Air Quality
Conformity Determination

Central Lane MPO
2004-2025 Regional Transportation Plan
and
FY04-06 Metropolitan Transportation Improvement Program

December, 2004
Air Quality Conformity Determination for Central Lane MPO 2004-2025 Regional Transportation Plan and FY2004-2006 Metropolitan Transportation Improvement Program

Published by
Lane Council of Governments
99 East Broadway, Suite 400
Eugene, Oregon 97401-3111

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RESOLUTION 2004-07

ADOPTING THE AIR QUALITY CONFORMITY DETERMINATION FOR THE REGIONAL TRANSPORTATION PLAN AND THE FY2004-2006 TRANSPORTATION IMPROVEMENT PROGRAM

WHEREAS, the Lane Council of Governments Board has been designated by the State of Oregon as the official Metropolitan Planning Organization (MPO) for the Central Lane region; and

WHEREAS, the LCOG Board has delegated responsibility for MPO policy functions to the Metropolitan Policy Committee (MPC), a committee of officials from Eugene, Springfield, Coburg, Lane County, Lane Transit District, and ODOT; and

WHEREAS, the Air Quality Conformity Determination is required to secure funding for transportation projects in the area; and

WHEREAS, the Air Quality Conformity Determination under OAR 340-252-0090 meets the financial constraint requirement complying with 40 CFR 93.108; and

WHEREAS, the Air Quality Conformity Determination under OAR 340-252-0190 meets the emissions budget as set forth in the Federal Register, Vol. 58, No 232, page 64163, December 6, 1993; and

WHEREAS, the Air Quality Conformity Determination under OAR 340-252-0060(4) meets the requirements for public comment; and

WHEREAS, the Air Quality Conformity Determination under OAR 340-252-0060 has met the requirements for interagency consultation complying with 40 CFR 93.105; and

WHEREAS, through the Air Quality Conformity Determination, the Regional Transportation Plan and the FY04-06 MTIP has been shown to meet the requirements of the Clean Air Act Amendments and Oregon Conformity Rule.

NOW, THEREFORE, BE IT RESOLVED:

That the Metropolitan Policy Committee adopts the Air Quality Conformity Determination for the Regional Transportation Plan, as set forth in Exhibit A, attached to and incorporated by reference to this resolution, and for the FY04-06 MTIP, as currently adopted and incorporated by reference to this resolution.

PASSED AND APPROVED THIS 9th DAY OF DECEMBER, 2004, BY THE METROPOLITAN POLICY COMMITTEE.

ATTEST:

George Kloeppe1
Executive Director
Lane Council of Governments

Bonny Betman, Chair
Metropolitan Policy Committee
Mr. Tom Schwetz  
Transportation Program Manager  
Central Lane Metropolitan Planning Organization (CLMPO)  
99 East Broadway, Suite 400  
Eugene, OR 97401-3111

RE: USDOT Air Quality Conformity Determination  
2025 Regional Transportation Plan (RTP)  
2004-2006 Transportation Improvement Program (TIP)

Dear Mr. Schwetz:

The Eugene/Springfield urbanized area is currently designated maintenance for carbon monoxide and non-attainment for particulate matter of less than 10 microns ($PM_{10}$). The Clean Air Act (CAA) of 1990 as amended, requires that transportation plans, programs and projects cannot create new National Ambient Air Quality Standards (NAAQS) violations, increase the frequency or severity of existing NAAQS violations or delay attainment of the NAAQS. The Metropolitan Planning Organization (MPO) and the U.S. Department of Transportation (FHWA/FTA) are required to make a transportation conformity determination for both the RTP and TIP in non-attainment or maintenance areas that are funded or approved by FHWA/FTA. Transportation conformity ensures that Federal funding and approval are given to those transportation activities that are consistent with air quality goals, and do not worsen air quality or interfere with the purpose of the State Implementation Plan (SIP).

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have completed our review of the Central Lane Metropolitan Planning Organization (CLMPO) conformity determination for the 2025 RTP and the 2004-2006 TIP. The 2004-2006 TIP is being re-conformed at this time to demonstrate that it is consistent with the 2025 RTP. A joint FHWA/FTA air quality conformity determination for the RTP is required by Oregon Administrative Rule (OAR) 340-252-0050, Section 93.104 of the Environmental Protection Agency’s (EPA) August 15, 1997, Transportation Conformity Rule Amendments: Flexibility and Streamlining: Final Rule, 40 C.F.R. Parts 51 and 93 (Transportation Conformity Rule) and the FHWA/FTA Metropolitan Planning Rule, 23 C.F.R. 450. Our USDOT conformity determination is based upon the CLMPO’s conformity determination analysis and documentation submitted to our office by your December 9, 2004 memorandum and attachments.
The Metropolitan Policy Committee adopted the 2025 RTP, and conformity determination on both the 2025 RTP and the 2004-2006 TIP on December 9, 2004. The conformity analysis provided by CLMPO indicates that all air quality conformity requirements have been met. Based on our review, we find that the 2025 RTP and the 2004-2006 TIP conform to the state implementation plan in accordance with 40 C.F.R. Parts 51 and 93; the January 2, 2002, Revised Guidance for Implementing the March 1999 Circuit Court Decision Affecting Transportation Conformity; EPA’s May 14, 1999, Conformity Guidance on Implementation of the March 2, 1999, Conformity Court Decision; and, the Oregon conformity state implementation plan.

This USDOT conformity determination has been developed in accordance with Oregon Administrative Rule (OAR) Chapter 340 Division 252, Transportation Conformity, which defines the procedures and frequency for demonstrating conformity within the State of Oregon. This federal conformity determination was made after consultation with EPA Region X, pursuant to the Transportation Conformity Rule.

This letter constitutes the joint FHWA/FTA air quality conformity determination for the CLMPO’s 2025 RTP and 2004-2006 TIP. If you have any questions regarding this conformity determination, please contact Michelle Eraut, FHWA, at (503) 587-4716 or Jennifer Bowman, FTA at (206) 220-7953.

