

Appendix G

Air Quality Conformity

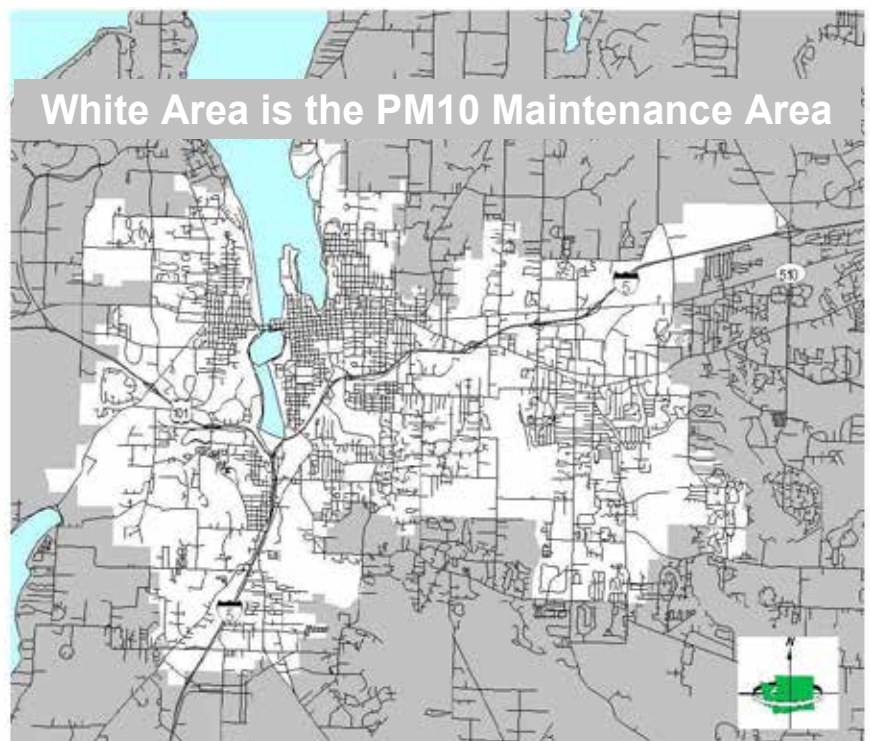
Appendix G documents that the *TRPC What Moves You 2045 Regional Transportation Plan* (RTP) achieves and maintains the National Ambient Air Quality Standards (NAAQS) as required by the Clean Air Act Amendments of 1990, and meets the requirements set forth in WAC 173-420 and the Thurston County Second 10-Year Limited Maintenance Plan for PM₁₀. The federal Clean Air Act, the Washington Clean Air Act, and the Fixing America's Surface Transportation (FAST) Act require this finding of conformity. Federal 40 CFR Part 93 and WAC 173-420 identify governing rules.

Specifically, the 2045 RTP does not:

- Cause or contribute to any new violation of the federal air quality standards for PM₁₀.
- Increase the frequency or severity of any existing violation of the standards.
- Delay timely attainment of the standards.

Air Quality Designation

The Thurston County maintenance area is approximately the 1987 city limits for Lacey, Olympia, and Tumwater. The Second 10-Year Limited Maintenance Plan for PM₁₀ was approved with an effective date of November 4, 2013. The PM₁₀ Maintenance Area Map identifies the part of the region to which the maintenance status applies.



The approved Second 10-Year Limited Maintenance Plan does not contain a transportation conformity emission budget, and regional emission analyses are no longer required as part of the transportation conformity demonstration for PM10. However, all other transportation conformity requirements of 40 CFR Part 93 Subpart A continue to apply, such as:

- Transportation plans and projects provide for timely implementation of SIP transportation control measures in accordance with 40 CFR 93.113.
- Transportation plans and projects comply with the fiscal constraint element per 40 CFR 93.108.
- The MPO's interagency consultation procedures meet applicable requirements of 40 CFR 93.105.
- Conformity of transportation plans is determined no less frequently than every four years, and conformity of plan amendments and transportation projects is demonstrated in accordance with the timing requirements specified in 40 CFR 93.104.
- The latest planning assumptions and emissions model are used as set forth in 40 CFR 93.110 and 40 CFR 93.111.
- Projects do not cause or contribute to any new localized PM10 violations in accordance with procedures specified in 40 CFR 93.123.

