail themselves of more direct, less congested pathways, with reduced delay, slightly increased speed and less vmt. Though very marginal, the more rigorous analysis would be expected to result in slightly greater emissions **reductions** than reported in this Determination.

Regarding "induced" or "latent" demand, the model accommodates all predicted travel demand resulting from the underlying population and employment assumptions. The model does not assume that trip-making is deferred once some preset congestion level is achieved. Therefore, elimination of some auto-system congestion due to conversion of auto trips to transit trips does

not cause the model to draw new trip demand from some reservoir of unmet "latent" demand. As described above, stipulation of "new capacity" only causes the model to reassign total computed travel demand to more efficient routes.[2]

Budget Years and Calculated Emissions

The State Rule calls for calculation of regional emissions ten years from the base year of the emissions model, at intervals thereafter no greater than ten years apart, and at the horizon year of the regional plan. A 20-year horizon to the analysis was stipulated during interagency consultation. Budget years between analysis years may be interpolated. The region's model base year is 1994. The first analysis year of 2005 was selected because it is the start date anticipated for commuter rail and the Interstate MAX extension projects. Emissions calculated in the PDX Light Rail Conformity Determination (approved Oct. 1998) showed the region meeting established budgets in 2003. No transportation projects are expected to come online until 2005 that would change regional emissions calculated in the PDX analysis.

The second analysis year of 2015 is ten years after 2005 and is a budget year for NOx, Hydrocarbons and Carbon Monoxide. The third analysis year of 2020 extends five years beyond the horizon of the 1995 RTP. The January Determination extrapolated an additional five years of population and employment, by zone, and assigned resultant travel demand over a static 2015 regional roadway network, and a redistributed transit network reflecting the region's commitment of 0.5 percent annual transit service increases. Key assumptions guiding deployment of the added increment of transit service was increased service to outlying urban reserve locations expected to begin significant buildout after 2015 and redeployment of line haul service to feeder route service around light rail radial routes and the Wilsonville to Beaverton commuter rail alignment.

Emissions for interim budget years: 2006 (ozone precursors), 2007 (CO) and 2010 (ozone and CO) were interpolated as permitted by the rule.

III. Qualitative Analysis

Virtually all elements of the January qualitative analysis remain valid at this time. The regional endorsement of Commuter Rail reflected in this programming action has been preceded by several years of investigation and consideration by the region's transportation technical and policy bodies. In May 1997, Metro approved Resolution No. 97-2507 which concluded that Commuter Rail was not an appropriate cost cutting measure appropriate for consideration in the South/North Corridor and suggested that portions of Washington County might be more suitable for this travel mode. A feasibility study, (financed jointly by Washington County, several cities in the County and ODOT), was conducted and in 1998. On the basis of this study Metro approved Resolution No. 98-2692 allocating partial financing for a Commuter Rail Demonstration run. In 1999, Metro Resolution 99-2878B was approved, adopting a Strategic Transportation System Plan (responding to State land use and transportation planning

[2] There are some other technical changes in both routing and distribution of travel demand that are possible, given a large enough change in system speeds. Speed changes resulting from implementation of the commuter rail project though, were negligible and these issues are irrelevant to the analysis.

requirements) that included commuter rail. Also in 1999, Metro Resolution 99-2830 approved adoption of the FY 00 – 03 MTIP/STIP which allocated $1.0 of regional flexible federal funding for a Washington County Commuter Rail NEPA analysis.

Three additional resolutions provide further endorsement of the project. Resolution 00-2950 amended the MTIP to program the $500,000 of PE funding appropriated to the project by Congress. The second, Metro Resolution No. 00-2972B (pending), approves the Commuter Rail locally preferred alternative and amends the 1995 RTP to include the project scope and concept into the regional transportation system plan. Finally, Resolution No. 00-2969B (pending), adopts the 2000 RTP including a financially constrained regional transportation system plan that includes the Commuter Rail project and all other federally required elements.