Sincerely,

David O. Cox
Division Administrator
Federal Highway Administration

R. F. Krochalis
Regional Administrator
Federal Transit Administration

cc:
FTA  (Jennifer Bowman)
     (Rebecca Reyes-Alicea)
EPA  (Wayne Elson)
ODOT (Jill Vosper, STIP Manager)
     (Marina Orlando, Environmental Services)
     (Ted Keasey, ODOT Region 2)
     (Tom Boyatt, Planning Liaison)
LRAPA  (Ralph Johnston)
ODEQ (Dave Nordberg)
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1.0 Overview

This document is prepared by the Central Lane Metropolitan Planning Organization (MPO) in response to federal and state requirements to demonstrate conformity with the Clean Air Act of the 2004-2025 Regional Transportation Plan (RTP). This document also updates the conformity of the current FY04-06 Metropolitan Transportation Improvement Program to meet State requirements of reconforming an MTIP within 6 months of the adoption of a new RTP.

Federal air quality conformity requirements are described in 40 CFR Part 93. Oregon’s Conformity SIP, adopted by the Oregon Environmental Quality Commission under OAR 340-200-0040 and approved by EPA, establishes rules and standards for determining air quality conformity of transportation plan, programs and projects within Oregon (specifically, OAR 340 Division 252). By meeting the Oregon standards for purposes of demonstrating air quality conformity, the federal standards are also met.

1.1 Organizational Structure

Lane Council of Governments (LCOG) serves as the Metropolitan Planning Organization (MPO) for central Lane County, Oregon, an area that includes the Eugene-Springfield metropolitan area. The Governor of Oregon designated LCOG as the MPO for this area in 1974.

As MPO, LCOG must ensure that the transportation planning process is conducted in accordance with federal transportation planning regulations (23 CFR 450). In addition, transportation planning must be consistent with the Statewide Transportation Planning Rule (TPR, OAR 660 Division 12), the Oregon Transportation Plan, and the Eugene-Springfield and Coburg Transportation System Plans. As MPO, LCOG is responsible for preparation of the regional long range transportation plan (RTP) (23 CFR 450.322) and the metropolitan transportation improvement program (MTIP) (23 CFR 450.324), and for making corresponding conformity determinations. In particular, LCOG provides technical modeling of the transportation system, prepares financial analyses and project programming, provides opportunities for public involvement, and manages the analysis and process for ensuring compliance of the RTP and MTIP with the federal (40 CFR 93) and state (OAR 340-252) requirements of the Clean Air Act.

The decision-making body of the Central Lane MPO is the Metropolitan Policy Committee (MPC) which was created by Eugene, Springfield and Lane County for ensuring cooperation on issues of metro-wide importance. When considering transportation issues, MPC is currently comprised of elected officials from Lane County and the cities of Springfield, Eugene, and Coburg, Lane Transit District (LTD) and the Oregon Department of Transportation (ODOT).

The Transportation Planning Committee (TPC) is comprised primarily of technical staff from the public works and planning departments of local agencies. TPC advises MPC on technical transportation issues, reviews all of the transportation documents produced by LCOG, and recommends plans and actions to MPC for review and adoption. TPC is specifically designated by OAR 340-252-0060(2)(b)(A)(i) as the standing committee for purposes of consultation required under the Oregon transportation conformity rules for air quality planning.
1.2 Status of Air Pollutants

The Environmental Protection Agency (EPA) has established health-based National Ambient Air Quality Standards (NAAQS) for six air pollutants (carbon monoxide (CO), particulate matter (PM$_{10}$ and PM$_{2.5}$), ozone ($O_3$), sulphur dioxide (SO$_2$), nitrogen dioxide (NO$_2$) and lead (Pb)) Areas that fail to meet the standards are designated “non-attainment” and are required to develop plans to come into compliance with the standards. Once compliance is achieved, a maintenance plan is developed to ensure that air quality will not be compromised in the future. These plans are codified in the State Implementation Plan (SIP). The Eugene/Springfield area is currently classified as maintenance for CO and as non-attainment for particulate matter of less than 10 microns (PM$_{10}$). EPA has determined that transportation is a significant source for CO but not for PM$_{10}$. Air quality for all other criteria pollutants meets the NAAQS and demonstration of conformity for these pollutants is not required.

LCOG, as the area’s MPO, was designated by the Governor in 1978 as the lead agency for air quality planning for transportation pollutants, and thus has responsibilities for CO conformity. Lane Regional Air Pollution Authority (LRAPA) is the lead agency for air quality planning for all other pollutants, and in particular, for PM$_{10}$.

**Status of CO**

On February 4, 1994, the Eugene-Springfield region reached a significant milestone in its transportation planning efforts. Effective on that date, the area was officially redesignated by EPA as being in attainment of the NAAQS for CO. The region’s maintenance plan was approved by EPA as part of the same action that approved the region’s redesignation request (see the Federal Register Notice, 58 FR 64161 in Appendix G). The maintenance plan is currently being updated for 2004-2014.

There has not been a violation of the CO NAAQS in the maintenance area since 1980 (Figure 1).

While these data show that CO levels are in compliance with the NAAQS and are steadily declining, demonstration of conformity relies upon compliance with the regulations in 40 CFR Part 93 and equivalently, OAR Chapter 340 Division 252, to which this document responds.
Air Quality Conformity Determination

Eugene-Springfield Carbon Monoxide Levels
LCC Downtown Center

![Eugene-Springfield Carbon Monoxide Levels](image)

Figure 1. Trends in carbon monoxide levels from 1976 through 2003. The last violation of the National Ambient Air Quality Standards for 8-hour average CO concentration was in 1980. The last exceedence of the standard was in 1985.

