

CONFORMITY DETERMINATION

**for Amendments to the 2035 Regional Transportation Plan Update and
2011-2014 Transportation Improvement Program,
and the 2013-2016 Transportation Improvement Program,
for the Houston-Galveston Transportation Management Area**

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9/10/2012

**HOUSTON-GALVESTON AREA COUNCIL
TRANSPORTATION DEPARTMENT**

Board Resolution



Resolution

NO. 2012-08

CERTIFYING THAT THE 2013-2016 TRANSPORTATION IMPROVEMENT PROGRAM AND THE AMENDMENTS TO THE 2011-2014 TRANSPORTATION IMPROVEMENT PROGRAM AND THE 2035 REGIONAL TRANSPORTATION PLAN UPDATE ARE IN CONFORMITY WITH THE CLEAN AIR ACT OF 1990, AS AMENDED, AND THE SAFE, ACCOUNTABLE, FLEXIBLE AND EFFICIENT TRANSPORTATION EQUITY ACT – A LEGACY FOR USERS OF 2005.

WHEREAS, it has become necessary to certify that the 2013-2016 Transportation Improvement Program and the amendments to the 2011-2014 Transportation Improvement Program and to the 2035 Regional Transportation Plan Update were found to be in conformity for VOC and NO_x motor vehicle emissions budgets contained in *Revisions to the State Implementation Plan for the Control of Ozone Air Pollution, Houston/Galveston/Brazoria Ozone Nonattainment Area*; and

WHEREAS, the 2011-2014 and the 2013-2016 Transportation Improvement Program and 2035 Regional Transportation Plan (RTP) Update have met the requirements set forth in the Conformity State Implementation Plan issued jointly by the U.S. Department of Transportation and the Environmental Protection Agency (EPA); and

WHEREAS, vehicle emissions estimates resulting from the implementation of the transportation facility and service improvements recommended in the 2011-2014 and the 2013-2016 Transportation Improvement Program and the 2035 Regional Transportation Plan Update provide for expeditious implementation of transportation control measures in its applicable implementation plan; and

WHEREAS, the 2011-2014 and the 2013-2016 Transportation Improvement Program and the 2035 Regional Transportation Plan Update contribute to annual emissions reductions consistent with Sections 182 (b)(1) and 187 (a)(7) of the Clean Air Act, as amended; and

WHEREAS, implementation of the transportation facilities and services recommended in the 2011-2014 and the 2013-2016 Transportation Improvement Program and the 2035 Regional Transportation Plan Update would result in lower total vehicle emissions than the 1990 base year emissions and the motor vehicles emissions budget (MVEB); and

ATTACHMENT #1

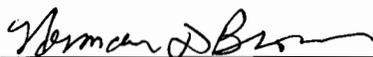
**TPC Agenda Item 6A
Mailout – 04/20/12**

NOW THEREFORE, be it resolved by the Transportation Policy Council for the Houston-Galveston Transportation Management Area that the 2011-2014 and the 2013-2016 Transportation Improvement Programs and the 2035 Regional Transportation Plan Update are in conformity with the 1990 U.S. Clean Air Act as amended, and the Safe Accountable Flexible and Efficient Transportation Equity Act – A Legacy for Users of 2005.

PASSED AND APPROVED this 27th day of April 2012 at a regularly scheduled meeting of the Transportation Policy Council for the Houston-Galveston Transportation Management Area.

APPROVED:

ATTEST:


for Ed Emmet, Chairman
Transportation Policy Council


Tom Reid, Secretary
Transportation Policy Council

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12	Project Listing
13	TCM Timely Implementation
14	Approval/Adequacy Findings of MVEBs
15	Interagency Conformity Consultation Committee
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List of Abbreviations

AERCO:	Area Emission Reduction Credit Organization
ALVW:	Adjusted Loaded Vehicle Weight
AQI:	Air Quality Index
AQM:	Air Quality Model
BA:	Baseline Activity
BACT:	Best Available Control Technology
BAP:	Bureau of Air Policy
BAQC:	Bureau of Air Quality Control
BART:	Best Available Retrofit Technology
BCCA:	Business Coalition for Clean Air
BER:	Baseline Emission Rate
BPA:	Beaumont/Port Arthur Ozone Nonattainment Area
CAA:	Clean Air Act of 1990
CAAA:	Clean Air Act Amendments of 1990
CARE:	Clean Air Responsibility Enterprise
CEM:	Continuous Emission Monitor
CMAQ:	Congestion Mitigation and Air Quality Improvement Program
CMSA:	Consolidated Metropolitan Statistical Area (the Houston-Galveston-Brazoria CMSA consists of the Houston PMSA [Chambers, Fort Bend, Harris, Liberty, Montgomery and Waller Counties], the Galveston-Texas City PMSA [Galveston County], and the Brazoria PMSA [Brazoria County]).
CNG:	Compressed Natural Gas
CO:	Carbon Monoxide
CO₂:	Carbon Dioxide
COAST:	Coastal Oxidant Assessment for Southeast Texas
COG:	Council of Governments
COPD:	Chronic Obstructive Pulmonary Disease
DERC:	Discrete Emission Reduction Credit
DFW:	Dallas/Fort Worth Ozone Nonattainment Area
EBTA:	Emissions Banking and Trading of Allowances (SB7)
EBTP:	Emissions Banking and Trading Program
EGF:	Electric Generating Facility
EPA:	Environmental Protection Agency

