Transportation Conformity

Transportation conformity is required under the Federal Clean Air Act to ensure that federally-supported highway and transit project activities conform to the purpose of the State Implementation Plan (SIP). Conformity to the purpose of the SIP means that transportation activities will not cause new air quality violations, worsen existing violations, or delay timely attainment of the relevant National Ambient Air Quality Standards. Conformity applies to non-attainment and maintenance areas for the following transportation-related criteria pollutants: ozone, particulate matter (PM_{2.5} and PM₁₀), carbon monoxide (CO), and nitrogen dioxide (NO₂).

Under the U.S. DOT metropolitan planning regulations and EPA's transportation conformity regulations, the Draft Amendment No. 2 to the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) need to pass five tests: consistency with the adopted 2012–2035 RTP/SCS, regional emissions analysis, timely implementation of transportation control measures (TCMs), financial constraint, and interagency consultation and public involvement.

The findings of the conformity determination for the Draft Amendment No. 2 to the 2012–2035 RTP/SCS are presented below. Details of the regional emissions analysis follow the findings.

Conformity Findings

SCAG's transportation conformity findings for the Draft Amendment No. 2 to the 2012–2035 RTP/SCS are as follows:

- Consistency with 2012–2035 RTP/SCS Test
 Inclusion of the amended projects in the 2012–2035
 RTP/SCS would not change any other policies, programs or projects in the federally approved 2012–2035 RTP/SCS.
 - Finding: The Draft Amendment No. 2 to the 2012–2035 RTP/SCS are consistent with the federally approved 2012–2035 RTP/SCS as previously amended and meet all federal and state requirements and regulations.
- Regional Emissions Tests
 - Finding: The regional emissions analyses for the Draft Amendment No. 2 to the 2012–2035 RTP/SCS update the regional emissions analyses for the federally approved 2012–2035 RTP/SCS as previously amended and are identical to the regional emissions analyses for the Draft 2015 FTIP.
 - Finding: The Draft Amendment No. 2 to the 2012–2035 RTP/SCS regional emissions analysis for 1997 and 2006 PM_{2.5} and its precursors meet all applicable emission

- budget tests for all milestone, attainment, and planning horizon years in the South Coast Air Basin (SCAB).
- Finding: The Draft Amendment No. 2 to the 2012–2035 RTP/SCS regional emissions for 2008 ozone precursors meet all applicable emission budget tests for all milestone, attainment, and planning horizon years for the Morongo Band of Mission Indians (Morongo), Pechanga Band of Luiseno Mission Indians of the Pechanga Reservation (Pechanga), SCAB excluding Morongo and Pechanga, South Central Coast Air Basin ([SCCAB], Ventura County portion), Western Mojave Desert Air Basin ([MDAB], Los Angeles County Antelope Valley portion and San Bernardino County western portion of MDAB), and the Salton Sea Air Basin ([SSAB], Riverside County Coachella Valley and Imperial County portions).
- Finding: The Draft Amendment No. 2 to the 2012–2035
 RTP/SCS regional emissions for NO₂ meet all applicable

- emission budget tests for all milestone, attainment, and planning horizon years in the SCAB.
- Finding: The Draft Amendment No. 2 to the 2012–2035 RTP/SCS regional emissions for CO meet all applicable emission budget tests for all milestone, attainment, and planning horizon years in SCAB.
- Finding: The Draft Amendment No. 2 to the 2012–2035 RTP/SCS regional emissions for PM₁₀ and its precursors meet all applicable emission budget tests for all milestone, attainment, and planning horizon years in SCAB and the SSAB (Riverside County Coachella Valley portion).
- Finding: The Draft Amendment No. 2 to the 2012–2035 RTP/SCS regional emissions for PM₁₀ meet the interim emission test (build/no-build test) for all milestone, attainment and planning horizon years for the MDAB (San Bernardino County portion excluding Searles Valley portion) and Searles Valley portion of San Bernardino County) and for the SSAB (Imperial County portion).
- Finding: The Draft Amendment No. 2 to the 2012–2035 RTP/SCS regional emissions analysis for 2006 PM_{2.5} and its precursors meet the interim emission test (build/nobuild test) for all milestone, attainment and planning horizon years for the SSAB (urbanized area of Imperial County portion).