Status of PM$_{10}$

On August 7, 1987, the Eugene-Springfield region was designated as a non-attainment area for PM$_{10}$. LRAPA is in the process of applying to the federal Environmental Protection Agency for a redesignation to attainment status for PM$_{10}$. The formal application to Oregon Department of Environmental Quality, the Oregon Environmental Quality Commission, and, finally, to EPA, is expected to made in March, 2005. Redesignation by EPA would then place the region into a maintenance period for PM$_{10}$.

The Eugene-Springfield PM$_{10}$ State Implementation Program (SIP), approved by EPA in 1994, established that emissions from motor vehicles are not a significant contributing factor to overall PM$_{10}$ emissions and concluded that control of emissions from motor vehicles is not necessary to demonstrate attainment with the PM$_{10}$ standards. As indicated by EPA’s letter of October 3, 1994 (see Appendix A), the Agency concurred that transportation conformity determinations for PM$_{10}$ are not required. Therefore, no additional analysis of PM$_{10}$ is presented here.

1.3 Purpose of this Determination

As required by federal (40 CFR 93.104) and state (OAR 340-252-0050) conformity regulations, a new RTP or MTIP must be shown to demonstrate conformity with Clean Air Act before the plans are adopted by the MPO. On December 9, 2004, MPC adopted the 2004-2025 Central...
Lane MPO RTP. The 2004-2025 RTP fulfills the requirement under 23 CFR 450.322(a) to update the RTP at least as frequently as every three years. Conformity of the current FY04-06 MTIP must be demonstrated within 6 months of a significant change in the RTP under OAR 340-252-0050(3)(d) -- this conformity determination will address this State requirement.

The prior RTP (also known as TransPlan) was first adopted in December 13, 2001. USDOT accepted the conformity determination in a letter dated September 7, 2001 (Appendix A). TransPlan served both as the federally required long range transportation plan for this area, and also as the Transportation Functional Plan for the Eugene-Springfield Metropolitan Area General Plan (Metro Plan). Its geographic area covers the Eugene-Springfield urbanized area as described by the 1990 Census and approximates the Metro Plan boundary (Map 1). Participating agencies include the cities of Eugene and Springfield, Lane County, LTD, ODOT, and LCOG.

On July 8, 2002, USDOT designated the Central Lane metropolitan area as a Transportation Management Area (TMA). This action required expansion of the transportation planning boundary to include the contiguous geographic area likely to become urbanized within the next 20 year period. The TMA boundary, which includes the City of Coburg (Map 1), was approved by the USDOT in a certification review on May 8, 2003, and was subsequently adopted by MPC on August 7, 2003. As required by the certification review, the RTP must be updated to incorporate the TMA by December 13, 2004. The 2004-2025 RTP accomplishes this requirement. In particular, the regional transportation model has been updated from 295 to 306 transportation analysis zones in order to include the Coburg area (Map 1). The Coburg transportation network has been added to the model, and cordon points have been added to appropriate locations near Coburg. Population, employment and land use assumptions, and base conditions of the model are consistent with the TMA area.

Upon the adoption of the 2004-2025 RTP by the MPO, the cities of Eugene and Springfield will continue to meet the transportation system plan requirements of the State of Oregon through the Eugene/Springfield Metropolitan General Area Transportation System Plan, i.e. through TransPlan. Coburg’s current TSP was acknowledged in September 1999. It is currently being updated with adoption anticipated in mid-2005.
2.0 Demonstration of Conformity for CO

The December 6, 1993, Federal Register notice of Approval and Promulgation of Redesignation (58 FR 64161, Appendix G) recognizes the nature of the CO emissions problem in the Eugene-Springfield region to be within the Central Area Transportation Study (CATS) boundary. It reads:

_Due to the nature of Eugene’s CO violation, (i.e., hot spots only) LRAPA’s emission inventory contains only on-road mobile and home wood heating emissions within the Central Area Transportation Study boundary. All point sources within the Eugene AQMA are located at a sufficient distance away as to not contribute significantly to the violations._

In a letter dated October 3, 1994, attached in Appendix A, EPA approved and concurred that regional emissions tests for CO apply only to projects within the CATS boundary (downtown Eugene, Map 2) for purposes of conformity.

All regionally significant and/or Federally funded projects in the RTP and MTIP were modeled based on the most recent population (issued May 2004 by Oregon Office of Economic Analysis), employment (issued October 2003 by Oregon Employment Department), travel and congestion estimates, as required by EPA conformity guidance. The CATS area was evaluated for CO emissions. The forecasts were reviewed by TPC, acting as the region’s Standing Committee on Air Quality, and also by air quality specialists from USDOT, EPA, and ODOT, consistent with requirements for interagency consultation.

Map 3 indicates the location of Central Lane MPO projects programmed in the FY04-06 MTIP (see Appendix B for project list). Map 4 shows the financially constrained projects planned as capital investment actions within the CATS area during the planning period of the RTP (see Appendix C for project list and for project maps covering the entire TMA).

2.1 General Requirements


This conformity determination conforms the Central Lane MPO 2004-2025 RTP and reconforms the FY04-06 MTIP.

A new transportation plan must be found to conform before the plan is approved by the MPO or accepted by USDOT. This conformity determination and the 2004-2025 plan were adopted on December 9, 2004. The RTP must be conformed no less frequently than every three years. The prior RTP was last amended and conformed on July 20, 2004 (see USDOT letter included in Appendix A). The conformity determination described in this document marks the beginning of the next three year cycle for the RTP.
Under the Oregon Conformity SIP rules (OAR 340-252-0050(3)(d)), an existing TIP must be reconformed within six months from the date of conformity of a new or revised transportation plan. This conformity determination reconforms the current FY04-06 MTIP which was last conformed on July 20, 2004 (see USDOT letter included in Appendix A) and thus satisfies the Oregon six-month rule.

**OAR 340-252-0060 and 40 CFR 93.105: Consultation**

Federal, State, and local interagency consultation are required before making conformity determinations. See the response to OAR 340-252-0130 below for details of the consultation carried out for this conformity determination.

