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September 28, 2011

File Number 3100600

TO: San Diego Region Conformity Working Group
 FROM: Andrea Hoff, Regional Planner
 SUBJECT: Cancellation of the October 5, 2011, San Diego Region Conformity Working Group Meeting

MEMBER AGENCIES

- Cities of
- Carlsbad
- Chula Vista
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- Del Mar
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- Encinitas
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ADVISORY MEMBERS

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- San Diego Unified Port District
- San Diego County Water Authority
- Southern California Tribal Chairmen's Association
- Mexico

The San Diego Region Conformity Working Group (CWG) meeting originally scheduled for **October 5, 2011**, has been cancelled. The next meeting of the CWG is scheduled for **November 2, 2011**, at 10:30 a.m.

Attached is the meeting summary from August 3, 2011, for your information.

On October 7, 2011, an information item regarding the proposed adoption schedule for the 2050 Regional Transportation Plan (RTP) will be presented to the Transportation Committee. In addition, the Transportation Committee will be asked to recommend approval of the Regional Transportation Improvement Program (RTIP) Amendment No. 13 to the Board of Directors.

On October 28, 2011, the SANDAG Board of Directors will be asked to certify the Final 2050 RTP Environmental Impact Report, make a finding that the 2050 RTP Revenue Constrained Plan is in conformance with the State Implementation Plan for air quality, and adopt the air quality conformity determination and the Final 2050 RTP, including its Sustainable Communities Strategy. The Board also will be asked to make a determination of conformity for the 2010 RTIP Amendment No. 13 for consistency purposes.

Please contact me at (619) 699-1983 or by e-mail at ahof@sandag.org if you have any questions.

AHOF/dda

Attachment: Meeting Summary of August 3, 2011

San Diego Association of Governments
SAN DIEGO CONFORMITY WORKING GROUP

September 28, 2011

Action Requested: INFORMATION

SUMMARY OF AUGUST 3, 2011, MEETING

File Number 3100600

Item #1: Introductions

Self-introductions were made. See attached attendance list.

Item #2: Summary of May 4, 2011, Meeting

Elisa Arias, SANDAG, asked the Conformity Working Group (CWG) to review the meeting summary. No corrections were made.

Item #3: Public Comments/Communications

No public comments were made.

Item #4: 2050 Regional Transportation Plan (RTP): Revised Draft Air Quality Planning and Transportation Conformity Document

On July 26, 2011, the Revised Draft 2050 RTP Air Quality Conformity document was released to the CWG for a 30-day comment period that will end August 26, 2011. Ms. Arias said that comments regarding this document could be made during the CWG meeting or submitted to SANDAG staff before the deadline. On August 1, 2011, a public notice was posted to the SANDAG Web site about the release of the Revised Draft 2050 RTP Air Quality Conformity document to the general public. Subsequently, public notices were published in the North County Times and the Union Tribune, the two largest circulation newspapers in the region. The comment period for the general public will close on August 31, 2011.

Ms. Arias gave an overview of the Revised Draft 2050 RTP Air Quality Conformity document, which was included as an attachment to the meeting agenda.

Background

On April 15, 2004, the U.S. Environmental Protection Agency (EPA) designated the San Diego air basin as non-attainment for the 1997 Eight-Hour Ozone Standard. This designation took effect on June 15, 2004. The air basin initially was classified as a basic non-attainment area under Subpart 1 of the CAA, and the attainment date for the Eight-Hour Ozone Standard was set as June 15, 2009. However, the U.S. EPA, in response to a court decision, is expected to rule in 2011 that the San Diego basic non-attainment area be reclassified as a Subpart 2 Serious non-attainment area, with a maximum statutory attainment date of June 15, 2013. Final U.S. EPA action on this proposed reclassification has yet to be taken.

Several areas that are tribal lands in eastern San Diego County were excluded from the 1997 Eight-Hour Ozone Standard non-attainment designation.

The San Diego region also has been designated by the U.S. EPA as a federal maintenance area for the Carbon Monoxide (CO) Standard. On November 8, 2004, the ARB submitted the 2004 revision to the California State Implementation Plan (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.

