

BEFORE THE METRO COUNCIL

FOR THE PURPOSE OF RECOMMENDING ) RESOLUTION NO. 96-2260  
TO THE ENVIRONMENTAL QUALITY )  
COMMISSION THE TRANSPORTATION ) Introduced by Rod Monroe,  
CONTROL MEASURES (TCM'S), CON- ) Chair, JPACT  
TINGENCIES, AND EMISSIONS )  
BUDGETS TO BE INCLUDED IN THE )  
PORTLAND REGION'S OZONE AND )  
CARBON MONOXIDE (CO) MAINTENANCE)  
PLANS )

WHEREAS, The Clean Air Act Amendments (CAAA) of 1990 confirmed the Portland metropolitan area's nonattainment status by designating the region as moderate nonattainment for Carbon Monoxide (CO) and marginal nonattainment for Ozone; and

WHEREAS, The CAAA of 1990 required the Portland metropolitan area to attain the Ozone standard by 1993 and the CO standard by 1995; and

WHEREAS, The Portland region has met the federal standards for Ozone and CO and can apply for redesignation to attainment status with the Environmental Protection Agency (EPA); and

WHEREAS, In order for the Portland region to be reclassified from nonattainment to attainment, a 10-year maintenance plan must be developed for both Ozone and CO; and

WHEREAS, The maintenance plans must identify strategies for maintaining federal air quality standards, including transportation control measures (TCM's), for incorporation into the State Implementation Plan (SIP); and

WHEREAS, TCM's are measures that reduce emissions by reducing vehicle trips and/or vehicle miles traveled (VMT); and

WHEREAS, The Department of Environmental Quality (DEQ) initiated development of an Ozone Maintenance Plan in 1992 through their work with the Governor's Task Force on Motor Vehicle Emissions Reduction in the Portland Area; and

WHEREAS, The purpose of the Governor-appointed Task Force was to identify the appropriate emission reduction strategies, including TCM's, for inclusion in the Ozone Maintenance Plan; and

WHEREAS, The original recommendations from the Task Force were modified by the 1993 Legislature in HB 2214; and

WHEREAS, DEQ has finalized several components of HB 2214 over the last two years in conjunction with policy and technical advisory committees; and

WHEREAS, DEQ, in cooperation with the City of Portland, Metro and Tri-Met, initiated development of the CO Maintenance Plan in 1991 through the Central City Transportation Management Plan; and

WHEREAS, Under Section 174 of the Clean Air Act, the state on November 13, 1992 designated Metro as lead agency for recommending transportation-related control measures and contingency plans for the Portland region; and

WHEREAS, DEQ and Metro jointly convened a work group to review and recommend TCM's and emission budgets for both Ozone and CO; and

WHEREAS, TCM's identified in the Ozone and CO Maintenance Plans must be implemented consistent with the schedule established in the maintenance plans; and

WHEREAS, The emissions budgets will be used to determine

conformity of regionally significant projects, Transportation Improvement Programs and Regional Transportation Plans; now, therefore,

BE IT RESOLVED,

1. That the Metro Council and JPACT recommend to the Environmental Quality Commission that the Transportation Control Measures as delineated in Exhibit A be included in the Portland region's Ozone Maintenance Plan and Carbon Monoxide Maintenance Plan;

2. That the Metro Council and JPACT recommend to the Environmental Quality Commission that the emissions budgets in Exhibit B be included in the Portland region's Ozone Maintenance Plan;

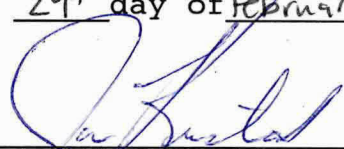
3. That the Metro Council and JPACT recommend to the Environmental Quality Commission that the emissions budgets in Exhibit C be included in the Portland region's Carbon Monoxide Maintenance Plan.

4. That the Metro Council and JPACT recommend to the Environmental Quality Commission that the transportation elements in Exhibits D and E be included in the contingency plans for the Portland region's Ozone Maintenance Plan and Carbon Monoxide Maintenance Plan, respectively.

5. That the Metro Council and JPACT recommend to the Environmental Quality Commission that emission reductions achieved from strategies that are not required by the Ozone and Carbon Monoxide Maintenance Plans be earmarked to increase the

industrial source growth allocation up to the tonnage recommended by the Governor's Task Force on Motor Vehicle Emission Reductions in the Portland Area.

