

**2018-2021
STATEWIDE TRANSPORTATION IMPROVEMENT
PROGRAM**

**CURRENT STATUS ON AIR QUALITY CONFORMITY FOR 2018-2021 STIP
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PURPOSE

The purpose of this this memorandum is to summarize the current air quality conformity status of all the projects in nonattainment and maintenance areas which are included in the 2018-2021 State Transportation Improvement Program (STIP). There are five Metropolitan Planning Organization (MPO) areas in Oregon that are classified as maintenance areas. They include Portland, Salem-Keizer, Eugene-Springfield, Medford-Ashland and Grants Pass. There are four rural nonattainment and maintenance areas in Oregon which include Oakridge, Klamath Falls, La Grande and Lakeview. This memorandum shows that all projects in the 2018-2021 STIP will comply with the Oregon State Implementation Plan.

AIR QUALITY CONFORMITY

Air quality provisions of the Clean Air Act (CAA), as amended, and the 23 United States Code (U.S.C.), are intended to ensure that integrated transportation and air quality planning occurs in areas designated by US Environmental Protection Agency (EPA) as nonattainment or maintenance areas for criteria air pollutants. Conformity with the air quality State Implementation Plan (SIP) must be demonstrated for Regional Transportation Plans (RTP), Metropolitan and State Transportation Improvement Programs (MTIP/STIP) and amendments to those documents prior to adoption of the STIP.

Both metropolitan transportation plans (MTPs), metropolitan transportation improvement programs (MTIPs), and associated conformity determinations in nonattainment and maintenance areas must be updated every four years in these areas. However, conformity may still need to be determined more frequently than every four years, because an updated or amended transportation plan or MTIP still must conform before adoption. MPOs in attainment areas do not have air quality conformity responsibilities.

Oregon has a number of limited maintenance plans. For transportation conformity purposes, EPA would conclude that emissions in these areas need not be capped for the maintenance period and therefore a regional emissions analysis would not be required. While areas with maintenance plans approved under the limited maintenance plan option are not subject to the budget test, the areas remain subject to other transportation conformity requirements of 40 CFR part 93, subpart A.

The following paragraphs briefly review each area's conformity status starting with the MPO areas and then followed by the rural areas.

Portland/METRO Air Quality Maintenance Area

The Portland METRO area carbon monoxide (CO) maintenance plan ends on October 2, 2017, at which point they will be attainment for all standards, a regional emissions analysis is not required and they are no longer subject to conformity requirements, and the five year MTP update cycle will apply from the date of the most recent MPO MTP adoption.

The Portland METRO area is also designated as attainment for ozone but subject to anti-backsliding plan.

The United States Department of Transportation (USDOT) last made a conformity determination on METRO's 2014-2040 RTP and METRO's 2015-2018 MTIP on May 20, 2015.

On July 27, 2017, the Metro Council is scheduled to adopt the air quality conformity determination for the 2018-2021 MTIP.

METRO will submit AQCD of the 2018-2021 MTIP to USDOT after adoption on July 27, 2017.

Salem-Keizer Maintenance Area

The Salem-Keizer Area Transportation Study (SKATS) air quality boundary is designated as a limited maintenance area for CO. Areas under a limited maintenance plan are not required to demonstrate that their RTPs or MTIPs conform through a regional emissions analysis. The Salem-Keizer Area is designated as attainment for ozone but subject to anti-backsliding plan.

On June 28, 2016 the SKATS Policy Committee adopted the air quality conformity determination for the amended 2015-2035 RTP and amended the 2015-2035 MTIP. The USDOT made a conformity determination on the SKAT's amended 2015-2035 RTP and 2015-2020 MTIP on February 14, 2017.

The SKATS submitted the conformity demonstration for the 2018-2023 MTIP to USDOT on June 21, 2017.

Eugene/Springfield Maintenance Area

The Eugene/Springfield Air Quality Maintenance Area (AQMA) is designated as limited maintenance for particulate matter of less than 10 microns (PM₁₀) on June 10, 2013. The area was designated attainment for CO on February 4, 2014; therefore transportation conformity requirements for CO do not apply.

On May 4, 2017, the Central Lane Council of Governments (LCOG) policy board adopted the air quality conformity determination for PM₁₀ on the 2040 RTP and the 2018-2021 MTIP. LCOG submitted the conformity demonstration for the 2040 RTP and the 2018-2021 MTIP to USDOT on June 12, 2017. USDOT made a conformity determination on June 26th, 2017.

Medford Urban Growth Boundary (UGB) CO Maintenance Area Medford/Ashland Air Quality PM₁₀ Maintenance Area

The Medford UGB area is designated limited maintenance for CO. The Medford's AQMA is designated as maintenance for PM₁₀.

The Rogue Valley Council of Government's (RVCOG) policy committee adopted the 2017-2042 RTP on March 28, 2017 and the 2018-2021 MTIP on June 27, 2017. USDOT last made a conformity determination on the RVCOG 2017-2042 RTP on June 12, 2017.