IV. Interagency Consultation and Public Outreach Process

Before preparation of this Determination, Metro convened the Interagency Consultation sub-committee of TPAC on June 30, 2000 to discuss the appropriate analysis protocol and other qualitative issues. The following agreements were concluded:

- Metro would determine quantitative conformity of the project using the methodology described above.
- Metro would continue to provide a 30-day comment period on the draft Determination pursuant to the Metro Public Involvement Guidelines. The comment period will last from the date of publication of the Oregonian notice on Sunday, July 9th until closure of the public hearing scheduled before the Metro Council Transportation Committee on Tuesday, August 8.
- TPAC, the entity formally identified as the standing Interagency Consultative body in the State Rule, was briefed on the subcommittee agreements at its June 30th meeting.
- JPACT is the Metro body recognized as the region's MPO by FHWA and FTA. JPACT will approve the Determination at its regular July 13 meeting contingent on a finding by the Metro Council, upon conclusion of the public comment process, that any substantive comments that may be received thereafter are adequately addressed by staff prior to Council approval of the Determination on August 10.
- Should comments be received that require substantive revision of the Determination as approved by JPACT, the Council shall return the Determination to JPACT for further consideration. In light of JPACT's cancellation of the August meeting, a quorum will be convened either at Metro Headquarters, or by teleconference to consider amendments and to act on the revised Determination.
- Assuming federal approval of the Determination, the region's three-year conforming status shall not begin again, but shall instead continue to run from the January 27, 2000 approval of the Determination jointly approved by FHWA and FTA for adoption of the FY 2000 – 2003 MTIP update.

V. Conclusion

The Wilsonville to Beaverton Commuter Rail project will increase transit ridership in a rapidly growing and congested portion of the region. It will cause a reduction of auto trip making in the most heavily congested peak periods. It will reduce regional VMT and associated automotive emissions. Metro's quantitative analysis of the 1995 regional transportation system plan, as amended to include the project, shows that applicable emissions budgets will be maintained if the project is built. A revised RTP, which already contains the project, and for which a complete end-year emissions analysis was conducted, validates this conclusion. A complete determination for this newly adopted plan will be prepared over the next several months.

The region's transportation technical and policy bodies have approved numerous resolutions concerning the project. These actions have addressed the specific consistency of commuter rail with Metro's region-wide commitment to provide balanced transportation options. Project effects on the region's bus service will follow the pattern established for similar extension of light rail in the region: where duplication occurs, radial bus service will be re-deployed as feeder service in order to support the new rail-based line services. All other qualitative aspects of the January Determination remain valid at this time. As with the quantitative analysis, a robust update of the qualitative analysis of the region's transportation system plan will be prepared for the 2000 RTP Determination, later this year.

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Summary of Beaverton-Wilsonville Commuter Rail
Air Quality Conformity Analysis
5/30/00

In order to demonstrate air quality conformity of the Beaverton-Wilsonville Commuter Rail Project in a timely and cost effective manner, emissions were calculated using a variation of the traditional emissions calculation methodology. This approach has been used for other projects with a narrow market influence. For the purpose of evaluating the air quality impact of this project, this condensed methodology is believed to be acceptable. Below is an explanation of this modified approach.

Emissions were computed for only **new** riders on the commuter rail. That is, extra emissions were calculated for those new riders as if they were driving to their destination instead of taking the commuter rail.

This study shows that in 2020 there would be 4650 daily riders on the rail line, of which 2600 are new riders. Of the 2600 new riders, 850 (approximately one-third) are park-and-riders. By looking at the trip table of riders, it was determined the average trip length for the trips in this corridor is 8.6 miles. The table of trips from their home to park-and-ride lot showed that the home-to-lot average distance is 4.3 miles. Average auto speed for the trips is 22.3 m.p.h.

The trip information was then used to determine total daily VMT for the new trips (2600 new trips * 8.6 average distance = 22,360). The VMT of the park-and-ride trips from their home to a lot (850 P&R * 4.3 average distance = 3,655) is subtracted from this total daily VMT. This resulted in 18,705 total VMT to be **saved** from having those trips on commuter rail instead of in autos.

Finally, emissions were calculated using the VMT and speed figures derived above. The same calculations were performed for the years 2005 and 2015. The results are on attached Table 1. The emissions shown were then subtracted from the air quality results for 2005, 2015, and 2020 from the MTIP conformity runs performed last fall, which did **not** include the commuter rail. The emissions saved by the addition of the commuter rail were small and had no significant impact on any of the regional pollutant totals. The final results are shown on Table 2.