EPN:	Emission Point Number
ERC:	Emission Reduction Credit
ERP:	Emission Reduction Plan
ESAD:	Emission Specifications for Attainment Demonstration
ESL:	Effects Screening Level
ETR:	Employer Trip Reduction
FCAA:	Federal Clean Air Act
FCFF:	Federal Clean Fuel Fleet
FIN:	Facility Identification Number
FTA:	Federal Transit Administration
GHP:	Greater Houston Partnership
GHRCP:	Greater Houston Regional Clean Cities Program
GIS:	Geographic Information Systems
GVWR:	Gross Vehicle Weight Rating
HAP:	Hazardous Air Pollutant
HC:	Hydrocarbons
HCOEM:	Harris County Office of Emergency Management
HDDV2b:	Heavy-Duty Diesel Vehicles Class 2b (8,501-10,000 lbs. GVWR)
HDDV3:	Heavy-Duty Diesel Vehicles Class 3 (10,001-14,000 lbs. GVWR)
HDDV4:	Heavy-Duty Diesel Vehicles Class 4 (14,001-16,000 lbs. GVWR)
HDDV5:	Heavy-Duty Diesel Vehicles Class 5 (16,001-19,500 lbs. GVWR)
HDDV6:	Heavy-Duty Diesel Vehicles Class 6 (19,501-26,000 lbs. GVWR)
HDDV7:	Heavy-Duty Diesel Vehicles Class 7 (26,001-33,000 lbs. GVWR)
HDDV8a:	Heavy-Duty Diesel Vehicles Class 8a (33,001-60,000 lbs. GVWR)
HDDV8b:	Heavy-Duty Diesel Vehicles Class 8b (>60,000 lbs. GVWR)
HDDBS:	Heavy-Duty Diesel School Buses
HDDBT:	Heavy-Duty Diesel Transit and Urban Buses
HDGB:	Heavy-Duty Gasoline Buses (school, transit and urban)
HDGV2b:	Heavy-Duty Gasoline Vehicles Class 2b (8,501-10,000 lbs. GVWR)
HDGV3:	Heavy-Duty Gasoline Vehicles Class 3 (10,001-14,000 lbs. GVWR)
HDGV4:	Heavy-Duty Gasoline Vehicles Class 4 (14,001-16,000 lbs. GVWR)
HDGV5:	Heavy-Duty Gasoline Vehicles Class 5 (16,001-19,500 lbs. GVWR)
HDGV6:	Heavy-Duty Gasoline Vehicles Class 6 (19,501-26,000 lbs. GVWR)
HDGV7:	Heavy-Duty Gasoline Vehicles Class 7 (26,001-33,000 lbs. GVWR)
HDGV8a:	Heavy-Duty Gasoline Vehicles Class 8a (33,001-60,000 lbs. GVWR)
HDGV8b:	Heavy-Duty Gasoline Vehicles Class 8b (>60,000 lbs. GVWR)
HGA:	Houston/Galveston Ozone Nonattainment Area
H-GAC:	Houston-Galveston Area Council
HIRI:	Heat Island Reduction Initiative
HOV:	High-Occupancy Vehicle
HRM:	Houston Regional Monitoring Corporation
ILEV:	Inherently Low Emission Vehicle
I/M:	Inspection/Maintenance program (vehicle emissions control)
ISTEA:	Intermodal Surface Transportation Efficiency Act of 1991
LAER:	Lowest Achievable Emission Rate
LDDV:	Light-Duty Diesel Vehicles (passenger cars)
LDDT12:	Light-Duty Diesel Trucks 1 and 2 (0-6,000 lbs. GVWR)

LDDT34:	Light-Duty Diesel Trucks 3 and 4 (6,001-8,500 lbs. GVWR)
LDGV:	Light-Duty Gasoline Vehicles (passenger cars)
LDGT1:	Light-Duty Gasoline Trucks 1 (0-6,000 lbs. GVWR, 0-3,750 lbs. LVW)
LDGT2:	Light-Duty Gasoline Trucks 2 (0-6,000 lbs. GVWR, 3,751-5,750 lbs. LVW)
LDGT3:	Light-Duty Gasoline Trucks 3 (6,001-8,500 lbs. GVWR, 0-5,750 lbs. ALVW)
LDGT4:	Light-Duty Gasoline Trucks 4 (6,001-8,500 lbs. GVWR, 5,751 lbs. and greater ALVW)
LEV:	Low Emission Vehicle
LNG:	Liquefied Natural Gas
LOA:	Level of Activity
LPG:	Liquefied Propane Gas
LVW:	Loaded Vehicle Weight
MACT:	Maximum Achievable Control Technology
MAERT:	Maximum Allowable Emission Rate Table
MC:	Motorcycles (gasoline)
MDERC:	Mobile Discrete Emission Reduction Credit
MECT:	Mass Emission Cap and Trade
MERC:	Mobile Emission Reduction Credit
METRO:	Metropolitan Transit Authority of Harris County
MOA:	Memorandum of Agreement
MPO:	Metropolitan Planning Organization
MTBE:	Methyl Tertiary Butyl Ether
MTP:	Metropolitan Transportation Plan
MVEB:	Motor Vehicle Emissions Budget
µg:	Micrograms or 10 ⁻⁶ grams
NAAQS:	National Ambient Air Quality Standards
NAMS:	National Air Monitoring Stations
NESHAPs:	National Emission Standards for Hazardous Air Pollutants
NLEV:	National Low Emission Vehicle
NO₂:	Nitrogen Dioxide
NO_x:	Nitrogen Oxides
NSPS:	New Source Performance Standards
NSR:	New Source Review
NWS:	National Weather Service
O₂:	Oxygen
O₃:	Ozone
OTAG:	Ozone Transport Assessment Group
Pb:	Lead
PCC:	Program Compliance Credit
PM_{2.5}:	Particulate Matter less than 2.5 microns in size
PM₁₀:	Particulate Matter less than 10 microns in size
PMT:	Personal Miles Traveled
PPB:	Parts per Billion
PPM:	Parts per Million
PSD:	Prevention of Significant Deterioration
RACT:	Reasonably Available Control Technology
RAQPC:	Regional Air Quality Planning Committee

RCAP:	Regional Commute Alternatives Program
RFP:	Reasonable of Further Progress
ROP:	Rate of Progress
RFG:	Reformulated Gasoline
RTP:	Regional Transportation Plan
SA:	Strategic Activity
SER:	Strategic Emission Rate
SIP:	State Implementation Plan
SLAMS:	State or Local Air Monitoring Station
SO₂:	Sulfur Dioxide
SOCMI:	Synthetic Organic Chemistry Manufacturing Industry
SOV:	Single-Occupant Vehicle
SO_x:	Oxides of Sulfur
SULEV:	Super Ultra Low Emission Vehicle
SUV:	Sport Utility Vehicle
TAC:	Technical Advisory Committee
TAFF:	Texas Alternative Fuel Fleet Program
TCAA:	Texas Clean Air Act
TCEQ:	Texas Commission on Environmental Quality (formerly TNRCC)
TCMs:	Transportation Control Measures
TCP:	Transportation Control Plan
TDM:	Transportation Demand Management
TEA21:	Transportation Equity Act for the 21 st Century (replaces ISTEA)
TERP:	Texas Emission Reduction Plan
TIP:	Transportation Improvement Program
TMA:	Transportation Management Area
TMO:	Transportation Management Organization
TNRCC:	Texas Natural Resource Conservation Commission (now TCEQ)
TOG:	Total Organic Gases
TPC:	Transportation Policy Council
TPD:	Tons per Day
TPY:	Tons per Year
TxAQS 2000:	Texas 2000 Air Quality Study
TxDOT:	Texas Department of Transportation (formerly Texas Highway Department)
UAM:	Urban Airshed Model
ULEV:	Ultra Low Emission Vehicle
USDOT:	United States Department of Transportation
VMEP:	Voluntary Mobile Emission Reduction Program
VMT:	Vehicle Miles Traveled
VOC:	Volatile Organic Compound
ZEV:	Zero Emission Vehicle

Executive Summary

Milestones and Background

On January 25 and February 1, 2011 respectively, the Federal Highway Administration certified that the Houston- Galveston area's 2035 *Regional Transportation Plan (RTP) Update* and the 2011-2014 *Transportation Improvement Program (TIP)* conformed to the requirements of the State Implementation Plan for the Houston-Galveston ozone nonattainment area. The financial plan for the RTP Update reflected a significantly reduced revenue forecast for transportation plans and programs.

