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June 25, 2008

File Number 3000400

TO: San Diego Region Conformity Working Group
FROM: Rachel Kennedy
SUBJECT: Cancellation of July 2, 2008, Meeting

MEMBER AGENCIES

- Cities of
- Carlsbad
- Chula Vista
- Coronado
- Del Mar
- El Cajon
- Encinitas
- Escondido
- Imperial Beach
- La Mesa
- Lemon Grove
- National City
- Oceanside
- Poway
- San Diego
- San Marcos
- Santee
- Solana Beach
- Vista
- and
- County of San Diego

The San Diego Region Conformity Working Group (CWG) meeting scheduled for July 2, 2008, has been cancelled. The next meeting of the CWG is scheduled for August 6, 2008. Attached is the meeting summary from June 4, 2008.

On June 20, 2008, the SANDAG Transportation Committee released the Draft 2008 Regional Transportation Improvement Program including its air quality conformity analysis and the draft air quality conformity redetermination for the 2030 Revenue Constrained Regional Transportation Plan: Pathways for the Future for public review and comment. CWG members are encouraged to review the draft documents available at www.sandag.org/2008RTIP, and submit any comments prior to the close of the public comment period on July 18, 2008.

Please contact me at (619) 699-1929 or by e-mail at rke@sandag.org, if you have any questions.

RKE/dsn

Attachment: Meeting Summary of June 4, 2008

ADVISORY MEMBERS

- Imperial County
- California Department of Transportation
- Metropolitan Transit System
- North San Diego County Transit Development Board
- United States Department of Defense
- San Diego Unified Port District
- San Diego County Water Authority
- Mexico

San Diego Association of Governments

CONFORMITY WORKING GROUP

June 25, 2008

Action Requested: INFORMATION

SUMMARY OF JUNE 4, 2008, MEETING

File Number 3000400

Item #1: Introductions

Self-introductions were made. See attached attendance list.

Item #2: Summary of May 7, 2008, Meeting

No comments were made.

Item #3: Public Comments/Communications

There were none.

Item #4: 2008 Regional Transportation Improvement Program (RTIP) Draft Air Quality Conformity Analysis

Rachel Kennedy, SANDAG, reviewed Appendix C of the draft Conformity Air Quality Analysis. A copy of this document was provided to CWG members. The San Diego region attained the federal One-Hour Ozone Standard in 2001. The U.S. Environmental Protection Agency (EPA) redesignated the San Diego air basin as attainment/maintenance and approved the One-Hour Ozone Maintenance Plan as a State Implementation Plan (SIP) revision, effective on July 28, 2003. On June 15, 2005, the U.S. EPA revoked the federal One-Hour Ozone Standard after the Eight-Hour Ozone Standard became applicable. Carl Selnick suggested that the language Ms. Kennedy clarifies is that the Eight-Hour Ozone Standard became applicable for conformity on June 15, 2005.

On April 15, 2004, the U.S. EPA designated the San Diego air basin as non-attainment for the new Eight-Hour Ozone Standard. This designation took effect on June 15, 2004. The air basin has been classified as a basic non-attainment area under Subpart 1 of the Clean Air Act and the attainment date for the Eight-Hour Ozone Standard is June 15, 2009.

In cooperation with the San Diego Air Pollution Control District (APCD) and SANDAG, the California Air Resources Board (CARB) developed an Eight-Hour Ozone Attainment Plan, which was submitted to the U.S. EPA by June 15, 2007. The budgets in the *Eight-Hour Ozone Attainment Plan for San Diego County* were found adequate for transportation conformity purposes by the U.S. EPA, effective June 9, 2008.

John Kelly, U.S. EPA, stated that the 2009 attainment date is not certain, due to the fact that San Diego is a Subpart 1 area and the U.S. EPA is in the process of reclassifying Subpart 1 areas. As a result, the Eight-Hour Ozone attainment date of 2009 may change. San Diego will likely be moderate under the new classification, which would utilize 2001-2003 data. Mr. Kelly will provide SANDAG with text that summarizes this new information.