ADOPTED by the Metro Council this 29<sup>th</sup> day of February,  
1996.

  
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Jon Kvistad, Presiding Officer

Approved as to Form:

  
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Daniel B. Cooper, General Counsel

**Portland Region's Ozone and Carbon Monoxide Maintenance Plans  
Transportation Control Measures**

**A. Non-funding based Transportation Control Measures.**

1. **Metro 2040 Growth Concept** (included in both CO and ozone maintenance plans).

Metro's 2040 Growth Concept is being included because it changes typical growth patterns to be less reliant on motor vehicle travel and thus it reduces motor vehicle emissions. Two elements of the land use plan (the Interim Measures and the Urban Growth Boundary) provide appropriate implementation mechanisms to meet Clean Air Act enforceability requirements for control strategies.

a. Metro Interim Land Use Measures relating to:

- i. Change Zoning Maps to Implement the Metro Growth Concept.
- ii. Change zoning text to provide for mixed-uses and compact urban designs in station areas, regional and town centers, mainstreets and corridors.
- iii. Parking
  - Region-wide action to limit required off-street parking consistent with the schedule.
  - Parking maximums will be included either as part of the interim measures or when the Framework Plan is adopted.
- iv. Manage Retail in Employment Areas

*(Specific language will be used from the adopted Functional Plan assuming this plan is adopted before EPA approval of the maintenance plan and the language is not amended to significantly affect the air quality plan's transportation emission projections from current draft language.)*

b. Urban Growth Boundary

The Urban Growth Boundary (UGB) as currently adopted or amended before EPA approval of the maintenance plan assuming an amendment does not significantly affect the air quality plan's transportation emission projections.

2. **Central City Parking Requirements** (CO maintenance plan only).

*City of Portland Zoning Code provisions related to parking in the area covered by the Central City Transportation Management Plan agreed on by DEQ and the*

City will be included in the CO maintenance plan.

3. **DEQ Employee Commute Options Program** (ozone maintenance plan only).

A 10% trip reduction target will be required for employers who employ 50 or more employees at the same work site.

4. **DEQ Parking Ratio Program** (ozone maintenance plan only).

Implement a voluntary parking ratio program providing incentives to solicit participation, including exemption from the Employee Commute Options program.

#### **B. Funding based Transportation Control Measures.**

1. **Increased Transit Service** (included in both CO and ozone maintenance plans, except the Central City commitment which will be included only in the CO plan).

a. Regional increase in transit service hours averaging 1.5% annually. This commitment includes an average annual capacity increase in the Central City area equal to the regional capacity increase. The level of transit capacity increase is based on the regional employment growth projections adopted by Metro Council on Dec. 21, 1995. These projections assume that the Central City will maintain its current share of the regional employment. Should less employment growth occur in the Region and/or the Central City, transit service increase may be reduced proportionally.

b. Completion of the Westside Light Rail Transit facility.

c. Completion of Light Rail Transit (LRT) in the South/North corridor by the year 2007.

2. **Bicycle and Pedestrian Facilities** (included in both CO and ozone maintenance plans).

a. Multimodal facilities.

Consistent with ORS 366.514<sup>1</sup>, all major roadway expansion or reconstruction projects on an arterial or major collector shall include pedestrian and bicycle

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<sup>1</sup> This provides for the following exceptions:

- absence of any need;
- contrary to public safety; and
- excessively disproportionate cost.

improvements where such facilities do not currently exist. Pedestrian improvements are defined as sidewalks on both sides of the street. Bicycle improvements are defined as bike ways within the Metro boundary and shoulders outside the Metro boundary but within the Air Quality Maintenance Area.

b. RTP Constrained Bicycle System.

In addition to (B)(2)(a) above, the region will add at least a total of 28 miles of bicycle lanes, shoulder bikeways or multi-use trails to the Regional Bicycle System as defined in the Financially Constrained Network of Metro's Interim Federal RTP (adopted July 1995) by the year 2006. Reasonable progress toward implementation shall mean a minimum of five miles of new bike lanes, shoulder bikeways or multi-use trails shall be funded in each two year Transportation Improvement Program funding cycle.

Bike lanes are striped lanes dedicated for bicycle travel on curbed streets, a width of five to six feet is preferred; four feet is acceptable in rare circumstances. Use by autos is prohibited. Shoulder bikeways are five to six foot shoulders for bicycle travel and emergency parking. Multi-use trails are eight to 12 foot paths separate from the roadway open to non-motorized users.

c. Pedestrian facilities.

