



The transportation conformity process is complex. The following FAQ's are intended to provide answers to the most common questions asked by transportation programmers and implementing agencies in the northeastern Illinois region. This document is divided into the following sections:

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Background Information

What is Conformity?

Northeastern Illinois does not attain national ambient air quality standards for certain pollutants. It is classified as a moderate non-attainment area for the 8-hour ozone standard, and a non-attainment area for the annual fine particulate matter (PM_{2.5}) standard. The region must implement a transportation program which will not delay timely attainment of the national standards.

As part of the transportation planning and programming process, CMAP staff evaluates the impact of proposed transportation activities on the region's air quality. This evaluation, called a conformity analysis, is submitted to the Federal Highway Administration for review before a long-range regional transportation plan or Transportation Improvement Program (TIP) or conformity TIP amendment is approved. The conformity analysis must demonstrate that the emissions resulting from the plan or TIP meet the requirements of (i.e., "conform to") the regulations governing air quality.

For more information: <http://www.cmap.illinois.gov/conformity-analysis>

How are individual projects conformed?

Unless they are subject to Hot Spot Analysis (see Background Information below), **projects are not individually conformed**. A project is said to be conformed if that project is included in the travel demand model, has funding for phases beyond Alternatives Analysis (AA) or Engineering 1 (E1), in the most recently adopted or amended Transportation Improvement Program (TIP), or is identified as a major capital project in GO TO 2040, the region's comprehensive plan.

What is the conformity analysis process?

The region's surface transportation system is analyzed in particular years between now and the end of GO TO 2040 (the "horizon year"). These years are called scenario years or analysis years. A project is included in a scenario year based on its completion year (the year in which it will be open for public use). Current scenario years are 2015, 2020, 2030 and 2040. The regional travel demand model is run using information based on the TIP and major capital projects completed by the scenario year. The resultant vehicle miles traveled (VMT) information is fed into US Environmental Protection Agency's emissions model, called MOVES. MOVES then estimates on-road emissions for each pollutant precursor or direct pollutant in each scenario year.



For ozone precursors (volatile organic compounds – VOC, and nitrogen oxides – NO_x), the resulting emissions estimates must fall below the applicable SIP budgets. Annual direct PM_{2.5} emissions and NO_x precursor emissions are combined with estimates from northwestern Indiana, which is also part of the nonattainment area. The combined direct PM_{2.5} and NO_x emissions must remain below emissions estimates for 2002, the baseline year. For further details, see the [Current Conformity Analysis](#) document on the Conformity Analysis [web page](#).

What is hot spot analysis?

Some individual transportation projects must be evaluated for local air quality impacts, commonly called a "hot spot analysis." Projects that are subject to hot spot analysis are called, "projects of air quality concern." For fine particulate matter, the project or facility involves significant levels of diesel vehicle traffic, or is identified in a PM_{2.5} or PM₁₀ State Implementation Plan as a localized air quality concern. The hot spot analysis is conducted by the agency implementing the project as part of the environmental assessment process. Results of hot spot analyses are reviewed by CMAP's Tier II Consultation Team, described later.

Highway projects are also reviewed for potential carbon monoxide hot spots, but none have been identified in recent years; this is largely due to improvements in engine technology and fuels.

What projects are subject to conformity analysis?

All federally-funded projects and regionally significant projects with Not Exempt work types must be modeled and included in the conformed TIP in order to receive federal funding. A list of all work types and their exempt status can be found on the [TIP Programmer Resources](#) web page. [Major capital projects](#) included in GO TO 2040 are conformed, regardless of funding status, due to their regional significance and scope. Projects included in the Unconstrained project list in GO TO 2040 cannot be conformed without a Plan amendment.

What is Consultation?

Interagency consultation is required under the transportation conformity rule, as described in 40 CFR 51.402. In the northeastern Illinois region, these procedures are addressed through the [Tier II Consultation](#) process. Decisions made through this interagency consultation process guide the MPO in making conformity determinations.

The Tier II Consultation team consists of representatives from CMAP, the Illinois Department of Transportation, the Regional Transportation Authority, the Illinois Environmental Protection Agency, the United States Environmental Protection Agency, the Federal Highway Administration and the Federal Transit Administration. The team meets as needed to discuss conformity issues that arise during the analysis process. These issues include making conformity determinations for projects that cannot be accurately represented in the travel demand model, reviewing hot-spot analyses prepared as part of a major environmental action such as an Environmental Impact Statement, accommodating Not Exempt projects for which the sponsor is seeking federal discretionary funding, and reviewing conformity analyses performed during regular semi-annual determinations. The team also meets to discuss ongoing air quality issues such as changes to the State Implementation Plan (SIP), changes to air quality and travel demand models, and appropriate model assumptions and inputs for the region.



Individual projects or groups of projects that have been determined to be conformed by the team are noted in the TIP database with a conformity status of "Consultation".

What are the requirements for having a project included in a conformity analysis?