Elisa Arias, SANDAG, asked Mr. Kelly when the reclassification would take place. Mr. Kelly stated that the new rule will be proposed in the next few months and the final rule will be out in mid-2009. The due date for the area's attainment demonstration will most likely be required by the end of 2009.

Mr. Kelly asked SANDAG about the expected ramifications of the new rule for the RTP and the budget. Ms. Kennedy explained that SANDAG will adopt the next RTP in 2011. Carl Selnick, APCD, clarified that SANDAG will have to do a 2009 budget as a moderate area, so they will most likely do a 2011 analysis for the RTP using a 2009 budget.

Ms. Kennedy then reviewed the Carbon Monoxide (CO) standards. The San Diego region was designated by the U.S. EPA as a federal maintenance area for the CO standard. On November 8, 2004, the CARB submitted the 2004 revision to the California SIP for CO to the U.S. EPA. Effective January 30, 2006, the U.S. EPA has approved this maintenance plan as a SIP revision.

The 2008 RTIP is consistent with the 2030 RTP: Pathways for the Future. As a financially constrained plan, the 2008 RTIP only contains those major transportation projects listed in the revenue constrained 2030 RTP. Conformity of the 2030 RTP expires on December 10, 2011. However, to comply with the Transportation Conformity Rule standards, which require a redetermination of conformity within two years of new budgets, SANDAG is redetermining conformity of the 2030 RTP: Pathways for the Future in conjunction with the 2008 RTIP.

Growth Forecasts

The 2030 Regional Growth Forecast Update is based solely on the adopted general plans and community plans and policies of the 18 cities. For the unincorporated area, the forecast is based on the most recent (June 2005) version of San Diego County's General Plan 2020 update, as directed by the Board of Supervisors.

In February 2008, SANDAG consulted with the CWG on the use of the 2030 Regional Growth Forecast Update for the air quality conformity analysis for the 2008 RTIP and 2030 RTP redetermination. Previously, both U.S. DOT and U.S. EPA concurred that approved plans should be used as input to the air quality conformity process.

Transportation Modeling

SANDAG follows a widely used, four-step transportation modeling process of trip generation, trip distribution, mode choice, and assignment to forecast travel activity in the San Diego region. After a first pass through the four steps, a final pass is made through the mode choice and assignment steps to reflect congested travel conditions in mode decision making. Travel model results are then combined with additional post-process input and output functions to form the complete modeling chain.

The estimates of regional transportation-related emissions analysis meet the requirements established in the Transportation Conformity Rule, Sections 93.122(b) and 93.122(c).

On February 6, 2008, SANDAG staff conducted interagency consultation on the growth forecasts and transportation modeling practices to be used in the conformity analysis for the 2008 RTIP and redetermination of the 2030 RTP.

Emissions Modeling

In November 2006, CARB released Emission FACTors (EMFAC) 2007, an emissions inventory model that calculates emissions for motor vehicles operating in California. It is an integrated model that combines emission rate data with vehicle activity to calculate regional emissions. The U.S. EPA approved EMFAC 2007 for use in conformity determinations on January 18, 2008.

The air quality analysis of the 2008 RTIP and 2030 RTP was conducted using EMFAC 2007's Burden mode. Projections of daily regional emissions were prepared for reactive organic gases (ROG), nitrogen oxides (NOx), and CO.

Regional transportation forecasts were initiated in April 2008. Output from the TransCAD model was then reformatted and adjusted to be useful for emissions modeling.

Eight-Hour Ozone Standard

Effective June 9, 2008, the U.S. EPA found the Eight-Hour Ozone budgets included in the Eight-Hour Ozone Attainment Plan for San Diego County adequate for transportation conformity purposes. In May 2008, SANDAG prepared countywide forecasts of average weekday ROG and NOx emissions for 2008, 2010, 2020, and 2030 using the EMFAC 2007 model. ROG and NOx emissions are based on the summer season.

