



U.S. DEPARTMENT OF TRANSPORTATION

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TRANSPORTATION DEPT.

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October 29, 1991

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Andy Cotugno
Transportation Director
Metropolitan Service District
2000 S.W. First Avenue
Portland, Oregon 97201-5398

Through: *Robert E. Royer*
Robert E. Royer, Planning Engineer
Planning Section, Executive House
325 13th NE, Room 605
Salem, Oregon 97310

Dear Mr. Cotugno:

PORTLAND AREA CLEAN AIR ACT CONFORMITY DETERMINATIONS

The Portland-Vancouver Area is currently designated as a non-attainment area for both carbon monoxide and ozone. The 1990 Clean Air Act Amendments require the Metropolitan Planning Organization (MPO) and the U.S. Department of Transportation (DOT) to make conformity determinations for both the Portland Area Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP). In accordance with the June 7, 1991 EPA/DOT Guidance for Interim Conformity, plan conformity should:

Show the plan supports the purpose of the State Implementation Plan (SIP) of achieving attainment of the national ambient air quality standards.

Assure no goals, directives, recommendations or projects identified in the transportation plan will have adverse impacts on the SIP.

Assure the plan provides for expeditious implementation of Transportation Control Measures (TCMs) in the SIP.

Determine that the plan contributes to required ozone and CO emission reductions in non-attainment areas.

Determine that the plan does not increase the frequency or severity of the existing violations of the NAAQS.

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Planning Section

In addition, the EPA/DOT Conformity Guidance states that TIP conformity should:

Be based on the most recent population, employment, travel and congestion estimates available.

Show reductions in emissions from the no-build scenario.

Provide for actions on any federally-assisted TCMs not yet fully implemented.

Show the addition of TCMs substituted for those no longer valid along with evidence of coordination with EPA and State and local air quality agencies in their development.

A Transportation Plan Air Quality Conformity Determination and a TIP Air Quality Conformity Determination for the Oregon portion of the Portland-Vancouver non-attainment area were prepared by the Metropolitan Service District (Metro) (the designated MPO for the Oregon portion of the area) and concurrently submitted to the Federal Highway Administration (FHWA), the Urban Mass Transit Administration (UMTA) and the Environmental Protection Agency (EPA) with Mr. Royer's October 2, 1991 letter. We have reviewed those documents and find they meet the objectives of the EPA/DOT interim conformity guidance.

In order to demonstrate conformity, Metro estimated the emissions changes expected to result from implementation of their RTP and TIP using the EMME/2 transportation software package and EPA's MOBILE 4.0 Mobile Source Emission Factor Model. The base year "no build" network was assumed to be 1990. TIP and RTP "build" networks reflected 1993, 1995, 1996, 2000, and 2010 conditions. These analysis years were selected based on the requirement in the interim conformity guidelines that MPOs demonstrate a reduction in emissions in the first milestone years (1995 for CO and 1996 for ozone), the attainment years (1993 for ozone and 1995 for CO) and a period beyond attainment. The analysis showed less emissions predicted for the build condition as compared to the no build baseline condition for each analysis year. The overall amount of pollutants were shown to decrease between 1990 and 2000 however, CO emissions are predicted to increase again in the year 2010. While this does not violate the conformity guidelines, it does flag a problem that will have to be addressed in the future in order to maintain conformity.

Based on our review of the MPO conformity determinations, reviews of earlier conformity drafts and meetings with ODOT, DEQ and MPO staff during the development of those documents, we find the Portland Regional Transportation Plan and TIP conform with the State Implementation Plan's purpose of reducing the severity and

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number of NAAQS violations and insuring expeditious attainment of the standards. This joint FHWA/UMTA conformity determination has been coordinated with EPA through staff contacts and the sharing of draft and final conformity documentation.

Sincerely yours,



Robert G. Clour
FHWA Division Administrator
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Salem, Oregon 97301



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cc:

OSHD (W. Anhorn, Deputy State Highway Engineer)