Timely Implementation of TCMs Test

The Draft Amendment No. 2 to the 2012–2035 RTP/SCS does not revise or otherwise alter the scope, schedule, funding priority, or implementation of any TCM.

 Finding: The TCM project categories listed in the 1994/1997/2003/2007/2012 Ozone SIPs for the SCAB area were given funding priority, are expected to be implemented on schedule, and, in the case of any

- delays, any obstacles to implementation have been or are being overcome.
- Finding: The TCM strategies listed in the 1994 (as amended in 1995) Ozone SIP for the SCCAB (Ventura County) were given funding priority, are expected to be implemented on schedule, and, in the case of any delays, any obstacles to implementation have been or are being overcome.

• Financial Constraint Test

Finding: All projects listed in the Draft Amendment No.
 2 to the 2012–2035 RTP/SCS are financially constrained for all fiscal years. Fiscal constraint is analyzed in the Fiscal Impact chapter of this report.

• Interagency Consultation and Public Involvement Test

• Finding: The Draft Amendment No. 2 to the 2012–2035 RTP/SCS comply with all federal requirements for interagency consultation and public involvement. The amendment was discussed at the Transportation Conformity Working Group (TCWG), which includes representatives from the federal, state, and local air quality and transportation agencies, on several occasions (September 24, 2013; January 28, 2014; and May 27, 2014). The draft conformity analysis is scheduled to be released for a 30-day public review by July 1, 2014 and two public hearings are scheduled to be held in July 2014 at the SCAG's Los Angeles office with video-conferencing available from the County Regional Offices. The Draft Amendment document will be posted on the SCAG website, noticed in numerous newspapers, and distributed to libraries throughout the region. All conformity-specific comments will be documented and responded to.

Regional Emissions Analysis

The following tables summarize the required regional emission analyses for each of the non-attainment and maintenance areas within SCAG's jurisdiction. For those areas which require budget tests, the emissions values in the tables below utilize the rounding convention used by California Air Resources Board to set the

budgets (i.e., any fraction rounded up to the nearest ton), and are the basis of the conformity findings for these areas. For paved road dust ($PM_{2.5}$ and PM_{10}), SCAG uses the approved AP-42 method with VMT by facility type for all applicable milestone, attainment and planning horizon years.

South Central Coast Air Basin - Ventura County Portion

Table 1. 2008 8-Hour Ozone (Summer Planning Emissions [tons/day])

| P | ollutant | 2014 | 2021 | 2030 | 2035 |
|-----|---------------|------|------|------|------|
| | Budget | 13 | 13 | 13 | 13 |
| ROG | Plan | 8 | 5 | 4 | 4 |
| | Budget – Plan | 5 | 8 | 9 | 9 |
| | Budget | 19 | 19 | 19 | 19 |
| NOx | Plan | 15 | 8 | 6 | 6 |
| | Budget – Plan | 4 | 11 | 13 | 13 |

South Coast Air Basin

Table 2. 2008 8-Hour Ozone (Summer Planning Emissions [tons/day])