The Central Lane MPO is the lead agency responsible for making the conformity determination for the RTP and TIP, performing transportation modeling, regional emissions analyses, and preparing and distributing the draft and final documents. The MPO is the agency responsible for assuring the adequacy of the interagency consultation.

TPC is designated under this regulation as the Standing Committee for the purposes of consultation on Air Quality. Members include representatives of the local jurisdictions of Eugene, Springfield, and Lane County; Lane Transit District; Lane Regional Air Pollution Authority; Oregon Department of Transportation; and FHWA. This committee currently meets monthly. The meetings are open to the public and are advertised by both emails to interested parties, web postings, and media notice.

As described in the response to OAR 340-252-0130 below, the MPO conferred with TPC and consulted other agencies. Opportunities for public review and comment were scheduled through to December 9.
Map 2. Central Area Transportation Study (CATS) Area

as specified in the Carbon Monoxide State Implementation Plan (CO SIP) for Eugene-Springfield
(Note: see Map 1 for the context of this area in relation to the entire TMA.)
## Map 3. FY04-06 MTIP - Programmed Capital Investment Actions

3a: Entire TMA; 3b: CATS Area Detail

### MAP KEY

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Map Key</th>
<th>Project Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eugene</td>
<td>F</td>
<td>Fern Ridge Path Resurfacing</td>
</tr>
<tr>
<td>Eugene</td>
<td>198/Green Dot</td>
<td>Courthouse District Transportation Improvements</td>
</tr>
<tr>
<td>Eugene</td>
<td>450</td>
<td>3rd-4th Connector</td>
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<td>Eugene</td>
<td>G</td>
<td>Judkins Point Interchange/Glenwood Blvd Intersection Improvements</td>
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<td>Eugene</td>
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<td>M</td>
<td>North Bank Trail Resurfacing</td>
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<td>Roosevelt Extension, Terry to Royal</td>
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<td>Eugene</td>
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<td>Garden Way Path Resurfacing</td>
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<td>21st Street Preservation and Reconstruction</td>
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<td>Springfield</td>
<td>799</td>
<td>126 at 42nd Street Ramp Signal</td>
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<td>Springfield</td>
<td>L</td>
<td>Pioneer Parkway Pavement Preservation</td>
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<td>MLK Parkway</td>
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<td>69th Street Upgrade to Urban Standards</td>
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<td>Lane County</td>
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<td>Jasper Road Extension, Main St to 58th, 58th to Jasper</td>
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<td>Delta/Beltline Interchange</td>
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<td>Lane County</td>
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<td>Game Farm North, Eugene City Limit to Coburg Road</td>
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<td>Lane County</td>
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<td>McVay Highway realignment</td>
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<td>Lane County</td>
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<td>Coburg</td>
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<td>Diamond Street Overlay</td>
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<td>Coburg</td>
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<td>Locust Street Improvements</td>
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<td>ODOT</td>
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<td>I105: Willamette River to Pacific Highway, preservation and safety</td>
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<td>D</td>
<td>Operational ITS Improvements-Vehicle Management System</td>
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<td>OR222 Safety Project</td>
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<td>ODOT</td>
<td>336</td>
<td>West Eugene Parkway Unit 1 Part A W. 11th - Garfield</td>
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<tr>
<td>ODOT</td>
<td>J</td>
<td>Hwy 99, Barger to Washington/Jefferson, Overlay</td>
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The Metropolitan Transportation Improvement Program (MTIP) is a listing of transportation improvements scheduled in the Central Lane metropolitan area during fiscal years 2004-2006. The MTIP lists federally funded and locally funded projects that comprise construction and operational improvements anticipated by local agencies and the Oregon Department of Transportation (ODOT).
Maps showing the entire TMA area and all financially constrained roadway, transit and bikeway projects from the RTP can be found in Appendix C.
Since 1994, the Eugene-Springfield area has been classified as in attainment of CO air quality standards. It has not been the previous practice of the MPO to prepare plans which have multiple intermediate horizon years. The 2004-2025 RTP contains a single horizon year of 2025, the end of the forecast period of the RTP. For this year, employment and population were quantified, and land use projections were made based on the acknowledged 2015 comprehensive plan of Eugene/Springfield Metro area and on the long-range Coburg Urbanization Study of April, 2004. Land use designations in these plans were assumed to be in place through the forecast period.

The highway and transit projects described within the RTP are divided into “Financially Constrained” and “Illustrative” implementation phases. All projects are sufficiently identified by design concept, scope, and location to ensure adequate modeling of route options and travel times. Transit policies are described in the RTP. For the purposes of the conformity determination, the 2025 transportation network is composed of the 2002 base transportation network modified by projects completed through 2004, projects now under construction, projects programmed in the FY04-06 MTIP, and projects in the RTP 2025 financially constrained list.

Table 1 provides a summary of the RTP and MTIP financial analyses and demonstrates financial constraint. Appendices B and C provide tabular listings of all projects included in the FY04-06 MTIP and the Financially Constrained projects of the 2004-2025 RTP, respectively. All revenue sources listed in the MTIP table are current. Fiscal constraint is discussed in more detail in Appendix D.

Table 1: Financial Constraint Assessment

<table>
<thead>
<tr>
<th>Description</th>
<th>FY05-26</th>
<th>FY04</th>
<th>FY05</th>
<th>FY06</th>
<th>FY04 - FY06</th>
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<tr>
<td>Total Revenue</td>
<td>$2,048-$2,073</td>
<td>$46,117,734</td>
<td>$105,891,170</td>
<td>$35,834,170</td>
<td>$187,843,074</td>
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<td>Total Expenditures</td>
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<td>$105,891,170</td>
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<tr>
<td>Difference Between Revenues &amp; Expenditures</td>
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</tr>
</tbody>
</table>

Statement of Financial Constraint: Each project included in the Fiscal Constraint list of the Central Lane MPO 2004-2025 RTP and programmed in the FY04-06 MTIP has an identified funding source or combination of sources reasonably expected to be available over the planning period.
2.2 Criteria and Procedures for Determining Conformity

**OAR 340-252-0100 and 40 CFR 93.109: General**

In order to demonstrate conformity of a transportation plan and MTIP, specific criteria listed in OAR 340-252-0110 through 340-252-0190 (40 CFR 93.110 through 93.118) must be addressed. These criteria include using the latest planning assumptions and the latest emissions model, and undertaking interagency consultation and public involvement. Responses to the criteria are listed below. Since the Eugene-Springfield area has been designated by EPA as a CO maintenance area and the CO SIP has been found to be adequate, the conformity test applied is that of the motor vehicle budget test, OAR 340-252-0190 (equivalently 40 CFR 93.118).