The analysis years were selected to comply with Sections 93.106(a) (1) and 93.118 (a) of the Transportation Conformity Rule. According to these sections, the first horizon year (2010) must be within ten years from the base year used to validate the regional transportation model (2004), the last horizon year must be the last year of the transportation plan's forecast period (2030), and the horizon years may be no more than ten years apart (2020).

The Board will be asked to make a finding of conformity for the years 2008, 2010, 2020, and 2030 using EMFAC 2007. This emissions model was approved by the U.S. EPA for use in conformity findings on January 18, 2008.

CO Standard

CO regional emissions were projected for 2010, 2018, 2020, and 2030 for the conformity determination of the 2030 RTP. CO emissions are based on the winter season. SANDAG interpolates the 2018 emissions for CO.

Emissions Modeling Results

To determine conformity of the 2008 RTIP and 2030 RTP, the plan must comply with the emission analysis described in the Regional Emissions Forecast section.

Table C.2 on page C-11 of the draft Conformity Air Quality Analysis demonstrates that the modeling meets the emissions standards for ROG and NOx. Table C.3 on page C-11 shows that projected CO emissions from the 2008 RTIP and 2030 RTP are below the 2003 CO budget of 730 tons per day. Adjustment factors were provided by CARB to account for recently adopted emission control programs not reflected in EMFAC 2007 and other corrections. Table C.4 on page C-12 includes the adjustment factors by analysis year.

Exempt Projects

Section 93.126 of the Transportation Conformity Rule exempts certain highway and transit projects from the requirement to determine conformity. The categories of exempt projects include safety, mass transit, air quality (ridesharing and bicycle and pedestrian facilities), and others (such as planning studies).

Table C.5 of the draft Conformity Air Quality Analysis illustrates the exempt projects considered in the 2008 RTIP and 2030 Revenue Constrained RTP. Additional unidentified projects could be funded with revenues expected to be available from the continuation of existing state and federal programs. There are a number of bicycle and pedestrian improvement exempt projects.

John Kelly mentioned a new house resolution (HR 6049) that proposes to provide a \$20 per month pre-tax subsidy for bike commuters. This will be allowed, but not required, for all employers.

Implementation of Transportation Control Measures

There are four federally approved Transportation Control Measures (TCM) that must be implemented in San Diego, which the SIP refers to as Transportation Tactics. They include ridesharing, transit service improvements, traffic flow improvements, and bicycle facilities and programs.

These TCMs were established in the 1982 SIP, which identified general objectives and implementing actions for each tactic. The TCMs have been fully implemented. Ridesharing, transit, bicycling, and traffic flow improvements continue to be funded, although the level of implementation established in the SIP has been surpassed. No TCMs have been removed or substituted from the One-Hour Ozone Maintenance Plan, which is the applicable SIP. The list of actions that implemented the TCMs is available at SANDAG.

Interagency Consultation Process and Public Input

The consultation process followed to prepare the air quality conformity analysis for the 2008 RTIP and 2030 RTP redetermination complies with the San Diego Transportation Conformity Procedures adopted in July 1998. In turn, these procedures comply with federal requirements under 40 CFR 93. Interagency consultation involves SANDAG (as the MPO for San Diego County), the APCD, Caltrans, CARB, U.S. DOT, and U.S. EPA.

Consultation is a three-tier process that:

1. formulates and reviews drafts through a conformity working group;
2. provides local agencies and the public with opportunities for input through existing regional advisory committees and workshops; and
3. seeks comments from affected federal and state agencies through participation in the development of draft documents and circulation of supporting materials prior to formal adoption.

