



MEMORANDUM

To: Transportation Committee
From: CMAP Staff
Date: January 11, 2019
Re: Transportation Conformity Update

In August an overview of transportation conformity and how it applies to the CMAP region was presented to the Transportation Committee. Since that meeting work has begun to address the proposed change in the region’s nonattainment status for the 2008 National Ambient Air Quality Standards (NAAQS) from Moderate to Serious Nonattainment, including the development of a new State Implementation Plan (SIP) with new Motor Vehicle Emission Budgets (MVEB) by the Illinois Environmental Protection Agency (IEPA). Responses to various regulatory requirements and changes to model inputs have also occurred. Updates regarding these activities are provided below.

As a nonattainment area for Ozone, the CMAP region is subject to transportation conformity under the Clean Air Act of 1970. Both ON TO 2050 and the Transportation Improvement Program (TIP) must demonstrate that the region conforms to the NAAQS for Ozone. This is accomplished through travel demand and air quality modeling that demonstrates the region does not exceed the approved MVEB for the region contained in the IEPA SIP.

The CMAP region currently has to comply with three different Ozone Standards (1997, 2008, and 2015), measured in parts per million (PPM), each of which has different Ozone nonattainment classifications and nonattainment geographies:

<u>Year</u>	<u>Standard</u>	<u>Classification</u>
1997	.080 PPM	Moderate – Maintenance
2008	.075 PPM	Serious – Nonattainment*
2015	.070 PPM	Marginal – Nonattainment

* The official federal register notice will be published when EPA officials return from being furloughed.

Due to a failure to attain the 2008 Ozone NAAQS by December 31, 2018 the US EPA has begun the process of reclassifying the region to Serious – Nonattainment for the 2008 Standard. This is a very involved process that will require the IEPA to develop a new SIP, over about 12 months.

As part of the new SIP, the MVEB will need to be revisited and it's likely that the budgets CMAP currently uses in demonstrating conformity will be reduced, making it more difficult for the region to demonstrate conformity in the future. CMAP is working with our partners at IEPA and through the Tier II consultation process to develop a new MVEB. If new SIP requirements are proposed that will impact the region, those requirements will be addressed through the Tier II consultation process as needed.

At the August Transportation Committee meeting the federal register notice regarding Illinois's Failure To Submit State Implementation Plan Submittals for the 2008 Ozone NAAQS was discussed along with the implications that this finding could have on transportation planning in the region. While it has not yet been finalized by the US EPA, CMAP has been informed that the sanctions clock associated with this action will likely be stopped in mid-January after IEPA submits its 2008 Ozone NAAQS attainment demonstration.

Recently CMAP has updated its vehicle population file. The current file is significantly different than the previous file both in terms of the mix of vehicles and the number of vehicles. Due to the differences in data CMAP intends to work with the Illinois Secretary of State to better understand the data that they are providing CMAP.

Finally, a new Mobile Vehicle Emissions Simulator (MOVES) model will be released in the next year. Nonattainment areas are required to use the latest MOVES model. In prior years when the region has moved to a new MOVES model we have seen significant changes in model data requirements and emissions outputs. The MOVES model has a number of data inputs that can greatly impact emissions calculations.

Given the continued importance of transportation conformity to transportation planning and implementation, CMAP staff will continue to provide regular updates on issues impacting transportation conformity to the transportation committee.

ACTION REQUESTED: Discussion

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