**OAR 340-252-0110 and 40 CFR 93.110: Latest Planning Assumptions**

The conformity determination must be based upon the most recent planning assumptions in force at the time of the determination.

Key assumptions are based on population and employment forecasts for the 306 transportation analysis zones (TAZs) over which the transportation network of the 2004-2025 RTP is defined (Map 1). This conformity analysis uses the most current projections of 2025 population and employment as prepared by LCOG, the agency designated by the State for coordinating population estimates across Lane County. To date, there has been no process for the MPO policy board or the LCOG Board to formally adopt population forecasts. The population projections within this document were prepared based on final county level forecasts received in May 2004 from the State Office of Economic Analysis and analyzed in August 2004. The employment projections were based on 2002-2012 county-level, employment sector forecasts received from the Oregon Employment Department in October 2003. The results, shown in Table 2, differ from the estimates in the prior conformity analysis made in June 2004 due to the change in the analysis area from the Eugene/Springfield Metro Area to the TMA area, and due to the finalized OEA population projections. The populations in Table 2 are from 3-6% lower than the prior estimates. Estimated employment is initially 2% higher (due to inclusion of Coburg employers), but by 2025 is 3% lower than the prior estimates.
Table 2: Population and Covered Employment within TMA Transportation Analysis Zones.
Estimated Vehicle Miles Traveled (VMT) for the TMA and the CATS area are also shown.

<table>
<thead>
<tr>
<th>Analysis Year</th>
<th>Population¹</th>
<th>Employment</th>
<th>Vehicle Miles Traveled²</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>TMA³</td>
<td>CATS</td>
</tr>
<tr>
<td>2002</td>
<td>232,730</td>
<td>117,340</td>
<td>2,666,839</td>
</tr>
<tr>
<td>2007</td>
<td>244,420</td>
<td>125,750</td>
<td>200,165</td>
</tr>
<tr>
<td>2015</td>
<td>266,975</td>
<td>139,730</td>
<td></td>
</tr>
<tr>
<td>2025</td>
<td>303,550</td>
<td>159,350</td>
<td>3,565,294</td>
</tr>
</tbody>
</table>

¹ Includes group quarters; ² Excludes commercial vehicles; ³ Internal trips only

For each analysis year, travel demand was estimated and trips were distributed across the road network based on land use and transportation changes. The base year for this analysis was 2002, the year for which land use data, population and employment data, and traffic counts at the extended cordon stations were all available. The acknowledged Eugene-Springfield Metropolitan Area General Plan was used to describe land use within the Eugene-Springfield urban growth boundary. (The Metro Plan is currently in periodic review; an updated plan was adopted by the cities but is under appeal, and was consequently not used for this analysis. The appeal is expected to be resolved in 2005.) Metropolitan housing and employment growth was restricted to within the Eugene-Springfield urban growth boundary. Coburg’s visioning plan for 2025 was used to guide growth in the vicinity of Coburg (as approved by the Coburg City Council). Allocations were made to transportation analysis zones using the updated land use allocation model (LUAM). Allocations reflect local development, redevelopment, and infill plans for mixed-use nodes, known projects currently in the planning process, and the availability of vacant, buildable land by current plan designation.

The link speeds within the transportation network model reflect travel under congested conditions and are a function of both travel and capacity limitations of the road system for each analysis year.

Estimated vehicle miles traveled (VMT) are shown in Table 1. VMT are estimated to increase by 10.5% within the CATS area over the period 2002 to 2025, a significantly slower rate than the 33.7% increase estimated for internal trips within the TMA over the same period. This contrast reflects the increasing size of the TMA and the trip productions and attractions from development of housing and employment centers outside the central business district of Eugene.

The RTP contains a policy of reducing vehicle trips by 10% in mixed use nodal development areas based on the State Transportation Planning Rule (OAR 660-012-0060 (5)(a)). Eugene and Springfield staff reviewed the planned nodes within each city and indicated which ones are expected to generate this reduction by 2025. Thus, VMT estimated in this analysis will be higher than would be expected if all nodes were fully developed by 2025. Map 5 shows the planned nodal areas and those for which vehicle trip reductions were assumed.
Map 5. Nodal Development Areas within the TMA.
Nodes are identified as to whether a 10% vehicle trip reduction was assumed or not.
The inset shows the details in the CATS area.
The transportation model including transit assumptions and policies was calibrated for 2002. With three exceptions (outlined in the next paragraph), transit operating policies are assumed to remain unchanged from the 2001-2021 RTP. Transit operations continue with approximately the same service hours. Non-BRT buses are assumed to continue to operate in mixed traffic. Dwell time is assumed to be 1 minute/mile on standard bus routes; 0.5 minutes/mile on BRT routes for which stops are not yet located; and 0.2 minutes/stop on the Phase 1 (Franklin Blvd.) BRT route. Basic fares are assumed to remain constant with inflation while automobile operating costs are assumed to increase by 33%: real fuel prices are assumed to increase from $1.50 in 2002 to $2.50 by 2025, while average vehicle fuel economy increases from 20 to 30 mpg.