Transportation Conformity Modeling Procedures

Background

SANDAG has developed the Revenue Constrained Scenario of the 2050 San Diego RTP to meet the required air quality conformity analysis. Conformity of the 2010 Regional Transportation Improvement Program (RTIP) Amendment No. 13 will be determined simultaneously for consistency purposes.

2050 RTP Air Quality Conformity Methodology

While the horizon year of this RTP is 2050, the current version of the emissions model approved by the U.S. EPA, EMISSION FACTORS (EMFAC) 2007 only contains emission factors to 2040. Because no other emissions model is approved for use in conformity determinations by metropolitan planning organizations (MPOs) in California, staff explored options under the Transportation Conformity Rule to conduct the air quality conformity determination for the 2050 RTP.

In concurrence with the approved methodology, SANDAG staff conducted the Air Quality Conformity Analysis for the 2050 RTP for 2011 through 2040, with the analysis years of 2018, 2020, 2030, and 2040. SANDAG conducted a regional emissions analysis (for information purposes only) for 2050. To perform the informational analysis for 2050, SANDAG used the 2050 travel data from the SANDAG transportation model as input into EMFAC 2007 for the last year of the EMFAC 2007 model (2040).

Growth Forecast

Ms. Arias said that the conformity document included information on the population, employment and housing forecast—which had been presented to the CWG in the past—showing a progression from the base year 2008 to the different analysis years 2020, 2030, 2040, and 2050.

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.

Motor Vehicle Emissions Modeling

Ms. Arias said that the emissions analysis presented in Table B.2 of the conformity document used EMFAC 2007, which was approved by the U.S. EPA for use in conformity determination. Ms. Arias said that for Eight-Hour Ozone, SANDAG staff ran the summer module of Burden and prepared the forecast of ROG and NOx emissions for 2018, 2020, 2030, 2040, and 2050 for informational

purposes. These analysis years comply with the conformity rule in terms of not being more than ten years apart and 10 years from our base year model, which is 2008.

As shown in Table B.2, all of SANDAG's emissions forecasts for ROG and NOx for all the analysis years are below the SIP emissions budgets for those pollutants. The adjustment factors for ROG and NOx are shown in Table B.3 of the conformity document.

Ms. Arias said that emissions relating to the CO standard are presented in Table B.4 of the conformity document. SANDAG staff ran the winter version of the Burden model for years 2018, 2020, 2030, 2040, and 2050 for informational purposes. As shown in Table B.4, the RTP would meet the emissions budgets that were allocated for CO in the last maintenance plan.

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 other (such as planning studies).

Table B.5 illustrates the exempt projects considered in the 2050 Revenue Constrained RTP. This table shows short-term exempt projects. Additional unidentified projects could be funded with revenues expected to be available from the continuation of existing state and federal programs.

Interagency Consultation Process and Public Input

Ms. Arias highlighted a few key milestones:

- On February 25, 2011, the Draft 2050 RTP Air Quality Conformity Analysis was released to the CWG for a 30-day review.
- At the March 2, 2011, CWG meeting, the Draft 2050 RTP Air Quality Conformity Analysis was discussed.
- On April 22, 2011, the SANDAG Board of Directors released the Draft 2050 RTP, including its air quality conformity analysis, for a public review period that closed on July 8.
- On July 26, 2011, the revised air quality conformity analysis document was released to the CWG for a 30-day review period.
- On August 1, the revised air quality conformity analysis document was released to the general public with public notices on SANDAG's website and in two newspapers in the San Diego Region.

Ms. Arias pointed out that the tables of projects, including capital improvements and phasing for transit, highway, and connector projects, as well as phasing of arterial projects, also were included as attachments to the agenda, and that those tables were going to be part of Appendix A of the Final 2050 RTP.

Ms. Arias said that the 2050 RTP and the 2010 RTIP amendment would meet the SIP budgets and the conformity requirements in the Clean Air Act.