In order to be conformed projects must have funding identified for Phase 2 Engineering, Right of Way, Construction or Implementation included in the active years (currently 2012 – 2015) of the TIP. Project location, description and scope (work types) must be defined and model information, including a completion year, must be provided in the database.

What is the process for making a conformity determination?

The process begins with the submittal of new projects or project changes via the TIP database. Projects are analyzed for conformity by CMAP staff and the results of the analysis are presented to the Transportation Committee. If satisfied with the results, the Transportation Committee will release the analysis results and associated TIP amendment for a minimum of 30 days public comment. Following the comment period, staff will present comments received and final analysis results to the Transportation Committee to seek a recommendation of approval. The Transportation Committee's recommendation is presented to the CMAP Board and MPO Policy Committee, which makes the final determination. Following the MPO determination, the Federal Highway Administration, in consultation with the Federal Transit Administration and US Environmental Protection Administration (in consultation with the Illinois Environmental Protection Agency), issue a letter of concurrence with the determination.

When do conformity determinations occur?

CMAP routinely makes conformity determinations twice per year, in March and October. In order to complete the analyses and receive public comment prior to a determination, TIP changes for projects to be included in the determination must be submitted in December (for March approval) and July (for October approval), prior to the dates published in the [Transportation Due Dates](#) posted on the [TIP Programmer Resources](#) web page.

Project Status

How are individual projects conformed?

Unless they are subject to Hot Spot Analysis (see Background Information below), **projects are not individually conformed**. A project is said to be conformed if that project is included in the travel demand model, has funding for phases beyond Alternatives Analysis (AA) or Engineering 1 (E1), in the most recently adopted or amended Transportation Improvement Program (TIP), or is identified as a major capital project in GO TO 2040, the region's comprehensive plan, including the long range transportation plan.

What kinds of projects require conformity?

The project details contained in the TIP database include Exempt Status. The possible values for this field are:



Exempt – Projects that do not require conformity. Changes to these projects are approved either immediately if they are only administrative modifications, or at the next Transportation Committee meeting for amendments.

Exempt Tested – Projects that do not require conformity, but are included in the travel demand model to better reflect the region's transportation network. Changes to these projects are approved either immediately if they are only administrative modifications, or at the next Transportation Committee meeting for amendments.

Not Exempt – Projects that must be included in the travel demand model and conformity analysis. Many changes to these projects are approved immediately or at the next Transportation Committee meeting, but some changes trigger a conformity analysis. In this case, the project is held until the next analysis is approved by the MPO Policy Committee.

Where can I find a project's conformity status?

The project details contained in the TIP database include Conformity Status. The values are defined as:

Conformed – Projects included in the model network that have undergone a conformity determination.

Not Conformed – Projects that have not undergone analysis and are being held for the next semi-annual conformity determination. These projects are typically new projects, or projects which have added Not Exempt work types via a TIP change. Projects with work types requiring conformity that do not have funding (other than AA/E1) within the first four years of the TIP also have this status, but will not be subjected to semi-annual analysis until funds are programmed for E2 or later phases.

To Be Conformed – Signal Interconnect projects that have not yet been included in the model, but can proceed with implementation.

Not Required – Projects that do not require conformity analysis based on work types.

Consultation – Projects that have been determined to be conformed through the Consultation process. The date of the consultation decision is shown in the Project Dates form in the TIP database.

What if the characteristics or status of my project change?

Changes to project location, description (design elements, such as number or width of lanes or number of parking spaces), scope (work types), schedule (completion year) and funding should be submitted as TIP changes. Changes which affect a project's conformity status will be held for the next semi-annual conformity determination. Changes which remove the requirements for a project to be conformed (for example removal of all Not Exempt work types) are also held until those projects are removed from the model. Full descriptions of changes that trigger a conformity hold are given below.



What if my project is not conformed?

Alternatives Analysis and Phase 1 Engineering can proceed prior to the project being conformed, however Design Approval cannot be granted on unconformed projects. Signal Interconnect projects can proceed with implementation prior to undergoing conformity analysis.

When does a project's conformed status expire?

Projects remain conformed by remaining in the travel demand model. As long as a project is making progress toward implementation and funding remains programmed within the TIP, projects will retain their status as conformed.

TIP Changes

What TIP changes trigger a conformity hold?

Changes to projects which affect the project's inclusion or coding in the travel demand model are held for conformity analysis. For projects with one or more Not Exempt or Exempt Tested work types, these changes include:

- Adding a new non-exempt project that has funding for phases other than Alternative Analysis (AA) or Phase 1 Engineering (E1) identified within the active years (currently 2012 – 2015) of the TIP
- Adding or deleting a Not Exempt work type;
- Significant changes to a project's location and/or limits;
- Addition or deletion of phases (other than AA or E1) from the active years of the TIP;
- Completion year changes which cross a scenario year (Current scenario years are 2015, 2020, 2030 and 2040);
- Changes to other model information, such as number of lanes or parking spaces;
- Removing all Not Exempt work types from a project; and
- Deleting a project with a conformity status of Conformed or Consultation.