Three transit operating polices were changed from those in the 2001-2021 RTP. First, Bus Rapid Transit (BRT) Phase 1 is assumed to be operational by 2006. Portions of the entire BRT system are in place by 2025, but only 4 additional corridors are assumed to be fully developed with separate guideways. The remaining BRT corridors are assumed to have intersection priority treatments, but would otherwise operate in mixed traffic mode. Second, by 2025, all major employers with more than 150 employees in 2002 are assumed to provide group passes to their workers, resulting in a slight reduction in the average fare in travel zones with large employers. (Note that in 2002, employers with a minimum of 10 employees became eligible for enrollment in the LTD Commuter Solutions group pass program). In other zones, fares are assumed to remain constant with inflation. (Cash fare prices are in fact unchanged since FY02 at an adult fare of $1.25; fare discounts on 3 month passes (estimated at 37%) and some wholesale discount changes became effective July 1, 2004). Third, perceived parking costs (actual costs adjusted by employer payments) in downtown Eugene are assumed to continue to outstrip inflation based on the observed increase from 1995 to 2004 of 50% above inflation. Parking costs are assumed to undergo an additional 50% increase between 2002 and 2025. The paid-parking area of the downtown / university district is assumed to expand into the adjoining courthouse district.

Transit ridership is forecast to increase from 24,400/average weekday in 2002 to 41,000/day in 2025, an average rate of 2.2% per year. Service boundaries are assumed to remain constant and have, in fact, not changed since 2001.

LTD reports that, since July 2001, ridership has decreased by 6.2 percent, although it was down by only 1 percent in FY2003-2004 and is showing signs of increasing in the first quarter of FY2004-2005. This ridership decrease has been fueled by a reduction in bus service hours of 13 percent since June 2001. Bus operations are primarily funded by a payroll tax, which LTD expects to stabilize as the economic recovery continues. This should allow bus service hours to be maintained in FY2005-2006, as reflected in the LTD Board adopted 2004-2005 Capital Improvement Program, 2003 Strategic Plan, and Long Range Financial Plan.

Under LTD’s proposed FY04-05 budget, total revenues are expected to increase by 8.8% over that of FY01-02. Fare revenue growth is expected to level out at 4% per year following implementation of BRT phase 1.
These transit policy assumptions are considered reasonable by LTD staff.

There are no road and bridge tolls in the Eugene-Springfield Metro Area and none are expected in the future.

No transportation control measures (TCMs) are required by the Eugene-Springfield CO SIP.


The conformity determination must be based on the latest emission estimation model available. This requirement is satisfied if the conformity analysis uses the most current version of the motor vehicle emissions model specified by EPA. This model is MOBILE 6 (Version 6.2.03).

The emissions calculations for this conformity determination were performed using factors derived from MOBILE 6.2.03. For more details, see section 2.3 below.

**OAR 340-252-0130 and 40 CFR 93.112: Consultation**

The Central Lane MPO must make conformity determinations according to the interagency consultation procedures in OAR 340-252-0060, and according to the public involvement procedures established in OAR 340-252-0060 and 23 CFR Part 450.

On September 23, 2004, the Transportation Planning Committee (TPC) met with the MPO to discuss the conformity determination. A 30-day comment period is required for review of the draft conformity determination by the standing committee under OAR 340-252-0060(2)(b)(G). In accordance with this requirement a draft document was provided to TPC on November 2, 2004, with the comment period extending to December 8, 2004. On November 23, 2004, TPC recommended that MPC adopt the proposed conformity determination at their meeting on December 9, 2004.

In addition to distribution to TPC, copies of the draft document were provided to air quality specialists at FHWA, FTA, EPA, ODOT and LRAPA, in compliance with requirements for interagency consultation. On October 6, 2004, representatives from FHWA, FTA, EPA, ODOT, LRAPA and Central Lane MPO reviewed the process and parameters to be used in the emissions analysis. A review of the analysis and the draft conformity document by this group was held on November 9, 2004.

Common practice of the MPO is to provide the public with at least 30 days for comment. (More formal requirements of the MPO are awaiting completion of the Public Involvement Plan which will be finalized once the Citizen Advisory Committee is appointed). The preliminary draft conformity determination was made available to the public on November 4, with a complete draft available on November 8, 31 days prior to the final decision. On October 22, 2004, a postcard was mailed announcing the update of the RTP, MTIP and conformity determination, and the holding of two open houses on
November 4 and December 1 (Appendix H). On October 31, 2004, the Central Lane MPO placed a display advertisement in the Eugene Register-Guard advertising the open houses. Also, on October 31, a legal notice was placed in the Register-Guard announcing the opening of the public comment period, the availability of the preliminary draft documents on the LCOG web-site (http://www.CentralLaneMPO.org), and the public hearing on December 9, 2004 (see Appendix H).

No substantive comments on the conformity determination were received during the public comment period or at the public hearing.

A summary of the relevant public involvement and interagency consultation dates associated with this conformity determination is provided in the Table 3.
Table 3. Summary Schedule for Public Outreach and Consultation