| Po | ollutant | Nonattainment Area | 2014 | 2017 | 2018 | 2020 | 2021 | 2023 | 2032 | 2035 |
|-----|---------------|-------------------------------------|-------|--------------------|-------|-------|-------|-------|-------|-------|
| | Budget | SCAB | 136 | 119 | 119 | 108 | 108 | 99 | 99 | 99 |
| | | Morongo | 0.4 | 0.4 ^a | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 |
| | | Pechanga | 0.0 | 0.0 ^a | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| ROG | Plan | SCAB excluding Morongo and Pechanga | 129.3 | 104.9 ^a | 96.7 | 86.8 | 83.9 | 77.8 | 67.1 | 61.7 |
| | | Sum | 129.7 | 105.3 | 97.1 | 87.2 | 84.2 | 78.1 | 67.4 | 62.0 |
| | | SCAB | 130 | 106 | 98 | 88 | 85 | 79 | 68 | 63 |
| | Budget – Plan | | 6 | 13 | 21 | 20 | 23 | 20 | 31 | 36 |
| | Budget | SCAB | 277 | 224 | 224 | 185 | 185 | 140 | 140 | 140 |
| | | Morongo | 1.8 | 1.5 ^a | 1.5 | 1.3 | 1.2 | 1.0 | 1.0 | 1.0 |
| | | Pechanga | 0.0 | 0.0 ^a | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| NOx | Plan | SCAB excluding Morongo and Pechanga | 259.0 | 205.5 | 187.6 | 160.8 | 148.3 | 124.9 | 109.9 | 106.4 |
| | | Sum | 260.8 | 207.0 | 189.1 | 162.1 | 149.5 | 126.0 | 110.9 | 107.4 |
| | | SCAB | 261 | 208 | 190 | 163 | 150 | 126 | 111 | 108 |
| a | Budget – Plan | | 16 | 16 | 34 | 22 | 35 | 14 | 29 | 32 |

^a2017 interpolated between 2014 and 2018

Table 3. 1997 and 2006 PM_{2.5} (24-Hour Emissions [tons/day])

| P | ollutant | 2014 | 2020 | 2030 | 2035 |
|-------------------|---------------|------|------|------|------|
| | Budget | 132 | 132 | 132 | 132 |
| ROG | Plan | 127 | 85 | 68 | 61 |
| | Budget – Plan | 5 | 47 | 64 | 71 |
| | Budget | 290 | 290 | 290 | 290 |
| NOx | Plan | 282 | 175 | 121 | 115 |
| | Budget – Plan | 8 | 115 | 169 | 175 |
| | Budget | 35 | 35 | 35 | 35 |
| PM _{2.5} | Plan | 21 | 14 | 12 | 12 |
| | Budget – Plan | 14 | 21 | 23 | 23 |

Table 4. PM₁₀ (24-Hour Emissions [tons/day])

| Poll | lutant | 2014 | 2020 | 2030 | 2035 |
|-----------|-------------------|------|------|------|------|
| | Budget | 182 | 110 | 81 | 81 |
| ROG | Plan ^a | 127 | 80 | 54 | 47 |
| | Budget – Plan | 55 | 40 | 27 | 34 |
| | Budget | 372 | 180 | 116 | 116 |
| NOx | Plan ^a | 282 | 171 | 106 | 100 |
| | Budget – Plan | 90 | 9 | 10 | 16 |
| | Budget | 159 | 164 | 175 | 175 |
| PM_{10} | Plan | 83 | 85 | 93 | 94 |
| | Budget – Plan | 76 | 79 | 82 | 81 |

a Including baseline adjustments provided by ARB in May 2014.

Table 5. CO (Winter Emissions [tons/day])

| Pollutant | | 2015 | 2020 | 2030 | 2035 |
|-----------|---------------|-------|-------|-------|-------|
| | Budget | 2,137 | 2,137 | 2,137 | 2,137 |
| СО | Plan | 1,053 | 696 | 510 | 461 |
| | Budget – Plan | 1,804 | 1,441 | 1,627 | 1,676 |

Table 6. NO₂ (Winter Emissions [tons/day])

| Pollu | utant | 2014 | 2020 | 2030 | 2035 |
|-----------------|---------------|------|------|------|------|
| | Budget | 680 | 680 | 680 | 680 |
| NO ₂ | Plan | 277 | 172 | 118 | 113 |
| | Budget – Plan | 403 | 508 | 562 | 567 |

Western Mojave Desert Air Basin - Los Angeles County (Antelope Valley Portion) and San Bernardino County (Western Portion of MDAB)

Table 7. 2008 8-Hour Ozone (Summer Planning Emissions [tons/day])

| Pollutant | | 2014 | 2020 | 2027 | 2035 |
|-----------|---------------|------|------|------|------|
| | Budget | 22 | 22 | 22 | 22 |
| ROG | Plan | 9 | 6 | 6 | 6 |
| | Budget – Plan | 13 | 16 | 16 | 16 |
| | Budget | 77 | 77 | 77 | 77 |
| NOx | Plan | 29 | 19 | 16 | 18 |
| | Budget – Plan | 48 | 58 | 61 | 59 |