In addition to (B)(2)(a) above, the region will add at least a total of nine miles of major pedestrian upgrades in the following areas, as defined by Metro's Region 2040 Growth Concept: Central City/Regional Centers, Town Centers, Corridors & Station Communities, and Main Streets. Reasonable progress toward implementation shall mean a minimum of one and a half miles of major pedestrian upgrades in these areas shall be funded in each two year Transportation Improvement Program funding cycle.

C. TCM Substitution.

TCMs identified may be substituted in whole, or in part, with other TCMs providing equivalent emission reductions. Substitution will occur through TPAC/JPACT consultation. Such substitution will require EQC, but not EPA, approval.

**Portland Region's Ozone Maintenance Plan  
Transportation Emission Budget**

Regional Emission Budgets for Volatile Organic Compounds and Nitrogen Oxides applicable to all on-road transportation emissions within the Portland Air Quality Maintenance Area will be established for each year from 1996 through 2006. The budgets will be established consistent with Metro's current emission forecast for the maintenance plan.

Emission budgets for 2007 through 2026 will be established using a growth factor consistent with the VMT growth rate in the Region 2040 forecast and the emission factor forecast. These future emission budgets will be accommodated in subsequent maintenance plans through appropriate measures such as:

- Updated population and VMT forecasts;
- New federal motor vehicle emission reduction strategies; and
- New state emission reduction strategies, if needed, to reduce on-road emissions.



**Portland Region's Carbon Monoxide Maintenance Plan  
Transportation Emission Budget**

Three emission Budgets for Carbon Monoxide will be established for each year from 1996 through 2006:

- A regional emission budget applicable to all on-road transportation emissions within the Portland Air Quality Maintenance Area;
- A subregional emission budget applicable to all on-road transportation emissions within the 82nd Avenue area;
- A subregional emission budget applicable to all on-road transportation emissions within the CCTMP.

The budgets will be established consistent with Metro's current emission forecast for the maintenance plan, and:

- Maintaining the wintertime oxygenated fuel program at least until the winter of 1998-1999 (when enhanced inspection and maintenance is fully phased in). At that time the program will be re-evaluated to determine whether it should be continued.

Emission budgets for 2007 through 2026 will be established using a growth factor consistent with the VMT growth rate in the Region 2040 forecast and the emission factor forecast. Future emission budgets will be accommodated in subsequent maintenance plans through appropriate measures such as:

- Updated population and VMT forecasts;
- New federal motor vehicle emission reduction strategies;
- New state emission reduction strategies, if needed, to reduce on-road emissions.

**Portland Region's Ozone Maintenance Plan  
Contingency Plan Elements**

- (1) If emissions exceed maintenance plan projections or the ambient standard is exceeded twice in 3 years, the Department conducts a study and recommends one or more of the following:
  - reformulated gasoline (after 2005), congestion pricing, or other appropriate control measure;
  - additional studies to determine if further measures are needed; or
  - no further action because the problem was caused by emission factor changes, temporary emission increases or an exceptional event.
  
- (2) If a violation of the standard occurs:
  - Major new and modified industry will be required to meet nonattainment area New Source Review Requirements (LAER and offsets). Any remaining growth allowance will be eliminated.
  - The Department will consider opting-in to the federal reformulated gasoline program unless:
    - It is prior to 2005, or
    - EPA rules do not allow the Portland area to opt-in

If reformulated gasoline is not implementable, the Department will convene an advisory committee to develop a congestion pricing program or identify an equivalent measure.

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Note: A violation occurs if there are 4 exceedances of the standard in any 3 year period at the same monitoring site.

**Portland Region's Carbon Monoxide Maintenance Plan  
Contingency Plan Elements**

(1) If the second high concentration of CO monitored equals or exceeds 8.1 ppm (90% of the CO standard), the Department convenes a planning group. The planning group will recommend one of the following:

- Implement an additional emission reduction strategy including, but not limited to:
  - increased parking pricing in the Central City;
  - increased funding for transit;
  - congestion pricing on major regional transportation corridors;
  - oxygenated fuel;
  - trip reduction program;
  - regional mandatory parking ratios; or
  - accelerated implementation of bicycle and pedestrian networks;
- Conduct additional studies to determine if further measures are needed; or
- Take no further action because the problem was caused by an exceptional event.