<table>
<thead>
<tr>
<th>Date</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>October 9, 2003</td>
<td>MPC adopts FY04-06 MTIP</td>
</tr>
<tr>
<td>June 14, 2004</td>
<td>MPC adopts FY04-06 MTIP conformity determination</td>
</tr>
<tr>
<td>July 20, 2004</td>
<td>USDOT approves conformity determination for FY04-06 MTIP</td>
</tr>
<tr>
<td>October 6, 2004</td>
<td>Interagency consultation with air quality partners.</td>
</tr>
<tr>
<td>October 14, 2004</td>
<td>Public hearing on RTP at MPC meeting; Public comment period opens on RTP.</td>
</tr>
<tr>
<td>October 22, 2004</td>
<td>Postcard mailed announcing update of RTP and Conformity Determination, and two open houses on November 4 and December 1.</td>
</tr>
<tr>
<td>October 31, 2004</td>
<td>Announcement of public review period and public hearing for conformity determination and RTP published in Eugene Register Guard legal notices.</td>
</tr>
<tr>
<td></td>
<td>Display Ad published in Register Guard, noticing public workshops on November 4 and December 1.</td>
</tr>
<tr>
<td>November 2, 2004</td>
<td>Preliminary draft conformity document distributed to TPC for comment and review.</td>
</tr>
<tr>
<td>November 4, 2004</td>
<td>TPC approves release of conformity determination document for public comment.</td>
</tr>
<tr>
<td></td>
<td>Preliminary draft conformity document posted to MPO website</td>
</tr>
<tr>
<td></td>
<td>Public review period opens on conformity determination</td>
</tr>
<tr>
<td></td>
<td>Public workshop for RTP and conformity determination</td>
</tr>
<tr>
<td>November 8, 2004</td>
<td>Complete draft conformity determination distributed to TPC and made available on MPO website for public access.</td>
</tr>
<tr>
<td>November 9, 2004</td>
<td>Interagency consultation with air quality partners.</td>
</tr>
<tr>
<td>November 18, 2004</td>
<td>MPC holds public hearing on RTP</td>
</tr>
<tr>
<td>November 23, 2004</td>
<td>TPC recommends approval of RTP and MTIP conformity</td>
</tr>
<tr>
<td>December 1, 2004</td>
<td>Public workshop for RTP and conformity determination</td>
</tr>
<tr>
<td>December 9, 2004</td>
<td>Public Hearing on RTP and conformity determination. Public comment period closes. MPC takes action to adopt conformity determination and RTP.</td>
</tr>
<tr>
<td>December 9, 2004</td>
<td>Adopting resolutions distributed to TPC, FHWA, FTA, EPA, ODOT, and LRAPA.</td>
</tr>
</tbody>
</table>
**OAR 340-252-0140 and 40 CFR 93.113: Timely Implementation of TCMs**

There are no TCM requirements in the CO SIP.

**OAR 340-252-0150 and 40 CFR 93.114: Currently conforming transportation plan and TIP**

The prior RTP was last amended and conformed on July 20, 2004 (see USDOT letter included in Appendix A). The current FY04-06 TIP was simultaneously conformed on July 20, 2004 (see Appendix A).

**OAR 340-252-0160 and 40 CFR 93.115: Projects from a Plan and TIP**

The projects included in the RTP are of two categories: those that are Federally funded and/or regionally significant and are normally included in the modeling of the MPO’s transportation network, and those that are included because of potential eligibility for Federal funding at some time in the future. Projects in the MTIP are either drawn from the RTP, or, are consistent with the policies and purpose of the plan and will not interfere with other projects specifically within the plan. Appendix B identifies, for each project in the MTIP, the project ID from the RTP or the consistent policy. Typically, MTIP projects not in the RTP are pavement rehabilitation/resurfacing projects.

As projects in the RTP and the MTIP are developed, the related emissions modeling fully accounts for their scope.


Since the Eugene-Springfield area has an approved CO SIP and is currently a maintenance area for CO, the motor vehicle budget test must be satisfied to demonstrate conformity. On May 5, 2004, EPA verbally and by email (see Appendix A) confirmed that the only motor vehicle budget specified in the CO SIP is that of 6,021 tons/yr for 1990. No specific budget was established in the SIP for the last year of the maintenance plan.

Consistency with the emissions budget must be demonstrated for the last year of the transportation plan’s forecast period and for any intermediate years as necessary so that the demonstrations of consistency are no more than 10 years apart. Four analysis years were chosen for the conformity determination

- 2002 (the base year; not required for analysis but included for reference),
- 2007 (a date within 5 years of the current year),
- 2015 (an intermediate date to ensure analyses are at least as frequent as 10 years),
- 2025 (the last year of the transportation plan’s forecast period)

These years were determined by interagency consultation to meet the requirements of this regulation.
The entire travel network was analyzed, and emissions computed for travel within the CATS area. All regionally significant projects contained in the RTP and MTIP were included in the analysis as were all regionally significant projects within the TMA.

The regional emissions analysis meets the requirements of OAR 340-252-0230 (equivalently 40 CFR 93.122), as described below in Section 2.3.

To demonstrate conformity, emissions must be less than or equal to the emissions budget established for the last year of the maintenance plan (no such budget exists in the SIP), and for the years in which a motor vehicle emissions budget is established (1990). Thus, emissions for all analysis years in this conformity determination must be less than or equal to the maintenance plan’s budget of 6,021 tons/yr for the CATS area.

As shown in Section 3.0, emissions for all analysis years are estimated to be less than the motor vehicle budget in the CO SIP, and the budget test is thus met.

2.3 Regional Emissions Analysis & Methodology

_Emissions Factors_

As required by OAR 340-252-0120 (equivalently, 40 CFR 93.111), the EPA-approved MOBILE 6.2.03 model was used to estimate emission factors. Environmental and program parameter values were provided to LCOG by LRAPA, the air pollution authority for Lane County. These included winter minimum and maximum temperatures, absolute humidity, and fuel Reid vapor pressure. There are no programs for mandated fuel mixes or vehicle inspection/maintenance in this area. LCOG staff used these local values to run the emissions model MOBILE 6.2.03 to compute air quality emissions per VMT by speed range and by facility type. These CO emission factors are listed in Appendix E-1 with sample input and output files shown in Appendices E-2 and E-3, respectively.

_VMT estimates_

The transportation model is a four-step model of trip generation, trip distribution, mode choice and vehicle assignment. The traffic forecasting software package, EMME/2 (Version 9.5), was used to determine traffic estimates and forecasts for the entire TMA region consistent with the estimated trips within the TAZs for each analysis year. Specific data obtained from the model included speed, volumes and vehicle miles traveled as well as facility types. A link-by-link analysis was carried out. Since roadway capacity and speed are included in the model, the effects of congestion are also included.
**Total Emissions**

In order to compute CO emissions per link MOBILE 6 emissions factors were applied to the estimates of vehicle miles traveled (VMT) by facility type for each analysis year. In addition to local roads explicitly included in the travel network, travel on local roads that are not represented by links in the network was also included through the application of emission factors to interzonal VMT (through centroid connectors), and intrazonal VMT (computed by a “nearest neighbor node” algorithm). CO emissions on the facilities within the CATS area were then totaled to estimate the CATS area-wide CO emissions in tons/year for each analysis year. The results are listed in Table 4, Section 3.0, below.