Mojave Desert Air Basin - San Bernardino County Portion Excluding Searles Valley

Table 8. PM10 (24-Hour Emissions [tons/day])

| Pollutant | | 2014 | 2020 | 2030 | 2035 |
|-----------|------------------|------|------|------|------|
| | No Build | 9.6 | 10.5 | 13.6 | 15.1 |
| PM_{10} | Build | 8.9 | 9.5 | 12.4 | 13.6 |
| | No Build – Build | 0.7 | 1.0 | 1.2 | 1.5 |

Mojave Desert Air Basin - Searles Valley portion of San Bernardino County

Table 9. PM10 (24-Hour Emissions [tons/day])

| Pollutant | | 2014 | 2020 | 2030 | 2035 |
|------------------|------------------|------|------|------|------|
| | No Build | 0.0 | 0.0 | 0.0 | 0.0 |
| PM ₁₀ | Build | 0.0 | 0.0 | 0.0 | 0.0 |
| | No Build – Build | 0.0 | 0.0 | 0.0 | 0.0 |

Salton Sea Air Basin - Riverside County Coachella Valley Portion

Table 10. 2008 8-Hour Ozone (Summer Planning Emissions [tons/day])

| Pol | lutant | 2014 | 2020 | 2027 | 2035 |
|-----|---------------|------|------|------|------|
| | Budget | 7 | 7 | 7 | 7 |
| ROG | Plan | 4 | 3 | 3 | 3 |
| | Budget – Plan | 3 | 4 | 4 | 4 |
| | Budget | 26 | 26 | 26 | 26 |
| NOx | Plan | 15 | 10 | 8 | 9 |
| | Budget – Plan | 11 | 16 | 18 | 17 |

Table 11. PM10 (24-Hour Emissions [tons/day])

| Poll | utant | 2014 | 2020 | 2030 | 2035 |
|------------------|---------------------|------|------|------|------|
| | Budget ^a | 10.9 | 10.9 | 10.9 | 10.9 |
| PM ₁₀ | Plan | 5.0 | 5.6 | 6.8 | 7.0 |
| | Budget – Plan | 5.9 | 5.3 | 4.1 | 3.9 |

^a Budget set to one decimal place by 2003 Coachella SIP.

Salton Sea Air Basin - Imperial County Portion

Table 12. 2008 Ozone (Summer Planning Emissions [tons/day])

| Poll | utant | 2015 | 2020 | 2030 | 2035 |
|------|---------------|------|------|------|------|
| _ | Budget | 7 | 7 | 7 | 7 |
| ROG | Plan | 3 | 3 | 3 | 3 |
| | Budget – Plan | 4 | 4 | 4 | 4 |
| | Budget | 17 | 17 | 17 | 17 |
| NOx | Plan | 9 | 7 | 7 | 7 |
| | Budget – Plan | 8 | 10 | 10 | 10 |

Table 13. 2006 PM2.5 (24-Hour Emissions [tons/day])

| Pollutant | | 2014 | 2020 | 2030 | 2035 |
|-------------------|------------------|------|------|------|------|
| NOx | No Build | 4.7 | 3.2 | 3.0 | 3.2 |
| | Build | 4.6 | 3.1 | 2.9 | 3.1 |
| | No Build – Build | 0.1 | 0.1 | 0.1 | 0.1 |
| PM _{2.5} | No Build | 0.2 | 0.2 | 0.3 | 0.3 |
| | Build | 0.2 | 0.2 | 0.3 | 0.3 |
| | No Build – Build | 0.0 | 0.0 | 0.0 | 0.0 |

Table 14. PM10 (24-HOUR Emissions [tons/day])

| Pollutant | | 2014 | 2020 | 2030 | 2035 |
|------------------|------------------|------|------|------|------|
| PM ₁₀ | No Build | 1.6 | 1.7 | 2.0 | 2.2 |
| | Build | 1.1 | 1.4 | 1.7 | 1.8 |
| | No Build – Build | 0.5 | 0.3 | 0.3 | 0.4 |