(2) If a violation of the standard occurs within the Downtown Parking and Circulation Policy Area, as defined in the 1982 CO attainment plan:

- Major new and modified industry will be required to meet nonattainment area New Source Review Requirements (LAER and offsets). Any remaining growth allowance will be eliminated.
- The downtown parking lid will be reinstated.
- Oxygenated gasoline at 2.7% weight will be required.

(3) If a violation of the standard occurs outside of the Downtown Parking and Circulation Policy Area, as defined in the 1982 CO attainment plan:

- Major new and modified industry will be required to meet nonattainment area New Source Review Requirements (LAER and offsets). Any remaining growth allowance will be eliminated.
- Oxygenated gasoline at 2.7% weight will be required.

Note: A violation occurs if the second high in any calendar year at a monitoring site is greater than 9 ppm.

State of Oregon  
Department of Environmental Quality

Memorandum

Date: February 9, 1996

To: Metro Transportation Planning Committee/Metro Council

From: John Kowalczyk

Subject: Resolution No. 96-2260, Final Recommendations

The attached draft resolution reflects final recommendations made by TPAC and JPACT at their respective January 26, 1996 and February 8, 1996 meetings. It is scheduled for final recommendations of the Metro Council on February 29, 1996. Please note the following:

**BE IT RESOLVED 5., Industrial Growth Allowance**

Resolution 5 was added by TPAC and supported by JPACT to address concerns that the reduced industrial growth allowance may not be sufficient. If the growth allowance is used up, emission offsets would be required. In making this recommendation it was understood by TPAC/JPACT, that if Metro itself creates some additional enforceable vehicle emission reductions through TDM or other measures, these would be used to increase the industrial growth allowance instead of being used as a substitute transportation control measure or credited against the transportation emission budget.

DEQ has proposed to reduce the approximately 1100 ton per year VOC industrial growth allowance recommended by the Governor's Task Force on Motor Vehicle Emission Reductions in the Portland Area (based on the historic industrial growth rate) to approximately 500 tons per year. This action was proposed because of a shortfall in the expected voluntary unused industrial permitted emission donation program and because DEQ believes it is more prudent to implement less stringent ECO, Parking Ratio and Vehicle Inspection Boundary Expansion programs. While prominent representatives of industry are concerned about the reduction in the growth cushion, they recognize that advancements in new emission control technology may result in industrial emissions increasing at less than the historic growth rate. These industrial representatives also recognize the substantial political resistance to more stringent ECO, Parking and Vehicle Inspection Program Boundary expansion programs.

DEQ is committed, if possible to increasing the industrial growth allowance in the future. Such actions as plant closures, and future voluntary donations of unused permitted emissions may provide additional means of increasing the growth allowance. Additionally, JPACT requested and DEQ agreed to report back to Metro within a couple years on the actual use of the growth cushion and on efforts to increase it.

**EXHIBIT A, 1., Metro 2040 Growth Concept**

The title was changed from the Metro 2040 Land Use Plan to the Metro 2040 Growth Concept to more accurately reference the land use and transportation aspects of the Plan. The UGB

expansion assumed in the transportation-emission model of the 2040 Growth Concept is approximately 4000-5000 acres.

#### **EXHIBIT A, item 2., Central City Parking Requirements**

Numerous parts of the 199 page Central City Transportation Management Plan Zoning Code have been identified by the City of Portland and DEQ as appropriate for inclusion in the CO maintenance plan. Anyone wishing to review this material prior to the meeting should contact Howard Harris @ 229-6086.

#### **EXHIBIT B, item 1., Increased Transit Service**

(a) The Central City transit service increase assumed in the maintenance plan has been incorporated into the regional transit increase language. A provision has been included to allow scaling down either or both transit service increases if actual employment growth in either or both areas is less than currently projected.

(c) An equivalent High Capacity Transit alternative for the South/North Light Rail Transit Line has been deleted. Since the proposed maintenance plans will provide for the substitution of Transportation Control Measures which achieve equivalent emission reductions, Metro may pursue such an alternative in the future if necessary. Should either transit service option or other equivalent Transportation Control Measures be found not feasible by Metro, DEQ would need to identify an equivalent emission control strategy and modify the maintenance plan accordingly.

#### **EXHIBIT B, item 2., Bicycle and Pedestrian Facilities**

(a) JPACT replaced "bike facilities" with "bikeways" in line seven. This action provides consistency in application and design with state law.