**Transportation Networks**

The tables in Appendices B and C list the fiscally constrained projects considered in this conformity determination. Maps 3 and 4 show their location within the region. Criteria for projects required to be included in the regional emissions analysis were derived from OAR 340-252-0270 and OAR 340-252-0280 (equivalently, 40 CFR 93.126 and 40 CFR 93.127) (Appendix G).


All regionally significant projects in the maintenance area (the CATS area) were included in the regional analysis as required by the conformity test. These included all non-exempt FHWA and FTA-funded capital projects proposed in the fiscally constrained transportation plan and the MTIP.

As a usual and continuing practice, all new facilities and all road projects that affect the capacity or speed of existing facilities are included for the appropriate year in the transportation networks developed and maintained at LCOG. Regionally significant projects outside the CATS area are thus included in this analysis. The 2007 network was comprised of the 2002 network plus road improvements completed or currently underway with completion dates prior to 2007, and all projects from the FY04-06 MTIP which are expected to be in operation by 2007. The 2015 network was that of the 2007 network plus the MTIP projects that were expected to be operational between 2008 and 2015. All roadway projects from the RTP that affected capacity or speed of travel were included in the fiscally constrained 2025 network.

LTD supplied LCOG with future year transit networks for 2025 which included BRT as well as other conventional transit routes. It is assumed that by 2025, five BRT corridors will be fully developed with separate guideways and priority treatment at intersections. The remaining corridors will be partially developed, with intersection priority treatment, but no guideways. Total dwell time in BRT corridors will be less than non-BRT routes due to automated fare collection, boarding through multiple doors, and limited stops. These effects influence travel demand, and are thus included through the mode choice component of the transportation system model.
Off-network roadways within the Eugene-Springfield planning area consist of local roads that are not explicitly included in the transportation network as links. Interzonal travel is included by computation of VMT on centroid connectors. Intrazonal distances used in VMT calculations are assumed to be 7/10ths of the distance to the nearest neighboring zone. All centroid connector and intrazonal travel is assumed to take place on local streets, and thus MOBILE 6 emissions factors for local streets are used in computing the emissions effects of travel on these streets. Through trips and trips having an origin or destination outside the Eugene-Springfield region are represented within the model based on a cordon origin and destination survey and a modeled growth rate. All through trips that traverse the CATS area are included in the VMT and emissions summaries.

No emissions reduction credits are included in the analysis.

The ambient temperatures used for the regional emissions analysis are consistent with those used to establish the emissions budget in the CO SIP.

**OAR 340-252-0270 and 40 CFR 93.126: Exempt Projects**

Air quality neutral projects within the financially constrained plan are exempt from the requirement that a conformity determination be made (see Appendix F). These projects are defined by EPA as projects which will not affect the outcome of any area-wide air quality analysis. Although these projects are exempt from emissions analysis, the system-wide traffic-forecasting model reflects all capital investment projects, including those designated as exempt, to the extent possible (e.g. in approach capacities and link speeds) in the assignment of traffic and calculation of VMT.

Projects designated as exempt from the requirement to determine conformity included planning and technical studies including preparation of environmental impact statements, pavement resurfacing, lighting improvements, pedestrian facilities, construction of passenger shelters, and purchase of operating equipment.

The lists of projects in Appendices B and C were reviewed during interagency consultation.

**OAR 340-252-0280 and 40 CFR 93.127: Projects Exempt from Regional Emissions Analyses**

While certain highway and transit projects are exempt from regional emissions analysis requirements (Appendix G), it is LCOG-practice that the system-wide traffic-forecasting model reflect these projects to the extent possible (e.g. in approach capacities and link speeds) in the assignment of traffic and calculation of VMT.

The lists of projects in Appendices B and C were reviewed during interagency consultation.

The status of all completed projects has been included in the emissions analysis: signal progressions have been taken into consideration by developing intersection approach capacities on the links. No new synchronization projects have been completed since the last conformity determination of June 2004, and none are known to be scheduled for future implementation.
3.0 Results of Emissions Modeling

As described above in response to OAR 340-252-0190 (and equivalently, 40 CFR 93.118), estimated emissions for all analysis years must be no greater than the 1990 motor vehicle budget of 6,021 tons/yr.

Table 4 presents the results of the regional emissions analysis. Projected emissions are shown to be less than 6,021 tons/yr, and thus the 2004-2025 RTP and the FY04-06 MTIP are shown to be consistent with the motor vehicle budget in the CO SIP and to meet the budget test.

Table 4: Carbon Monoxide Emissions Analysis within the CATS boundary

<table>
<thead>
<tr>
<th>Analysis Year</th>
<th>Tons/Year of Carbon Monoxide</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SIP motor vehicle budget</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>1990</td>
<td>6,021*</td>
</tr>
<tr>
<td>2002</td>
<td>2,033</td>
</tr>
<tr>
<td>2007</td>
<td>1,336</td>
</tr>
<tr>
<td>2015</td>
<td>981</td>
</tr>
<tr>
<td>2025</td>
<td>891</td>
</tr>
</tbody>
</table>


These results are about 9% lower in 2002 and 15% lower in 2025 than the results obtained in the prior conformity analysis of June 2004. The recalibration of the travel model with the updated population and housing data, employment information, and transit information, resulted in a 9% lower emissions estimate for 2002. Reduced population and employment estimates and a change in the parking costs in downtown Eugene resulted in a 15% lower emissions estimate for 2025 than that estimated in the prior analysis for this forecast year.

As shown in Figure 1, CO levels in the maintenance area have continued to decline since 1990. In 2003, the second highest CO level recorded was 3.3 ppm. The observed trends in the data and the modeled results thus engender confidence that the policies and projects in the RTP and MTIP will not endanger the NAAQS for CO in the Eugene-Springfield maintenance area.