The RVMPO submitted the conformity demonstration for the 2018-2021 MTIP to USDOT on July 7, 2017.

Grants Pass

The Grants Pass UGB area is designated a limited maintenance area for PM₁₀ and the central business district (CBD) is a limited maintenance area for CO.

The USDOT made a conformity determination on the MRMPO's 2015-2040 RTP and 2015-2018 MTIP on June 21, 2016. The MRMPO adopted the 2018-2021 MTIP and updated 2015-2040 RTP on March 16, 2017. The 2018-21 MTIP was readopted on June 15th, 2017.

The MRMPO submitted the conformity demonstration for the 2018-2021 MTIP to USDOT June 22, 2017.

Isolated Rural Nonattainment/Maintenance Areas

Under the Oregon State Transportation Conformity Rule (OAR 340-252-0060), ODOT is responsible for area-wide conformity determinations in the isolated rural nonattainment and maintenance areas as a part of the STIP project approval process.

Nonattainment or
Maintenance Area

Boundary

Oakridge	PM ₁₀ UGB; PM _{2.5} UGB + West Fir Expansion
Klamath Falls	PM ₁₀ and CO UGB; PM _{2.5} UGB + Expansion
Lakeview	PM ₁₀ UGB
La Grande	PM ₁₀ UGB

For the purpose of determining conformity with the PM₁₀, PM_{2.5} and CO SIPs, transportation actions are required to satisfy the applicable criteria and procedures in the State Conformity Rule (OAR 340-252) and the federal conformity rule (40 CFR Part 93). Conformity requirements for rural isolated areas differ from urban areas. Conformity determinations are only required for rural isolated areas when a project approval is required. Therefore, normal conformity frequency triggers do not apply in these rural areas. In these areas air quality conformity determinations are required prior to project right of way and construction approvals for regionally significant and non-exempt projects.

The draft 2018-2021 STIP has been reviewed to identify any regionally significant or non-exempt projects located in each of the rural nonattainment and maintenance areas. A listing of all projects for each rural area was verified by ODOT's region personnel. Based on the project descriptions, all projects listed were then identified with one of the following classifications: regionally significant, non-exempt, a Table 2 type project of the Transportation Conformity Rule (40 CFR 93.126 and 40 CFR 93.128), or a Table 3 type project of the rule (40 CFR 93.127).

Table 2 type projects of the rule are exempt from all conformity requirements. Table 3 type projects of the rule are exempt from regional emissions analysis requirements but may require a local hot spot analysis as part of the project level conformity process if federal approval is needed. Project level conformity for the Table 3 projects is addressed during the environmental phase of project development.

Following the approval of this conformity paper for the 2018-2021 STIP, any new rural projects added to the 2018-2021 STIP would be evaluated for conformity using the 2017 update to the FHWA-FTA-ODOT STIP Amendments Matrix. The matrix includes links to the nonattainment and maintenance area maps and lists of all the exempt projects (Table 2 and Table 3).

Congestion Mitigation for Air Quality (CMAQ) program funding will be obligated as projects are approved for financial authorization and developed. CMAQ projects in rural areas were not included in the 2018-2021 STIP. CMAQ projects are meant to reduce CO, PM₁₀, PM_{2.5} and Ozone and therefore the implementation of these projects will not negatively impact air quality.

Summaries for each of the rural nonattainment and maintenance areas follow.

Oakridge

The Oakridge UGB is classified as a nonattainment area for PM₁₀ and PM_{2.5}. The PM_{2.5} boundary includes Oakridge and the community of West Fir.

Currently there are projects identified in the 2018-2021 STIP within the Oakridge PM₁₀ and PM_{2.5} nonattainment areas that require compliance with the conformity rule. The STIP projects for Oakridge are shown in Table 1.

**TABLE 1
OAKRIDGE PM₁₀ & PM_{2.5} RURAL NONATTAINMENT AREA
2018-2021 STIP PROJECTS**

Key #	Project Name	Description	Year	Conformity Status
21004	LTD accessible services - Oakridge Diamond Express operations 2018	Service connects Oakridge and Westfir communities to the metro area and Amtrak.	2018	Exempt (Table 2) Mass transit – operating assistance to transit agencies.
21005	LTD accessible services - Oakridge Diamond Express operations 2019	Service connects Oakridge and Westfir communities to the metro area and Amtrak.	2019	Exempt (Table 2) Mass transit – operating assistance to transit agencies.
20990	Diamond Express vehicle replacement (LTD)	Service connects Oakridge and Westfir communities to the Eugene/Springfield metro area, and Amtrak. Current vehicle has failed and back-up vehicle is nearing 500 K miles.	2018	Exempt (Table 2) Mass transit - bus replacement
20985	LTD ride source preventive maintenance 2018	Programmed preventive maintenance for LTD owned metro fleet, plus Diamond Express (Oakridge/Eugene and other locations)	2018	Exempt (Table 2) Mass transit - maintenance
20986	LTD ride source preventive maintenance 2019	Programmed preventive maintenance for LTD owned metro fleet, plus Diamond Express (Oakridge/Eugene and other locations)	2019	Exempt (Table 2) Mass transit - maintenance
17177	Oakridge-Westfir ride center	Trail building, signing, informational kiosks and restrooms	2018-2021	Exempt (Table 2) Mass transit- information kiosk
16976	CMAQ Oakridge Allocation (2013)	Unknown	2018	N/A