(b) JPACT changed the "Bicycle Facilities" title of this provision to the "RTP Constrained Bicycle System" and more specifically defined Metro's Interim Federal RTP as the "Financially Constrained Network" to provide clarity and insure progress is made on the RTP Bike System.

#### **EXHIBITS B and C, Emission Budgets beyond 2006**

The language included in the Ozone and CO Transportation Emission Budget items references Metro's 2040 VMT constrained transportation emission forecasts beyond 2006 as the transportation emission budgets beyond 2006. This approach should avoid conformity problems beyond 2006 and appears to be acceptable to EPA.

#### **EXHIBIT C. Oxygenated Fuel**

TPAC/JPACT recommended to keep the oxygenated fuel requirement until the winter of 1998-1999 at which time it would be reevaluated as to whether it is still needed.

TPAC/JPACT were provided with the latest cost impact information on oxygenated fuel submitted to DEQ by the Petroleum and Ethanol Industries. They did not see this information as a reason to change their recommendations. This information is summarized in the attached chart. DEQ has not fully analyzed this information and does not have a position on the cost impact at this time.

DEQ informed JPACT that it has not been clarified as yet whether the state has legal authority under the Clean Air Act to retain the oxygenated fuel requirement if it is not needed to maintain attainment. In consideration of this situation JPACT qualified its recommendation to apply only if it is legal to do so.

#### **EXHIBIT D, Ozone Contingency Plan**

Concern was raised that the Downtown Portland Parking Lid was referenced in the ozone attainment plan as well as the CO attainment and therefore it would need to be included in the ozone contingency plan and automatically reinstated if a violation of the ozone standard occurred. Further research into this issue concluded that, while mentioned in the ozone attainment plan, no emission reduction credit was taken for this measure. Therefore, the parking lid would not need to be included in the ozone contingency plan.

#### **EXHIBIT E, CO Contingency Plan**

TPAC raised the question whether the downtown parking lid would be reinstated if a CO violation occurred at the 82nd monitoring site. Since implementation of the parking lid in the downtown area would have little impact on reducing emissions at the 82nd Ave. monitoring site, EPA and DEQ have agreed that the downtown parking lid will only have to be reinstated if a violation is recorded in the downtown area. JPACT amended this contingency plan with language that clarifies that the parking lid would only be reinstated if a CO violation occurs within the Downtown area.

## Summary of Oxygenated Fuel Cost Impact Information Submitted to DEQ (1)

Revised 1/25/96

### From Western States Petroleum Association

	Annual Cost	Equivalent \$/gal
Fuel Economy Loss (1.9% loss)	\$4,404,200	
Wholesale Cost Increase (2)	\$2,955,800	\$0.016 (3)
Federal Subsidy	\$7,750,000	

### From Northwest Bio-Products Coalition

Fuel Economy Loss (4)		
Producer Cost (5)		
Producer who does not modify subgrade	\$380,815	\$0.003 (6)
Producer who modifies subgrade	-\$399,312	-\$0.007 (7)
Federal Renewable Alcohol Excise Tax Exemption		\$0.0 (8)

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(1) Based on 183,968,547 gallons of gasoline sold from November 1994 through February 1995.

(2) Use \$1.28/gallon cost for ethanol.

(3) Based on regular unleaded grade; WSPA indicated costs would not change significantly, or at all, if other grades were analyzed.

(4) Acknowledge EPA report of 1.9% loss but assert more than offset by lower gasoline prices in winter because of increased supply and lower demand.

(5) Use \$1.25/gallon cost of ethanol. Subgrade modification reduces octane (cost) of base gasoline which is compensated for by higher octane of ethanol.

(6) Average cost of all grades (for regular grade only, cost was calculated at \$0.014. Dollar amounts are based on estimated 31% market share for producer modified subgrade, Multnomah County year end 1994 fuel sales.

(7) Savings

(8) Net savings to the federal treasure indicated by September 14, 1995, report from the Resource Community Development Division of Government Accounting Office (95-273R); response to Senator Grassle, i.e., more planting of corn for ethanol production reduces farm subsidies.