Currently, due to a short term availability of funds (Proposition 12), the Comprehensive Development Agreement authority to implement projects specified in the Senate Bill 1420, and other local requests, H-GAC is amending the 2035 Regional Transportation Plan Update and the Transportation Improvement Program, and as a consequence it has to update the Air Quality Conformity finding. In this way, some projects that were taken out of the plan due to lack of funding were put back, and some projects already in the plan were moved to different years based on sponsor request.

The major projects highlights¹ are the following:

2014 Analysis Year

- Fort Bend Parkway Extension (SH 6 to Sienna Pkwy) – New to RTP
- SH 99 Frontage Road (Morton To Peek Rd) – New to RTP

2017/2018 Analysis Years

- Cane Island/IH 10 W (Bridge over IH 10, Frontage Roads) – New to RTP
- BW 8 Widening (US 59 N to Old Humble Rd) – Restore to RTP
- FM 529 Widening (Fry Rd to Freeman/SH 99) – Advance
- FM 1488 Grade Separation (At UPRR) – Restore to RTP
- FM 1774 Grade Separation (At UPRR) – Restore to RTP
- FM 2978 Widening (Conroe Huffsmith to FM 1488) - Restore to RTP
- IH 45 N Managed Lanes/HOV (LP 336 to FM 1960) – Advance
- IH 610/US 290 Interchange (Project 'J-1') – Advance
- IH 10 W Aux Lanes (BW 8 to SH 6) – New to RTP
- SH 99 Segment I-2 (BS 146 to FM 1405) – Advance
- SH 99 Segment I-2 (Fisher Rd Overpass) – New to RTP
- SH 249 Tollway (Spring Cypress Rd to FM 1774/Pinehurst) – Restore to RTP
- SH 288 Tollway in Brazoria Co. (SH 6 to BW 8) – Advance

2025 Analysis Year

- METRO LRT, University Line – Delay
- METRO LRT, Uptown Line – Delay

- SH 99 Segments H/I-1 (US 59 N to IH 10 E) – Advance
- US 59 S Reconstruction/Widening (FM 2759 to SH 36) – Advance
- Westpark Toll Road Extension (SH 99 to Cross Creek Ranch) – Advance

2035 Analysis Year

- SH 146 Widening (Fairmont Pkwy to Red Bluff Rd) – Restore to RTP

¹ This list is not exhaustive of all project revisions that affect conformity. A complete listing of such revisions is contained within Appendix 18

This conformity finding will be using the Motor Vehicle Emission Budgets (MVEBs) coming from the latest revisions to the *Houston-Galveston-Brazoria Attainment Demonstration and Reasonable Further Progress State Implementation Plan for the 1997 Eight-Hour Ozone Standard* (hereafter referred to as the “AD and RFP SIPs”). The EPA found these MVEBs adequate on January 25, 2011 (effective by February 9, 2011).

Conformity Requirements

The Clean Air Act Amendments of 1990 (CAAA) require transportation plans, programs, and projects in nonattainment and maintenance areas, which are funded or approved by the FHWA or the Federal Transit Administration (FTA), to conform to the MVEBs established in the SIP. This ensures that transportation plans, programs, and projects do not produce new air quality violations, worsen existing violations, or delay timely attainment of the National Ambient Air Quality Standards (NAAQS). Conformity analysis requirements include:

- Use of the latest planning assumptions
- Analysis based on the latest emission estimation model available
- Interagency consultation, as well as a public involvement process, must be conducted during the analysis (found in Sections 7 and 8, respectively)
- Timely implementation of Transportation Control Measures (TCMs)
- An RTP and TIP that are consistent with the MVEBs established in the applicable SIP (if there is an adequate or approved SIP budget)
- Include all regionally significant projects expected in the nonattainment and maintenance area in the RTP and TIP

Regional Inventory

H-GAC conducts regional emission analyses of transportation plans to ensure that these activities are consistent with the air quality goals identified in the AD and RFP SIPs. This conformity analysis of the Houston-Galveston-Brazoria (HGB) nonattainment area accounts for emissions resulting from the nonattainment area’s transportation plans, including all regionally significant projects and the effects of emission control programs.

Motor Vehicle Emission Budgets

The budgets established in the AD and RFP SIPs are as follows:

Table 1: AD Motor Vehicle Emission Budgets

Attainment Demonstration Budgets (tpd)		
Year	NOx	VOC
2018	49.22	45.97

Source: AD SIP, TCEQ

Table 2: RFP Motor Vehicle Emission Budgets

Reasonable Further Progress Budgets (tpd)		
Year	NOx	VOC
2011	135.74	75.17
2014	95.26	61.84
2017	67.95	53.23
2018	60.92	51.35

These MVEBs represent the maximum allowable amount of emissions that may be produced by on-road sources as a result of the implementation of the RTP and TIP. These budgets are developed based on the emission inventories and the analysis conducted for the development of the AD and RFP SIPs, and include emission reduction benefits from federal and state control programs.

Conformity Tests

As specified by the Code of Federal Regulations (40 CFR §93.109[c], as amended by 62 FR 43807, Aug. 15, 1997) all ozone nonattainment areas designated moderate and above must pass a motor vehicle emissions budget test if an approved SIP budget exists. The HGB area has been designated as “Severe” for the 1997 eight-hour standard with an attainment date of June 15, 2019. Since to show attainment, data from a whole ozone season is needed, then the year 2018 is being modeled to show attainment. As noted earlier, the budget test must be satisfied using the MVEBs established in the AD and RFP SIPs. Specifically, this test is satisfied when emissions of the ozone pollutant’s precursors (VOC and NOx) for each analysis year are less than or equal to the MVEBs established in the SIPs. For the test, the regional emission analysis should be performed for any years within the timeframe of the transportation plan, provided they are not more than ten years apart, any year that has an emission budget (2011, 2014 and 2017), the attainment year (2018) and the plan horizon year (2035). To meet this analysis requirement then, the years 2011, 2014, 2017, 2018, 2025 and 2035 were selected.

Modeling

Two modeling suites were used in this process in order to obtain total emissions. The Travel Demand Modeling at H-GAC used the Cube Voyager model with a special post-mode choice speed model in order to establish the region's total vehicle miles traveled (VMT). The TTI suite of emissions software was used in conjunction with the latest version of EPA's MOBILE6 model to replicate the on-road modeling performed in the SIP and obtain the appropriate emissions factors. The data used in this conformity analysis is consistent with what was used in the SIP, except where more recent planning assumptions have been developed. Total emissions were then calculated by multiplying the VMT by the emission factors for each of the analysis years.