SANDAG consulted on the development of the air quality conformity analysis of the 2008 RTIP and 2030 RTP conformity redetermination at meetings of the CWG, as follows:

- On February 6, 2008, SANDAG staff presented the schedule for the preparation of the 2008 RTIP and its conformity analysis. Staff also presented information on the 2030 Regional Growth Forecast Update and Transportation Control Measures.
- On April 2, 2008, SANDAG consulted the CWG on the conformity criteria and procedures to be followed to determine conformity of the 2008 RTIP including the latest emissions model, emissions budgets and interim emissions analysis, and public involvement and outreach.
- On May 7, 2008, SANDAG staff presented information on the Revenue Constrained financial assumptions and stated that the CWG would be receiving the 2008 RTIP exempt projects by e-mail for interagency consultation. Staff distributed the list of exempt projects to the CWG on May 9, 2008. Additional exempt projects were distributed to the CWG on May 13, 2008, via e-mail. Additionally, staff confirmed that a redetermination of conformity would be done for the 2030 RTP, in conjunction with the 2008 RTIP in order to provide consistency with the new Eight-Hour Ozone budgets.

Sookyung Kim, SANDAG, received comments from Mike Brady and Sandy Johnson, Caltrans, regarding the exempt projects. Both Mr. Brady and Ms. Johnson recommended using different categories. Ms. Kim addressed the comments and made changes to categories where necessary. There were several projects that were changed from non-capacity increasing to capacity increasing. Ms. Kim forwarded an e-mail to CWG members describing all changes to the exempt projects. Ms. Kennedy highlighted future key dates for the 2008 RTIP and 2030 RTP air quality conformity redetermination:

- On June 2, 2008, SANDAG released the draft air quality conformity analysis of the 2008 RTIP and 2030 RTP to the San Diego Region CWG for a review-and-comment period. On June 4, 2008, the draft air quality analysis was discussed at the meeting of the San Diego Region CWG. Applicable comments submitted will be incorporated into the final report.
- On June 20, 2008, the draft 2008 RTIP and its conformity determination and the 2030 RTP conformity redetermination will be released for public review.
- On July 18, 2008, a public hearing on the draft 2008 RTIP and its conformity determination and the 2030 RTP conformity redetermination will be held.

- The SANDAG Board will be asked to approve the 2008 RTIP and its conformity determination and the 2030 RTP conformity redetermination at its July 25, 2008, meeting.

Ms. Kennedy reminded members that this analysis is still in draft format. CWG members may submit additional comments via e-mail or letter.

Sookyung Kim, SANDAG, asked Kathy Gomez, Caltrans, and Wade Hobbs, FHWA, to review the exempt project list and confirm that the project information provided suffices their requirements.

Item #5: Eight-Hour Ozone Attainment Plan for San Diego County Status Update

Ms. Kennedy informed the CWG that on May 23, 2008, the Notice of Adequacy for the Eight-Hour Ozone budgets was published in the Federal Register. These budgets are to be used for future transportation conformity determinations effective June 9, 2008. Ms. Kennedy thanked John Kelly and Karina O'Connor, U.S. EPA, for their assistance with getting the new budgets through the federal process quickly.

Item #6: Other Business

Rachel Kennedy announced that the next statewide Conformity Working Group meeting would be held on November 13, 2008, in Fresno.

Ms. Kennedy closed the meeting after reminding members that the next Conformity Working Group Meeting will be held on July 2, 2008, from 10:30 a.m. to 12 noon at SANDAG.

San Diego Region Conformity Working Group

Meeting Attendance

June 4, 2008

| Name | Agency |
|-----------------------|---------------|
| Carl Selnick | APCD |
| Dennis Wade (phone) | CARB |
| Mike Brady (phone) | Caltrans |
| Rafael Ambrosi | Caltrans |
| Cathy Gomez (phone) | Caltrans |
| Sandy Johnson | Caltrans |
| John Kelly (phone) | EPA |
| Wade Hobbs (phone) | FHWA |
| Michael Morris | FHWA |
| Elisa Arias | SANDAG |
| Rachel Kennedy | SANDAG |
| Sookyung Kim (phone) | SANDAG |
| Antoinette Meier | SANDAG |
| Carla Walecka (phone) | TCA |