## STAFF REPORT

CONSIDERATION OF RESOLUTION NO. 96-2260 FOR THE PURPOSE OF RECOMMENDING TO THE ENVIRONMENTAL QUALITY COMMISSION (EQC) THE TRANSPORTATION CONTROL MEASURES (TCM'S), CONTINGENCIES, AND EMISSIONS BUDGETS TO BE INCLUDED IN THE PORTLAND REGION'S OZONE AND CARBON MONOXIDE (CO) MAINTENANCE PLANS

Date: December 27, 1995

Presented by: Andrew Cotugno

### PROPOSED ACTION

This resolution provides that the Metro Council and JPACT recommend to the Environmental Quality Commission (EQC) the Transportation Control Measures (TCM's) and the Transportation Emissions Budgets to be included in the Portland region's Ozone and Carbon Monoxide (CO) Maintenance Plans.

TPAC and JPACT, at their January 26 and February 8 meetings, respectively, recommended approval of Resolution No. 96-2260 as amended. In reviewing the resolution and exhibits, they made the following changes:

1. Bicycle Transportation Control Measures. TPAC recommended that the language in Exhibit A, item B.2.a. and B.2.b. reflect that bicycle "improvements" should be defined as "facilities" as opposed to "lanes." This language would allow for more flexibility in defining specific and appropriate language on a project-by-project basis. The new language is included in the attached Exhibit A. JPACT further amended this to refer to bike "ways" and reference the bike ways in the Financially Constrained RTP.
2. Industrial Growth Cushion. TPAC recommended that language be added to Exhibit B that would direct that any future emission surplus be applied to the industrial growth cushion to the level that the cushion was originally set during the 1992 Governor's Task Force on Vehicle Emission Reductions in the Portland Area. That language is included on Exhibit B. DEQ agreed to re-evaluate the status of the growth cushion after two years experience to determine if it is meeting the needs of the region.
3. Oxygenated Fuels. TPAC reviewed new cost information from representatives of the petroleum and ethanol industries. Upon review, TPAC has concluded that there is not sufficient information to warrant a change to the tentative position JPACT took at its January 11 meeting. That position was to maintain an oxygenated fuel program through the 1998-99 season at which time the program will be re-evaluated for continuation into future years. It was further clarified by DEQ at the February 8 JPACT meeting that if continuation of oxygenated fuel is found to be illegal, the region's CO transportation emissions budget would be adjusted accordingly.



4. An amendment was incorporated by JPACT clarifying that the CO Contingency Plan provides for reinstating the Downtown Parking Lid only in the event there is a CO violation in downtown Portland. This change is reflected in Exhibit E.

#### FACTUAL BACKGROUND AND ANALYSIS

The Clean Air Act Amendments (CAAA) of 1990 designated the Portland area as marginal non-attainment for ozone and moderate non-attainment for carbon monoxide (CO).

In accordance with federal law, the standard for ozone was to be met by November 1993 and for CO by November 1995. The Portland region has met the federal standards and can now apply for attainment status with the Environmental Protection Agency (EPA).

In order to be redesignated as attainment, EPA requires that maintenance plans for both ozone and carbon monoxide (CO) be developed. The plans must show how the region will stay in attainment for both pollutants for a period of at least 10 years. The plans must include both base and contingency strategies and be based on the latest travel and emission forecasts provided by Metro.

The Department of Environmental Quality (DEQ) initiated development of the maintenance plans in 1992 through their work with the Governor's Task Force on Motor Vehicle Emissions Reduction in the Portland Area. The purpose of the task force was to recommend strategies to reduce motor vehicle emissions for inclusion in the maintenance plans. Their original recommendations were modified by the 1993 Legislature in HB 2214.

During the past two years, DEQ has been working with citizen, policy and technical committees to finalize the provisions of HB 2214, particularly the transportation elements of the plans. Metro must ensure that the TCM's identified in the Ozone and CO Maintenance Plans are implemented consistent with the schedule established in the maintenance plans.

A joint DEQ and Metro work group was convened to review and recommend TCM's, contingencies, and to establish Emissions Budgets to be used to determine conformity of regionally significant projects, Transportation Improvement Programs and Regional Transportation Plans. New conformity procedures will eliminate the 1990 emission cap and build/no-build tests and substitute the Emissions Budget conformity test upon EPA approval of the Ozone and CO Maintenance Plans.

Upon EQC adoption, TCM's will be incorporated into Metro's RTP consistent with ISTEA guidelines. An approved maintenance plan will ensure a consistent flow of federal transportation funds to the region, allow DEQ to lift certain restrictions on industry, and ensure a clean and healthy Portland area airshed.

It is requested that the Metro Council and JPACT approve the attached resolution recommending specific TCM's, contingencies, and Emissions Budgets to the Environmental Quality Commission.