What TIP changes can be made to conformed projects without triggering a conformity hold?

Changes to conformed projects that do not affect the travel demand model may be either Administration Modifications or TIP Amendments, according to the [TIP Change and Project Grouping Procedures](#), which are summarized in the [TIP Changes Quick Reference](#).

For projects with one or more Not Exempt or Exempt Tested work types, these changes include:

- Changing fund sources;
- Changing fiscal years within the active years of the TIP;
- Cost changes;
- Changing the completion year within the same scenario year (for example, projects completed from 2011 – 2015 are in the 2015 scenario year, therefore changing the completion year from 2014 to 2015 does not require conformity analysis);
- Minor changes to a project's location and/or limits (for example, adding a marked route number, or changing limits within the same network link);



- Changes to the project sponsor or contact;
- Adding or deleting Exempt or Exempt Tested work types;
- Adding a new project with only Alternative Analysis (AA) or Phase 1 Engineering (E1) identified within the active years (currently 2012 – 2015) of the TIP; and
- Deleting a project with a conformity status of Not Conformed or To Be Conformed.

If a project being held for conformity has other pending TIP changes, these changes will not be considered until the conformity hold is removed. Therefore, whenever possible these changes that do not affect conformity status should be made (and approved if necessary) prior to making changes for the semi-annual conformity analysis.

Semi-Annual Conformity Analysis

What actions occur during the semi-annual conformity analysis?

Previously conformed projects are removed from the model networks if:

- All Not Exempt and Exempt Tested work types are removed;
- All funding (except AA and E1) is removed from the active years of the TIP;
- The entire project is deleted from the TIP; or
- For Major Capital Projects, a plan update removes the project from the plan.

New projects are added to the model networks if:

- They have a conformity status of Not Conformed, and have funding for phases beyond E1 or AA in the active years of the TIP; or
- They have a conformity status To Be Conformed

The model networks are updated if:

- A project changes scenario years
- Project limits change
- Project scope changes

What should I expect to prepare for the semi-annual conformity analysis?

4-6 weeks prior to TIP Change Deadline:

- CMAP staff will review the database for projects on the Hold for Conformity list, will compare the model network to projects in the TIP and will prepare a list of projects that are being considered for removal from the model as a result of pending TIP changes.
- CMAP staff will send implementers a spreadsheet of all active TIP projects with Not Exempt and/or Exempt Tested work types that have no pending TIP changes for implementer review.

Before TIP Change Deadline:

- Programmers should make all TIP changes, based on review of the lists provided by CMAP: Location/Limits, Work Types, Completion Year, and Model Information
- Implementers should add any new projects with Not Exempt or Exempt Tested work types to the TIP database.



- Implementers should delete any projects no longer being pursued. If a project is being deferred, it may be left in the database, but with funding moved outside the years of the TIP.

What are some best practices for managing conformed projects in the TIP?

Changes to conformed projects should be avoided in between semi-annual conformity analyses whenever possible. TIP changes that do not trigger a conformity hold (see above) should be made no later than one meeting prior to the conformity cycle. Once a project is held for conformity, all changes, including modifications, are held until the conformity determination is made by the MPO Policy Committee.

Be aware of deadlines related to letting dates to be sure that all conformity amendments are approved in time. Projects targeting lettings in November, January, and March should be conformed in October (TIP changes due in July). Projects targeting lettings in April, June, August and September should be conformed in March (TIP changes due in December).

Be cautious when managing your fiscal constraint to not move all funding for active conformed projects out of the TIP. If that funding remains out of the TIP when semi-annual conformity analyses occur, the project will be removed from the model and will need to be re-conformed when the funds move back into the TIP. During the 6 month period that the project had a status of Not Conformed, federal processing may be affected, particularly the ability to receive design approval.

Acronyms

AA – Alternatives Analysis
CFR – Code of Federal Regulations
CMAP – Chicago Metropolitan Agency for Planning
E1/E2 – Phase 1 Engineering/Phase 2 Engineering
EIS – Environmental Impact Statement
FHWA – Federal Highway Administration
FTA – Federal Transit Administration
IDOT – Illinois Department of Transportation
IEPA – Illinois Environmental Protection Agency
MCP – Major Capital Project (identified in GO TO 2040)
PM_{2.5} – Fine Particulate Matter, a criteria air pollutant
MPO – Metropolitan Planning Organization
NO_x – Nitrogen Oxides (ozone and fine particulate pollution precursors)
O₃ – ozone, a criteria air pollutant
PM_{2.5} – fine particulate matter, a criteria air pollutant
ROW – Right of Way
RTA – Regional Transportation Authority
SIP – State Implementation Plan
STIP – State Transportation Improvement Program
TIP – Transportation Improvement Program
USEPA – United States Environmental Protection Agency
VMT – Vehicle Miles Traveled
VOC – volatile organic compounds (precursors to ozone)