Ilene Gallo, Caltrans, said that she did not notice what had changed in the revised conformity document. Ms. Arias highlighted the specific changes in the document, including minor changes in the phasing of projects, mainly the highway projects. She referred to Table 2 and said that there was a segment of the Interstate 805 (I-805) projects that was advanced from 2020 to 2018; the project that was previously shown in 2020 was broken up into 2020 and 2018. Another change related to the I-5 North Coast Corridor, which in the Draft 2050 RTP was coded as ten lanes plus four managed lanes, adding two general purpose lanes and four managed lanes for the project up to Palomar Airport Road. However, based on the Caltrans and Federal Highway Administration (FHWA) selection of a preferred alternative, the project was scaled back to eight lanes plus four general purpose lanes, meaning no extra general purpose lanes. Furthermore, on July 22, the SANDAG Board recommended advancing the implementation of the first phase of the Mid-City Light Rail Transit project from Mid-City to downtown San Diego, which was originally scheduled for the last decade of the Plan, and now has moved up to the 2035 analysis year. The SANDAG Board also recommended moving up two connector projects on I-5 and State Route 78 (SR 78). Additionally, based on comments from the public, SANDAG staff is recommending that the connector projects on the I-15 and SR 78 be moved up from the 2035 to the 2020 timeframe.

Ms. Arias said that SANDAG staff plans to bring these proposed changes to the SANDAG Transportation Committee and Board of Directors in September. Also, the final production of the document will continue and SANDAG staff expects the Board to consider the adoption of the plan at its October 28 meeting. Ms. Arias added that comments on the revised conformity document could be sent to her directly or to Andrea Hoff.

Item #5: Exemption Status for Rural Bridge Projects

Ms. Arias said that this item came up through consultation and basically relates to the replacement of bridges in rural areas that are one-lane bridges and that are being replaced with a two-lane bridge. There was some discussion among the CWG members as to whether this type of project was capacity increasing or not. After consultation with the U.S. EPA, the FHWA recently interpreted the replacement of one-lane bridges in rural areas with standard two-lane bridges as exempt from conformity. Projects considered exempt were those under Table 2 in the conformity rule as well as those that correct, improve, or eliminate a hazardous location or feature. Since a project with these characteristics was proposed in San Diego County for replacement, SANDAG staff conducted consultation with FHWA and the U.S. EPA, after which it was decided to consider the project as a safety project. Mike Brady from Caltrans sent an email to the Statewide Conformity Working Group confirming this action by FHWA.

John Kelly, U.S. EPA, said that in instances where it is not clear if a project is exempt or not, it is important to bring the project up for discussion among the CWG and make sure the group is in agreement. Ms. Arias said that an interagency consultation process is required for exempt projects, and therefore the CWG will have the opportunity to provide comments on exempt project lists. The specific requirements for the exemption for rural bridge projects are that the bridge must be replacing an existing one-lane bridge with a two-lane bridge and not include any added lanes on the approaches to the bridge. The project must also be located in a rural or non-urbanized area on a road that is not part of a regionally modeled network, which is the case of the project in question.

Wade Hobbs, FHWA, said that the project could be listed in the Transportation Improvement Program (TIP) under the current bridge listings or separated under a "safety-type" group listing. Project listings in the TIP are typically grouped according to the classifications provided in 49 CFR Table 2. Therefore, if it were decided to keep the exempt bridge projects in the existing bridge project listing, FHWA would ask that the group listing for the bridge projects indicate specifically which projects were exempt under the provision of the conformity regulation for bridge replacement/rehabilitation, and which projects were one- to two-lane bridge replacements that were safety improvements. The Bridge Program Office at Caltrans expressed concern about the ability of FHWA, FTA, EPA, and Caltrans to stay in accord when exemption decisions like these ones are made. During earlier discussions, the Bridge Program Office at Caltrans outlined some expectations with regard to how to deal with these projects; one suggestion was that the projects be listed separately, which would be a requirement for most non-exempt bridge replacement projects to avoid any confusion. In addition to agreeing that the interagency consultation process still applies to these projects and should be used, the FHWA's position is that if the state asks for specific programming requirements, such as that the projects be listed separately, that the Metropolitan Planning Organizations honor the state program's request.