Conformity Analysis Results

The results of this conformity determination show that the *2035 Regional Transportation Plan Update Amendment*, the *2011-2014 Transportation Improvement Program*, and the *2013-2016 Transportation Improvement Program* for the HGB Transportation Management Area meet the requirements of the SIPs for the Houston-Galveston ozone nonattainment area and are in accordance with the Clean Air Act (42 U.S.C. 7504, 7506 (c) and (d)), as amended on November 15, 1990, and the final conformity rule (40 CFR Parts 51 and 93).

Table 2: Conformity Analysis Summary

Analysis Year	VOC Emissions (tpd)	VOC Budget (tpd)	NOx Emissions (tpd)	NOx Budget (tpd)
2011	73.11	75.17	134.06	135.74
2014	56.61	61.84	82.96	95.26
2017	46.85	53.23	58.34	67.95
2018	43.94	45.97	46.99	49.22
2025	37.22	45.97	32.89	49.22
2035	44.35	45.97	34.97	49.22

Figure 1: VOC Emissions Summary

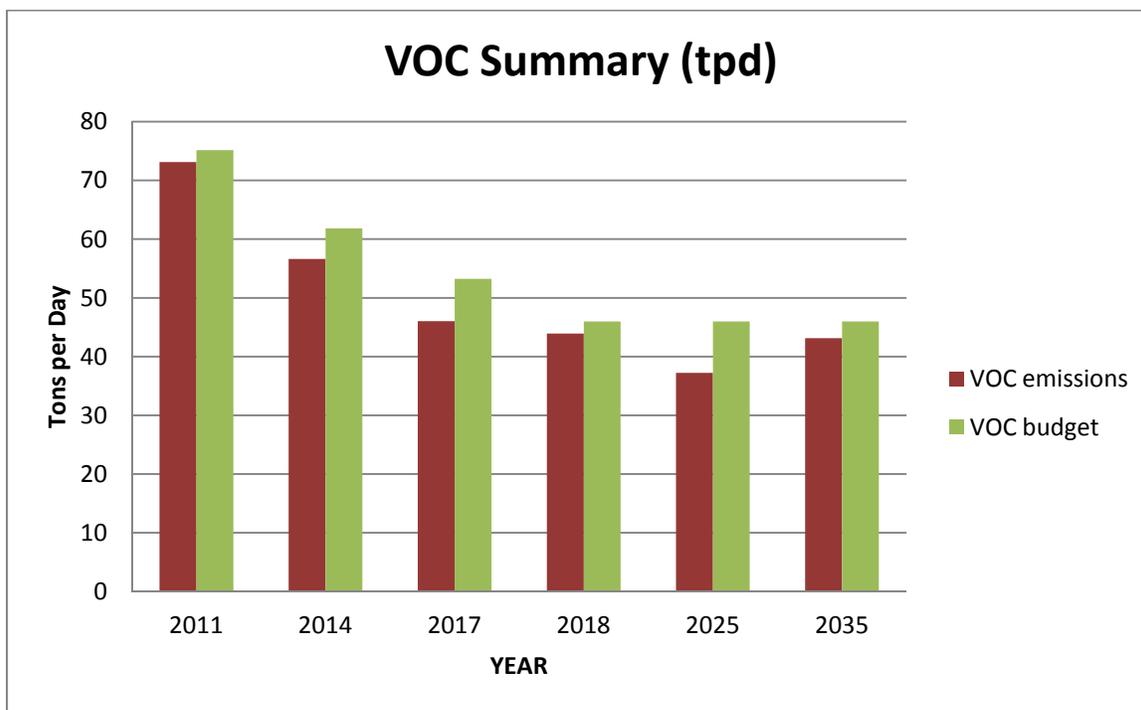
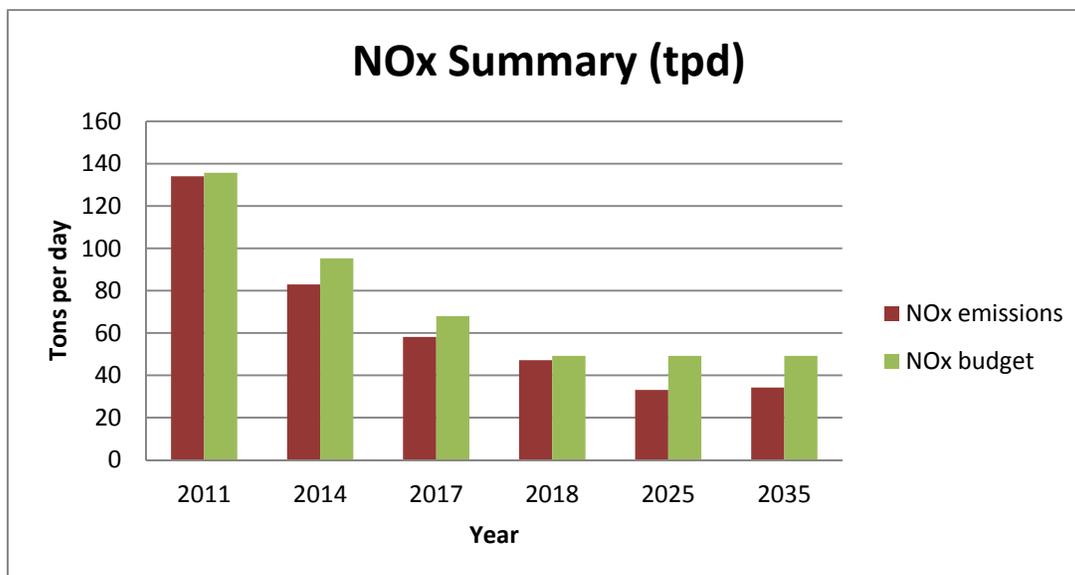


Figure 2: NOx Emission Summary



Background Information on Conformity

More information on what conformity is and the regulations that apply to it can be found at: <http://www.fhwa.dot.gov/environment/conform.htm>. This conformity determination involved a pre-analysis review discussion with the review agencies (Section 7) and a public comment period (Section 8).

1.0 Introduction

With the signing of the Clean Air Act Amendments of 1990 (CAAA) into law, the Houston-Galveston region was designated nonattainment for exceeding the National Ambient Air Quality Standard (NAAQS) for the pollutant ozone. Following the revocation of the 1-hour ozone standard, the Houston-Galveston region was labeled as "moderate" for the 8 hour ozone standard and given until the year 2009 to attain. Then due to the failure to submit an attainment SIP for 2009, the Governor requested to EPA to reclassify the region to "severe". On September 18, 2008, the EPA granted the governor's request to voluntarily reclassify the HGB ozone nonattainment area from a moderate to a severe nonattainment area for the 1997 ozone standard. The effective date of this reclassification is October 31, 2008. The EPA set April 15, 2010, as the date for the state to submit a revised SIP addressing the severe ozone nonattainment requirements. The HGB areas new attainment date for the 1997 ozone standard is as expeditiously as practicable but no later than June 15, 2019. TCEQ submitted a revised SIP on March 10, 2010, EPA has not approved the SIP revisions, but found the motor vehicle emissions budgets contained in the SIP revision adequate for conformity purposes on January 25, 2011 (effective by February 9, 2011).