- Project sponsors and/or operators provide written commitments as specified in 40 CFR 93.125.

Latest Planning Assumptions and Documentation

As required by §93.110, this conformity determination is based on the latest planning assumptions. Population and employment forecasts used in the travel demand model were developed in 2017/2018. This represents the recently adopted region-wide land use forecasts. The most current travel demand model covers the time period from 2020 to 2045. The travel demand model reflects the most current projects of future travel demand and transit service levels.

Technical documentation may be found in:

- Population and Employment Forecast for Thurston County
- Travel Demand Model Assumptions and Methodologies (to be published)
- Highway Performance Monitoring System (WSDOT)

TRPC documents are also available by calling TRPC at (360)956-7575.

Consultation

TRPC confers regularly with the state's Air Quality Consultation Group. The group is comprised of representatives from the Environmental Protection Agency, the State Department of Ecology, the Federal Transit Administration, the Federal Highway Administration, and the Washington State Department of Transportation. The group also provides direction on how to comply with conformity requirements. The group reviews assumptions, methodologies, process, and findings before any project included in the RTP proceeds.

The Air Quality Conformity Finding is published in both the draft and final RTP. During the public comment period, TRPC publicizes and distributes the RTP broadly to encourage the widest possible opportunity for public comment. TRPC is scheduled to adopt the RTP on July 10, 2020 and expects that a conformity finding will be issued shortly thereafter by Federal Highway Administration and Federal Transit Administration. Any public comment received during the public comment period will be considered by the Technical Advisory Committee and the Transportation Policy Board before being presented to TRPC for final action.

Using Vehicle Miles Traveled (VMT) to Demonstrate Conformity

TRPC's approach to monitoring conformity is established in the maintenance plan. Conformity is based on analyzing VMT extracted from the metropolitan area travel demand model and comparing that to the Margin of Safety. The modeled annual VMT growth rate for the period of this plan is 1.19 percent (Table G-1). The Margin of Safety analysis was conducted for the Thurston County Second 10-Year Limited Maintenance Plan for PM10. It would take a sustained VMT growth rate of 6.3 percent per year to reach the Margin of Safety for on-road emissions and trigger conformity concerns. Such a rate of growth would require an extraordinarily large increase in population, vehicles, and traffic, triggering regional attention long before that growth rate was achieved.

Table G-1: Annual VMT Growth Rate of PM10 Maintenance Area

Period	Annual VMT Growth Rate
2020-2045	1.19%

Source: TRPC Transportation Model.

The assessment is based on projected VMT for all Regional Projects anticipated to be operational by the end of the forecast period as well as anticipated population and employment growth. These Regional Projects are all included in the 2045 Regional Transportation Plan. They are listed in Chapter 2 and detailed in Appendix L.

Findings

TRPC's regional transportation model provides average daily VMT data for the long-range planning horizon. Based on that data, the annual growth rates are well below the 6.3 percent Margin of Safety growth rate identified in the Thurston County Second 10-Year Limited Maintenance Plan for PM10 that would trigger conformity concerns.

Therefore, TRPC finds that the projects included in the 2045 RTP will not cause or contribute to any new violation of the federal air quality standards for PM10.

Statement of Conformity

The TRPC What Moves You 2045 Regional Transportation Plan achieves and maintains the NAAQS as required by the Clean Air Act Amendments of 1990, and meets the requirements set forth in WAC 173-420 and the Thurston County Second 10-Year Limited Maintenance Plan for PM10.