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Table 1

Attachment 1 to Exhibit A
to Resolution No. 00-2978

Beaverton-Wilsonville Commuter Rail Emissions Impact Results
6/27/00

2005

	Reduction in Emissions
Winter CO	0.0662 000s of pounds
HC	0.0028 tons
NOx	0.0035 tons

2015

	Reduction in Emissions
Winter CO	0.0945 000s of pounds
HC	0.0038 tons
NOx	0.0053 tons

2020

	Reduction in Emissions
Winter CO	0.1133 000s of pounds
HC	0.0045 tons
NOx	0.0064 tons

Table 2

Attachment 1 to Exhibit A
to Resolution No. 00-2978

Beaverton-Wilsonville Commuter Rail Air Quality Conformity
5/18/00

	000s of pounds	tons	
	Metro WCO	AQMA HC	AQMA NOx
2005			
Budget	979	42	51
Total	691	36	51
2015			
Budget	788	40	55
Total	716	36	55
2020			
Budget	842	40	59
Total	740	38	59

TRANSPORTATION PLANNING COMMITTEE REPORT

CONSIDERATION OF RESOLUTION NO. 00-2978, FOR THE PURPOSE OF ADOPTING THE PORTLAND AREA AIR QUALITY CONFORMITY DETERMINATION FOR AMENDMENT OF THE 1995 RTP (RESOLUTION NO. 00-2969B) AND THE FY 2000 METROPOLITAN TRANSPORTATION IMPROVEMENT PROGRAM (RESOLUTION NO. 00-2950) TO INCLUDE THE WILSONVILLE/BEAVERTON COMMUTER RAIL PROJECT (REFERENCE RESOLUTION 00-2972B)

Date: August 9, 2000 Presented by: Councilor McLain

Committee Recommendation: At its August 8 meeting, the Committee considered Resolution No. 00-2978 and voted unanimously to send the resolution to the Council with a do pass recommendation. Voting in favor: Councilors Bragdon and McLain and Chair Monroe.

Background: Federal and state regulations require that transportation projects may not interfere with attainment or maintenance of air quality standards. The resolution is the second of two resolutions designed to meet federal requirements prior to the receipt of additional federal funding for the Wilsonville/Beaverton commuter rail project. Last month the Council adopted Resolution No. 00-2972B, which identified commuter rail as the locally preferred option for the Wilsonville/Beaverton corridor.

Committee Discussion: Andy Cotugno, Transportation Planning Director, and Mike Hoglund Transportation Planning Manager presented the staff report. They noted that the air quality conformity analysis. The analysis found consistent, but small, reductions in Nox, HC and CO emissions if the project is implemented. These reductions occurred throughout the time period analyzed (Year 2005 to 2020). There would be some minor increase in emissions at or near any park and ride facilities related to the project.

Committee members had no questions.

STAFF REPORT

RESOLUTION NO. 00-2978 FOR THE PURPOSE OF ADOPTING THE PORTLAND AREA AIR QUALITY CONFORMITY DETERMINATION FOR AMENDMENT OF THE 1995 REGIONAL TRANSPORTATION PLAN (RESOLUTION NO. 00-2969B) AND THE FY 2000 METROPOLITAN TRANSPORTATION IMPROVEMENT PROGRAM (RESOLUTION NO. 00-2950) TO INCLUDE THE WILSONVILLE/ BEAVERTON COMMUTER RAIL PROJECT (REFERENCE RESOLUTION 00-2972B)

Date: June 30, 2000 Presented by: Mike Hoglund

PROPOSED ACTION

Approval of this resolution would adopt a regional air quality conformity determination for amendment of the FY 2000 Metropolitan Transportation Improvement Program (MTIP) and proposed amendment of the 1995 Regional Transportation Plan (RTP) to include the Wilsonville/Beaverton Commuter Rail project.

EXISTING LAW

State and federal regulation require that no transportation project may interfere with attainment or maintenance of air quality standards. Preparation of a Conformity Determination is required to demonstrate that significant transportation projects will not cause automotive emissions to exceed emissions budgets established in the State Implementation Plan (SIP) for maintenance of air quality standards.

BACKGROUND AND ANALYSIS

Metro and Washington County, together with several of its cities, have been cooperating in preparation of feasibility analyses and an environmental assessment of commuter rail between Wilsonville and Beaverton, including stops in Tualatin, Tigard and Washington Square. In fall of 1999, Congress appropriated $500,000 to prepare 30 percent design of the new transit service, including rehabilitation of existing freight track and construction of stations and approximately 2000 feet of new trackway. Resolution No. 00-2950 authorized programming of the appropriated federal funds as an amendment of the FY 2000 program year of the MTIP.