The CAAA requires each state to submit a state implementation plan (SIP) to the U.S. Environmental Protection Agency (EPA). The SIP is a legally binding document that defines the structure through which emissions will be reduced and the ozone standard will be attained. As the central focus of the air quality planning process, the SIP ties in transportation planning through the conformity provisions in the CAAA. These provisions verify that federal actions on transportation projects are consistent with the air quality objectives contained in the SIP. In many cases, transportation-related control measures identified in the SIP are contained and funded in the Regional Transportation Plan (RTP) and the Transportation Improvement Program (TIP).

Section 176(c)(4) of the CAAA requires the EPA to make rules regarding conformity determinations for transportation plans and programs. In response to this requirement, the EPA published its *Criteria and Procedures for Determining Conformity to State or Federal Implementation Plans of Transportation Plans, Programs, and Projects Funded Under Title 23 U.S.C. or the Federal Transit Act* in the *Federal Register* on November 24, 1993. This conformity rule requires metropolitan planning organizations (MPOs) and the U.S. Department of Transportation (U.S. DOT) to make conformity determinations on metropolitan transportation plans and transportation improvement programs before they are adopted, approved or accepted in air quality nonattainment areas.

1.1 MPO Organization and Role

The Houston-Galveston Area Council (H-GAC) has been designated by the State of Texas as the Metropolitan Planning Organization (MPO) charged with coordinating transportation planning for the region. H-GAC's Transportation Policy Council (TPC) is responsible for the development of the long-range, 30-year transportation plan for the eight-county Transportation Management Area (TMA). The eight counties that form the TMA are Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery and Waller. The ozone nonattainment boundaries are

the same as the MPO boundaries. The TPC provides regional coordination with various stakeholders including cities and counties in the eight-county area, the Texas Department of Transportation (TxDOT), transportation agencies (such as transit, toll and port authorities) and citizens of the region.

This conformity is necessary to fulfill the need to amend the 2035 *Regional Transportation Plan* (RTP) Update. The plan will have to conform to the MVEBs contained in the 8-hour Attainment Demonstration and Reasonable Further Progress SIP that were found adequate by EPA on January 25, 2011.

1.2 Purpose

To demonstrate conformity, as defined by the EPA's final rule, analyses of transportation plans and TIPs must address the following criteria:

- Are the RTP and TIP consistent with the most recent estimates of on-road mobile source emissions?
- Do the RTP and TIP provide for expeditious implementation of transportation control measures (TCMs) in the applicable SIP?
- Do the RTP and TIP contribute to annual emission reductions consistent with Section 182(b) and Section 187(a)(7) of the CAAA?

This criteria is met and conformity is demonstrated if both VOC and NO_x emissions in each of the analysis years modeled conforms to the criteria in Section 1.3.

1.3 Conformity Criteria

The final conformity rule requires MPOs in air quality nonattainment and maintenance areas to conduct conformity determinations on their transportation plans and TIPs. The rule requires that conformity analyses adhere to a number of criteria:

- The analysis process must use the most recent planning assumptions in force at the time of the conformity determination and employ the latest available and approved emissions model.
- The transportation plan and TIP must provide for the timely implementation of TCMs from the applicable SIP.
- A regional emissions analysis must be conducted for significant air quality milestone years and the RTP horizon year.
- VOCs and NO_x emissions from each analysis year must be less than or equal to the MVEB established in the applicable SIP.
- Interagency consultation, as well as a public involvement process, must be conducted during the analysis (found in Sections 7 and 8, respectively)

1.4 Document Format

The format and content of the conformity documentation was determined by the Technical Working Group (TWG). The TWG is a group of technical on-road modelers, planners, and engineers from MPOs and councils of government across the state, as well as representatives from state and federal agencies. This document includes:

- Summary of economic/demographic inputs to the travel modeling process by analysis year;
- Listing of emission model inputs by analysis year;
- Determination of regional transportation emissions;
- Estimates of emission reductions from TCMs and a demonstration of their timely implementation;
- Adjustments to estimated vehicle miles traveled based on a historic comparison to the Highway Performance Monitoring System (HPMS);
- Summaries of travel demand forecasts (person, vehicle and transit trips by mode and purpose) and summaries of vehicle miles of travel (by major functional classifications and vehicle speed) for each analysis year;
- Listings of regionally significant federal, state and local added capacity highway and transit projects by analysis year, including funding source; and
- Network link listings by analysis year.

1.5 Electronic Data Submittal

This document is available in hard copy and in electronic format. Submittal of the conformity to review agencies will be in electronic format, except to agencies that have specifically requested a printed copy. Additionally, this material is available on the H-GAC Conformity Web site:

http://www.h-gac.com/taq/airquality_model/conformity/2012/default.aspx

1.6 Pre-analysis Consensus Template

The Documentation Subcommittee of the TWG created the Pre-analysis Consensus Template. The purpose of this document is to reach early agreement on the parameters that will be used for the conformity calculation. This document serves the dual function of reminding the submitting agency to submit everything listed on the sheet, and to serve as a quick reference for review agencies. This time the consultation partners could not reach an agreement on the Pre-analysis Consensus Template document previous to the air quality analysis, as a consequence this document was not used for this conformity.

2.0 2035 RTP Update, 2011-2014 TIP & 2013-2016 TIP Conformity to the SIP

The purpose of this document is to demonstrate that the amendments to the 2035 RTP Update and 2011-2014 TIP and the 2013-2016 TIP conform to the MVEBs established in the AD and RFP SIP.

2.1 Overview

The amended *2035 Regional Transportation Plan (RTP) Update* considers the transportation needs of the eight-county HGB region. It is a long-range plan that identifies mobility and access goals for our region, strategies to meet these goals, and priority actions to be implemented by 2035. The area covered by this plan includes Harris, Galveston, Brazoria, Fort Bend, Montgomery, Liberty, Chambers and Waller counties. These counties comprise the consolidated metropolitan statistical area (CMSA), a region of more than 7,000 square miles and almost 5 million residents.

2.2 Submittal Frequency

According to the *2005 Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU)*, which was signed into law on August 10, 2005, the RTP is required to be updated every four years. The TIP is the four-year program of transportation investments and is considered the implementation tool of the long range plan. When either the RTP or the TIP is updated, a new conformity analysis must be conducted. Additional conformity triggers include the EPA finding of adequacy of new MVEBs, approval of SIPs containing new MVEBs and expiration of the four-year period for which a conformity determination lasts.

2.3 Transportation Control Measures (TCMs)

The transportation control measures are reasonable available control measures that are committed to the SIP.