Item #6: Eight-Hour Ozone Standard Re-classification Update

John Kelley, EPA, said that the Subpart 1 to Subpart 2 reclassification action includes a first-time classification of the San Diego ozone non-attainment area for the 1997 Ozone Standard. San Diego was designated non-attainment in 2004 and it was treated under Subpart 1 without a classification. After losing the South Coast law suit, EPA proposed to classify the area under Subpart 2 as "moderate" since that was the classification the area would have received under its 2001-2003 data used for designation, which is the same data that is used for classification. Since EPA's proposal, the "moderate" classification deadline has passed. After finalization of this action, the area will be "classified" for the first time for the 1997 Standard as "serious" with a 2013 attainment date. The action has been through the EPA interagency review with the Office of Management and Budget at the White House, and returned to EPA for signature by the Administrator. It is not clear exactly how long this process could take, but it is expected to be signed in August.

The ramifications of this action for the San Diego County Air Pollution Control District (APCD) are that APCD would be required to submit two State Implementation Plans (SIP) to EPA within a 12-month period that relate to a "serious" classification. One would be an attainment demonstration showing attainment by 2013. Another would be a Reasonably Available Control Technology (RACT) SIP showing that sources that are major under the serious 50 ton threshold have installed RACT, or if they have not, provide the RACT rules for those sources. The other program area that would be affected is the Title V Program, which has its own 12-month deadline for the permitting authority to give EPA a program revision when there is a change in status.

Ms. Arias asked if the rule would become effective immediately once it is signed. Mr. Kelley said that it would probably be effective 30 days after publication; as a result, there will probably be a 1.5-month lag time before the 12-month deadline takes effect.

Carl Selnick, APCD, said that if the San Diego area has clean air in 2011, the attainment demonstration and the contingency measures requirements would be suspended as long as the area continues to have clean air. In this case, APCD would submit the SIP without those sections, and it would only submit the Regional Air Quality Strategy (RAQS).

Mr. Kelley said that if there is a 12-month deadline for RAQS, and if before reaching the deadline a re-designation and maintenance request is submitted, a RAQS might not be required either.

Mr. Selnick said that an emissions budget will need to be part of either SIP. If the San Diego area has clean air in 2011, a 2011 attainment emissions budget would be established and a re-designation request and maintenance plan submitted. If the present year is not clean, an attainment demonstration must be submitted with a 2012 emissions budget. The San Diego area must show attainment by June of 2013, and to demonstrate attainment by that date it has to be demonstrated that 2012 was clean.

Mr. Kelley said that it is proposed that budget years be changed to the end of the same year as the attainment date.

Ms. Arias asked if this would give an additional year to attain.

Mr. Kelley said that this would give one more analysis year to show attainment.

Mike Brady, Caltrans, asked if EPA was proposing to change the secondary standards for NO₂ and SO₂ to be equal to the primary standards.

Mr. Kelley said that EPA is proposing that the secondary standard be equal to the primary and to retain the current secondary standard for NO₂, which equals the old 53 ppb annual amount. EPA also is proposing to create a new additional secondary standard, which would create a two-part secondary standard including the 53 ppb annual standard and a 100 ppb one-hour standard. He added that the current deadline for the final secondary standards to be signed is March 20, 2012.

Item #7: Other Business

Dennis Wade, ARB, said that the new version of EMFAC is weeks away from being released to the public. It is a comprehensive revision consisting of three parts called EMFAC 2011.

Ms. Arias asked if the software would have a 2035 horizon year and what the grace period would be to start using the software once it is approved by EPA.

Mr. Wade said that it will have a 2035 horizon year and that EPA has the ability to set that period anywhere from three to 24 months.

Mike Brady, Caltrans, said that his agency is working with EPA to set up a Southern California version of the PM hotspots training. There is no set date yet, but it is likely to happen in November.

Item #8: Next Meeting

Ms. Arias stated that the next meeting of the CWG is scheduled for Wednesday, September 7, 2011, from 10:30 a.m. to 12 noon at SANDAG. Meeting materials will be sent to the group in advance.

San Diego Region Conformity Working Group

Meeting Attendance

August 3, 2011

Name	Agency
Dennis Wade (phone)	ARB
Mike Brady (phone)	Caltrans
Ilene Gallo (phone)	Caltrans
John Kelley (phone)	EPA
Wade Hobbs (phone)	FHWA
Elisa Arias	SANDAG
Domingo Vigil	SANDAG
Carl Selnick (phone)	SDAPCD
Carla Walecka (phone)	TCA