Modeling is not required to demonstrate regional conformity. None of the projects in the 2018 – 2021 STIP within the Oakridge area are regionally significant; therefore, it is assumed that these projects are consistent with the SIP.

Klamath Falls

The Klamath Falls UGB is classified as a maintenance area for CO and PM₁₀. The PM_{2.5} boundary is classified as a nonattainment area and includes the Klamath Falls UGB and outlying areas of the city. The STIP projects for Klamath Falls are shown in Table 3.

**TABLE 3
KLAMATH FALLS CO AND PM₁₀ MAINTENANCE AREA (UGB) and
PM_{2.5} NONATTAINMENT AREA
2018-2021 STIP PROJECTS**

Key #	Project Name	Description	Year	Conformity Status
20256	OR66 at Delap Pit Road (Klamath Falls)	Safety improvements including road relocation and illumination	2021	Exempt (Table 2) Safety – Safety Improvement Program (IAC 7/17/17)
20103	OR39 at Esplanade (Klamath Falls)	Design shelf ready plans for traffic signal replacement.	2021	Exempt (Table 2) Safety - Traffic control devices
20029	OR39 at Washburn Way	New signal cabinet including rack and switch. fiber optic connection at Washburn way and OR39	2019	Exempt (Table 2) Safety - Traffic control devices
19261	Hwy39: South 6th Street Sidewalk Preservation	Replace sidewalks, approaches and deteriorated curbs where needed. Add 2 pedestrian crossings.	2018	Exempt (Table 2) Pedestrian facilities
19208	OR140: Buck Creek Bridge Replacement	Replace bridge #03853	2018	Exempt (Table 2) Safety - Replace existing bridge
18731	OR140: Brett way extension (Klamath Falls)	Safety intersection improvements and extension of Brett Way	2018	Exempt (Table 2) Safety improvement program (IAC 1/14/16)
18683	OR39: Klamath Falls/Lakeview Junction - Matney Road	Remove existing surfacing and overlay new asphalt, rumble strips, durable markings & extend sidewalk	2018	Exempt (Table 2) Safety - Pavement resurfacing.
18129	Lake Ewauna trail: Klamath Avenue-Spring Street	Construct a portion of a paved multi-use (bicycle & pedestrian) trail for year round use	2018	Exempt (Table 2) Bicycle and pedestrian facilities.

“OR140: Brett Way Extension Project” was considered exempt under 40 CFR 93.126 (Table 2) Safety Improvement Program through interagency discussion on January 14, 2016.

“OR66 at Delap Pit Road Project” was considered exempt under 40 CFR 93.126 (Table 2) Safety Improvement Program through interagency discussion on July 17, 2017.

Modeling is not required to demonstrate regional conformity. None of the projects in the 2018 – 2021 STIP within the Klamath Falls area are regionally significant; therefore, it is assumed that these projects are consistent with the SIP.

Lakeview

The Lakeview UGB area is classified as a maintenance area for PM₁₀. There are no projects in Lakeview UGB included in the 2018-2021 STIP. The conformity requirements of these new projects will be evaluated as they are added to the STIP. Table 4 is a placeholder for future STIP projects for Lakeview.

**TABLE 4
LAKEVIEW PM₁₀ RURAL MAINTENANCE AREA (UGB)
2018-2021 STIP PROJECTS**

Key #	Project Name	Description	Year	Conformity Status
	NO PROJECTS			

La Grande

The La Grande UGB area is classified as a maintenance area for PM₁₀. The STIP projects for La Grande are shown in Table 5.

**TABLE 5
LA GRANDE PM₁₀ MAINTENANCE AREA (UGB)
2018-2021 STIP PROJECTS**

Key #	Project Name	Description	Year	Conformity Status
20494	I-84: Grande Ronde River (2nd St) Undercrossing Bridge	Place overlap, replace bridge, new sidewalks	2021	EXEMPT (Table 2) Safety – reconstructing bridge
20525	Cove Avenue (La Grande) Safety Improvements	Signing, stop signs, pavement marking and stop ahead beacons		Exempt (Table 2) Safety
	CMAQ - La Grande (2015) allocation	Unknown		N/A

Modeling is not required to demonstrate regional conformity. None of the projects in the 2018 – 2021 STIP within the La Grande UGB are regionally significant; therefore, it is assumed that these projects are consistent with the SIP.