The 2011-2014 TIP includes and clearly identifies the reasonable available control measures committed to in the SIP for our region. These TCMs, like the voluntary mobile emissions reduction program, could be used to conform to the regional air quality goals. The MPO is committed to completing these projects within the required attainment timeframe. The emissions benefits for these projects and all committed CMAQ funded projects are located in Chapter 2 of the TIP and in Appendix 13 of the conformity documentation. The project selection process for the TIP requires project sponsors to provide information pertaining to their public involvement and environmental justice process. Each sponsor is encouraged to provide documentation including meeting schedules, minutes, comments and petitions/surveys. Information regarding outreach materials and meeting locations are also identified through the selection process. Sponsors include information regarding advertising and meetings conducted in multiple languages, low-income and elderly areas, and meeting locations accessible to transit.

2.4 Regionally Significant Projects

The 2011-2014 TIP includes all regionally significant projects regardless of funding source, since the HGB region is a nonattainment area. Regionally significant projects using federal or

state highway funds are located in Chapter 2 and locally funded regionally significant projects are identified in Chapter 4 of the TIP. Chapter 3 of the TIP contains all federal, state or locally funded projects that are related to transit activities. This chapter also contains and clearly identifies the projects that are expected to be transferred from FHWA programs to FTA programs. All the projects are also listed on Appendix 12 of this conformity.

Regionally significant roads are identified as: interstate/toll roads, other urban freeways or expressways, rural principal arterials, and urban minor arterial roads or streets. Regionally significant projects are defined as:

1. The project must be a non-exempt roadway project which meets the following criteria:
 - a. Proposed roads that will likely meet federal criteria for all-arterial or higher functional classification.
 - b. Upgrade to arterial or higher functional classification.
 - c. An added capacity project being constructed on new alignments as a bypass to a principal arterial/interstate.
 - d. Addition of through traffic lanes of 1 mile or more on roads that are functionally classified as an arterial or higher as defined in the travel model.
 - e. New interchanges on roads that are functionally classified as an arterial or higher, that represent new connections.
 - f. Adding or extending freeway auxiliary/weaving lanes from one interchange to a point beyond the next interchange.
2. As traffic conditions change in the future, the MPO, in consultation with the interagency consultation group, will consider regional significant all future roadways facilities that carry an average of 11,000 vehicles per day for a 2 lane facility and 20,000 vehicles per day for a 4 lane or greater facility between logical termini.
3. Any fixed guideway transit service including light rail, commuter rail, or portions of bus rapid transit that involve exclusive right-of-way (including barrier separated HOV lanes) shall be considered regionally significant.
4. Non-exempt projects not addressed in the above statements will be decided on a case-by-case basis through the interagency consultation process. The consultation will occur before taking the plan to TPC (either plan or TIP revision), and prior to the environmental determination.

2.5 Regionally Significant Travel Programs

The 2035 RTP Update maintains a collection of solutions to minimize the growth of congestion associated with our growing population. These solutions include a combination of strategies, programs, and projects to improve regional mobility and quality of life for all citizens. Public Outreach comments over the years consistently articulate an urgent need for congestion reduction, improved mobility, and an increase in travel choices. The 2035 RTP Update continues four major strategies to aid in the goals of improving regional mobility and safety, and reducing congestion, while minimizing the associated negative air quality impacts. This RTP recommends maximizing the following strategies:

- System Capacity – increasing highway and transit capacity
- Demand Management - for peak-period travel
- Operations Management – improving the efficiency of existing facilities
- Livable Centers – coordinating land use and transportation investments

2.5.1 System Capacity

This section provides an overview of the recommended system capacity improvements contained in the 2035 RTP Update including roadways, transit (inside and outside of the METRO service area), and port/airport expansions. The 2035 RTP Update adds 1,570 freeway and tollway miles, as well as 2,229 arterial miles. For a full list of added capacity projects please refer to Appendix 12.

Transit

METRO Solutions 2035 is the agency’s long range planning document. It is an iterative process that incorporates future mobility needs identified in regional planning efforts. The plan recommends significant expansion of the current transit system and includes a network of integrated high capacity transit facilities on major travel corridors. METRO’s Solutions 2035 also identifies significant service expansions beyond the METRO service area.

HOT/HOV Lanes

Begin the conversion to dual direction tolled facilities in major corridors in existing Bus/HOV Corridors.

Ports and Airports Expansion Plans:

- Continued development of a major container and cruise terminal complex called the Bayport Terminal Project, developed by the Port of Houston Authority
- The Port of Galveston expansion plans reflect increases in their cruise ship activity
- The Port of Freeport’s major expansion plans include cargo handling capabilities
- The northeast side of Bush Intercontinental Airport may provide access to the proposed I-69 NAFTA Superhighway
- Expansion of passenger facilities at Hobby Airport

2.5.2 Demand Management

Travel demand management focuses on moving people, rather than moving vehicles. Its primary goal is to modify travel habits so that demand is lessened through incentive or disincentive programs. Such programs encourage increased utilization of other transportation modes, travel during non-rush hour periods, and alternate routing. Examples of travel demand management programs include teleworking, vanpools, and congestion pricing.

2.5.3 Operations Management

Operational improvements include the continued installation and usage of Computerized Traffic Management Systems (CTMS) with video camera surveillance and incident detection and response, ramp metering and Arterial Traffic Management Systems (ATMS) that will interconnect traffic signals along specific corridors. Additional strategies are recommended related to Intelligent Transportation Systems (ITS).

Access Management is another operations management concept. Access Management enhancements help decrease vehicle delay through a range of options, such as traffic light synchronization, deployment of roundabouts, medians, constructing or extending turn bays (as needed), consolidation of duplicate driveways and partial grade separation of some traffic lanes at major intersections, as appropriate.

A viable safety evaluation and improvement program is an integral component of the 2035 RTP Update. It is estimated that half of the congestion experienced in the region is due to incidents on the highway. The H-GAC Transportation Safety Program works to identify and develop recommendations to remediate traffic safety issues throughout the region. The program helps to determine high frequency crash locations as well as crash types and evaluates a range of countermeasures to reduce these crashes based on relevant factors.

A Security-Evacuation plan based upon hurricane evacuation modeling is currently being developed for the region. H-GAC has developed a data base of traffic control points, and has worked with TxDOT to develop a web-based evacuation map that will allow the user to track the implementation of the traffic management plan, and has developed a Hurricane Evacuation for Special Needs Communication Plan. The following elements are currently in place should another hurricane or major regional emergency occur:

- Pre-positioned tow trucks
- Designated fuel stops
- State directed fuel resources
- Buses at pre-designated locations such as the Reliant Park and George R. Brown Center
- Pre-arranged destinations and lodging

2.5.4 Livable Centers: Connecting transportation and land use

The amended 2035 RTP Update maintains that significant mobility gains are possible through better coordinated land use and transportation planning. H-GAC utilizes a three-pronged land use and transportation coordination strategy that calls for the: creation of bicycle and pedestrian friendly **Centers**; establishment of better **Connections** between the centers, and designs based on the **Context** of the surrounding land uses. In addition to enhancing mobility choices, this **3C's** strategy is expected to produce economic, environmental and “quality of place” benefits for the region.