The congressionally funded design phase is intended to lead directly to project construction. This requires that the project be amended into the 1995 RTP financially constrained network. Metro Resolution No. 00-2972B, recommended for approval by TPAC at the June meeting and currently pending before JPACT, addresses this need.[1]

[1] Metro Resoluton No. 00-2969B, pending, approves the 2000 RTP financially constrained network, which includes the project. However, a conformity determination on the new network won't be completed until this fall. Consequently, an amended conformity determination for the amended 1995 network is required.

State Air Quality Rule

State and federal regulations require consideration of the project's relationship to SIP for maintenance of air quality standards and thus, Metro has prepared this Conformity Determination. The Determination quantitative analysis (see Exhibit A of the Resolution) shows that the project's potential effects on regional air quality will be consistent with mobile source emissions budgets established in the SIP for Oxides of Nitrogen, Hydrocarbons (i.e., ozone precursor compounds) and Carbon Monoxide.

Interagency Consultation

Metro staff met with representatives of the Oregon Department of Environmental Quality (DEQ) and federal highway and transit administration officials pursuant to state regulations for intergovernmental consultation during preparation of determinations. It was agreed that the project would have very restricted effects given its limited hours of operation, its limited geographic extent and anticipated ridership. Therefore, rather than requiring multiple runs of the region's complete four-step travel model to demonstrate conformity, it was agreed that modification of the region's currently approved Determination would meet the Rule requirements for quantitative assessment of air quality effects.

Because of the limited intent of this analysis, FHWA felt it would be highly inappropriate to view this Determination as a full reaffirmation of the 1995 network. From the perspective of federal transportation officials, the region's approved Conformity Determination will continue to be represented by the January 2000 document. Metro fully anticipates that the region's 2000 RTP update will supercede the 1995 network before the end of calendar year 2000, including preparation of a new comprehensive Determination. In the meantime, the region's federally approved transportation system is reflected in the 1995 financially constrained network and the conforming status of that network will not lapse until January 2003.

Quantitative Analysis Protocol

Under the approved protocol, Metro abstracted ridership estimates and vehicle travel and speed characteristics from the modeled network used in the alternatives analysis prepared for FTA project review. This data was developed using full step model runs in 2005 and 2020. The resultant emissions characteristics were then subtracted from the emissions quantified in the Determination that was prepared for the 2000 MTIP and which was reviewed by EPA and jointly approved by FHWA and FTA on January 27, 2000.

Qualitative Analysis

The State Conformity Rule also requires discussion of numerous other issues that are more concerned with the quality of underlying assumptions used in the quantitative analysis, especially concerning use of most current demographic information and viability of transit system operations and patronage assumptions. The Commuter Rail project makes no substantive alteration of the assumptions used in the January Determination. As with implementation of all rail projects, Tri-Met anticipates reconfiguration of existing bus transit service to feeder service in and around the five new stations. The essential scheme for this reconfiguration was part of the

modeled system used for FTA review of the project. Details of the actual implementation will be worked out in the Tri-Met annual service plan updates.

Schedule for Adoption

There has been some urgency attending preparation and adoption of this analysis. It is anticipated that FTA will issue a Finding of No Significant Impact (FONSI) for the project. This will clear a hurdle for seeking federal FY 2001 appropriations for the project's final design. The FONSI cannot be issued until the project is found to conform with the SIP and if it is delayed, the region may be unable to secure additional final design funding until FY 2002.

Confounding this schedule, JPACT has cancelled its normal August meeting. Therefore, staff has requested JPACT approval of the Determination in July, although the public comment period has not yet been concluded. Past determinations have garnered comment only from DEQ, which is represented on JPACT. Additionally, the Metro Council will hold a public hearing August 8th, two days prior to consideration of the resolution on August 10th. Should any significant issues be raised after JPACT consideration, and which cannot be resolved by staff response to the satisfaction of the Metro Council, the resolution can be remanded to JPACT for further consideration. This "contingent" JPACT approval was deemed an adequate safeguard of public involvement interests during interagency discussion of the dilemma posed by cancellation of the August meeting.

BUDGET IMPACT

None.

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