2.6 Locally Funded Projects/Programs

Federal and state revenues for building and maintaining the region’s transportation network are not keeping pace with demand. One method of generating additional resources is through the creation of toll facilities that provide additional sources of funding. These additional sources of revenue may provide the necessary funding for implementing regional improvements to the transportation network without necessarily requiring federal funds. The following projects may be supported with toll revenue:

- SH 99 (Grand Parkway) Full corridor (proposed)
- Northwest corridor (new facility) New corridor (proposed)

- SH 35 New corridor (proposed)
- U.S. 290 HOT lane (proposed)
- SH 288 HOT lane (proposed)
- Hardy Toll Road extension
- Westpark expansion

2.7 Exempt Projects/Programs

Exempt projects include safety, landscaping and those projects with minimal environmental impacts. Examples of such projects are:

Safety

- Hazard elimination program
- Shoulder improvements
- Pavement resurfacing and rehab
- Fencing
- Increasing sight distance
- Traffic control devices other than signalization

Mass Transit

- Purchase of support vehicles
- Construction of passenger shelters
- Purchase of office equipment
- Operating assistance to transit agencies

Other

- Projects that do not lead to construction activities
- Planning and technical studies
- Sign removal
- Landscaping
- Engineering to access social, economic or environmental impacts
- Repair of damage by natural disasters

2.8 Constraints

The EPA has designated the eight-county HGB area as nonattainment for ground-level ozone (O₃). While transportation is not this region's only source of ozone precursor pollutants, continued reductions of pollutants from on-road vehicles is an essential part of our plan to attain clean air standards. Consequently, the RTP and TIP are required to conform to emission limits set by the Texas Commission on Environmental Quality (TCEQ) and approved by the EPA.

In addition to the conformity requirements discussed above, the RTP and TIP must meet certain statutory planning requirements, as set out in 23 CFR Part 450 and 49 CFR part 613. The sections below discuss these constraints.

2.8.1 Long-Range Financial Constraint (RTP)

The fiscal constraint requirement is intended to ensure that the total estimated costs of projects included in the RTP and the estimated cost of constructing, operating, and maintaining the total (existing plus planned) transportation system over the period of the RTP does not exceed reasonably available estimated revenues. A conformity determination on fiscally constrained

plans ensures that conformity findings are based on realistic plans and programs, and that TCMs and other projects which may be beneficial to air quality are funded.

This conformity reflects additional revenues that were not anticipated in the 2035 RTP Update approved by the Transportation Policy Council in October 2010. These additional revenues, totaling \$1.4 billion, are the result of allocations from state and federal funding programs as well as additional local financial commitments, bringing the total estimate of reasonably available revenues to \$87.1 billion. The net effect of revisions to planned expenditures reduces the total by \$1.7 billion to \$84.0 billion, primarily a result of updated costs estimates and the cancelation of projects on local arterial roadways.

On-road mobile transportation is one of several broad categories contributing to the formation of ground-level ozone. To meet the federal air quality standard in this region, reductions are needed from all source sectors. The amended 2035 RTP Update, which was approved by the Policy Council at its April 27, 2012 meeting, includes continued funding for regional mobile source emission reducing programs at or above current funding levels (approx. \$10 million per year) Through 2035. These programs currently include:

1. *Clean Vehicle/Clean Cities – Engine replacement, vehicle replacement and alternative fueling infrastructure;*
2. *Regional Vanpool;*
3. *Commute Solutions – Telework Initiative, Transit Services Pilot Program, NuRide and other ride-sharing services; and*
4. *Clean Air Action – Outreach and marketing to increase program participation, recognition of private and public sector partners.*

2.8.2 Short-Range Financial Constraint (TIP)

The TIP was developed within the estimated allocations for the HGB region for FY 2011-2014. The fiscal constraint for the TIP ensures that those projects committed to can be implemented within the four-year timeframe. Fiscal constraint of the TIP also ensures that our region will be financially able to maintain and operate the existing transportation infrastructure.

3.0 Modeled Activity

This section describes the land use modeling and the travel demand modeling completed for the conformity analysis years.

3.1 Land-Use Model

Base Year (2009) Data

The three major data sources for the base year are appraisal data (from county appraisal districts), demographic data (from the U.S. Bureau of the Census), and employment data (company-level data from a proprietary Info-USA database).

Forecast Process

There are two major phases in the forecasting process. In phase I, H-GAC develops county-level control totals for population, households and employment. In phase II, H-GAC allocates these control totals to specific areas within each county.

Phase I

The development of county-level totals for population, number of households, and number of jobs for future years (from 2009 through 2035) is a multi-step process. H-GAC starts by forecasting the total population in the region (all eight counties combined) using a national population projection from the U.S. Bureau of the Census and applying to it our projection of the region's share in the total U.S. population. In the next step, H-GAC allocates the regional population forecast to the counties using the shares from the two projections (known as "0.5" and "1.0" scenarios) of the county population growth developed by the Texas State Data Center and the Office of the State Demographer. Then, H-GAC derives the forecast for the number of households in each county from the ethnic and age compositions (drawn from the scenarios) of the forecasted county populations and demographic statistical relationships obtained from the 2000 Census data. H-GAC's regional employment forecast is driven by the available future population in the working age labor force. The regional employment forecast is then allocated to the counties using projected shares in the regional employment.

Phase II

For small area allocation H-GAC uses the UrbanSim Land Use Forecasting and Simulation Model. The model breaks the region up into very small, regularly spaced squares where each square has an area of one million square feet, or approximately 23 acres. UrbanSim then analyzes land use dynamics, and determines statistical relationships between different types of land uses and various factors, such as proximity to population and employment, land values, and accessibility over the transportation network. Based on that information, the model makes predictions about the likelihood of certain type of development in certain parts of the region. The model works by "creating" housing units and job slots (non-residential square footage) and then allocating population and employment growth (defined by county control totals) into available housing and job locations.

While the elementary geographic unit of the forecast is the UrbanSim grid cell, the forecast results are available for different geographic units (Regional Analysis Zones, Transportation Analysis Zones, Census Tracts, cities, zip codes). For travel demand modeling purposes, the

forecast for Travel Analysis Zones (TAZ) is derived by aggregating (summing up) results for individual UrbanSim grid cells located within TAZ.

The development of the forecast was overseen by the Forecast Advisory Committee comprised of local experts on demographic, economic, and development trends in the H-GAC region. During summer and fall of 2005, H-GAC conducted five forecast workshops, open to general public, throughout the region where the preliminary results were presented and feedback was received. Once the committee approved the draft forecast for public review and comment, the forecast results were provided to all local governments within the TMA, and were placed on H-GAC's website for review by the public. The H-GAC's Board of Directors adopted the forecast in February 2006. The regionally adopted forecast for employment and population has been used in all Conformity findings since its adoption in 2006. However, as part of this Conformity effort, the 2009 household forecast was recalculated based on 2010 Census data; accordingly the 2009 households estimate for the region was increased by 27,000. Based on the 2009 back cast accuracy, no adjustment to future years (2014, 2017, 2025 and 2035) was needed.

Conformity Analysis Years

The H-GAC forecast includes county control totals and small TAZ-level data for every year from 2011 through 2035. The summary forecast data for the conformity years are presented in Table 3, below.

Table 3: Comparison of Forecast Data for Conformity Years

		Brazoria	Chambers	Fort Bend	Galveston	Harris	Liberty	Montgomery	Waller	Region
Population (thousands)	2011	304	35	524	293	4,088	83	455	43	5,825
	2014	324	37	569	311	4,277	87	497	46	6,147
	2017	344	39	617	328	4,470	91	542	49	6,482
	2018	351	40	634	334	4,536	93	558	51	6,596
	2025	399	45	757	367	5,012	104	675	60	7,418
	2035	469	53	935	404	5,769	120	858	76	8,683
Households (thousands)	2011	112	13	181	116	1,483	30	168	15	2,119
	2014	120	14	201	124	1,557	32	186	17	2,252
	2017	129	15	222	132	1,637	34	206	18	2,393
	2018	132	15	229	134	1,665	35	212	18	2,441
	2025	153	18	275	150	1,863	40	261	22	2,782
	2035	184	21	344	169	2,173	47	336	28	3,302
Jobs (thousands)	2011	103	9	166	120	2,296	24	133	14	2,866
	2014	109	9	180	126	2,396	26	145	15	3,006
	2017	114	10	194	131	2,491	27	156	16	3,140
	2018	116	10	199	134	2,522	28	159	16	3,183
	2025	129	11	236	147	2,746	31	189	18	3,507
	2035	152	13	299	171	3,136	36	239	22	4,069

Source: H-GAC, September 2012

3.2 Travel Demand Model

3.2.1 Model Description

To address the conformity tests, analysis year networks were developed for 2011, 2014, 2017, 2018, 2025, and 2035. Results from the 2009 base year network, developed for the Base Year Emission Inventory, are used for comparison. The HGB regional travel model was used to estimate the daily travel inputs to this conformity analysis.

3.2.2 Model Validation

The models have been validated for the 2009 base year. Documentation of this validation is presented in Appendix 3. The procedures used to develop disaggregate time-of day travel and speed inputs are the same as those used in the development of the MVEBs located in the RFP and AD SIP for the HGB nonattainment area.

3.2.3 Network Development

The regional roadway networks used in the conformity analysis represent the system of roadways assumed to be operational in each of the analysis years (2011, 2014, 2017, 2018, 2025 and 2035). For example, the 2011 roadway network represents current roadways, plus roadways under construction, and roadways expected to be operational by the end of FY 2011. The 2018 network includes all roadways in the 2011 roadway network plus all roadways expected to be operational by the end of FY 2018. This procedure is likewise repeated for all the other analysis years.

3.2.4 Model Adjustments

Travel Demand Model (TDM) output is adjusted by two factors: highway performance monitoring system (HPMS) and seasonal adjustment factors. The HPMS adjustment factor was used to adjust the 2009 travel demand model for HPMS consistency. The current TDM validation year is 2009. This factor was developed for this conformity using the 2009 TDM validation document (H-GAC, December 2009), the estimated intrazonal VMT for the 2009 TDM, and the 2009 HPMS vehicle miles of travel (VMT) reported by TxDOT.

In order to directly compare 2009 regional modeled VMT to HPMS estimated 2009 VMT, HPMS VMT is adjusted to represent average non-summer weekday travel, based on an adjusted factor developed using TxDOT permanent traffic recorder data.

$$\begin{aligned} & \text{Model estimated average non-summer weekday travel (ANSWT)} \\ & = (\text{Model network VMT}) + (\text{Model Centroid Connector VMT}) + (\text{Model Intrazonal VMT}) \\ & = (138,724,499) + (13,556,633) + (932,060) \\ & = 153,213,192 \end{aligned}$$

$$\begin{aligned} & \text{HPMS estimated average non-summer weekday travel (ANSWT)} \\ & = (\text{HPMS AADT}) * (\text{AADT to Non-Summer Weekday Travel Adjustment Factor}^A) \end{aligned}$$

$$= (130,558,601) * (1.05909)$$

$$= 138,273,309$$

A – 2009HGB ATA Data

The HPMS Adjustment is calculated by dividing the HPMS estimated average non-summer weekday travel VMT by the Model estimated average non-summer weekday travel::

$$= (\text{HPMS estimated ANSWT}) / (\text{Model estimated ANSWT})$$

$$= (138,273,309) / (153,213,192)$$

$$= .90249$$

3.2.5 Transit Systems

In September 2003, the Metropolitan Transit Authority (METRO) Board of Directors approved a fare increase. Prior to September 2003, there had been no transit fare increase since the previous conformity determination of the RTP. However, since summer 1997, ridership levels have risen. The analysis of marketing/survey data appears that revised fare structures and increased marketing efforts have played a role in the enhanced ridership levels.

Assumptions regarding the level of transit service for the conformity determination of the RTP are consistent with METRO's current Regional Transit Plan and subsequently completed Major Investment Studies. Transit fares were assumed to remain at existing levels throughout the analysis period. Both existing and future toll facilities were evaluated assuming currently reflected toll pricing would remain at a fixed amount. **The transit network was supplied by METRO in March of 2012.**

3.2.6 Roadway VMT

Base Year (2009) Inventory

The 2009 household forecast was modified to incorporate 2010 Census household estimate; the results on this analysis are detail in Table 4. However since the census does not collect employment data, the 2009 employment data was not modified. Using the 2009 revised household and employment information for the eight-county Transportation Management Area (TMA), trip generation (i.e., production and attraction) estimates were developed for each of twelve trip purposes: home-based work (HBW), home-base-non-work-retail (HBNW-Retail), home-base-non-work-education-1 (HBNW-Ed1), home-base-non-work-school-bus (HBNW-Sch-Bus), home-base-non-work-other (HBNW-Other), home-base-non-work-airport (HBNW-Airport), non-home-base-workbased (NHB-Workbased), non-home-base-Other (NHB-Other), external-local-auto (Ext-Loc-Auto), External-local-truck (Ext-Loc-truck), Truck trips (TR) and Taxi trips (TX). The trip production models used to produce these estimates are cross-classification models based on household size and income, while the attraction models are based on employment. The 2009 external-local and external-through trip tables were based on 1995 external station (cordon) volumes.

Table 4: Base Households of Existing 2009 Forecast
and Reconciled 2009 Household Estimate

County	2009 Existing	2009 Reconciled	Change From 2000	% Change
Harris	1,434,323	1,403,264	-31,059	-2.17%
Brazoria	106,390	104,208	-2,182	-2.05%
Fort Bend	167,610	183,386	15,776	9.41%
Waller	14,495	13,634	-861	-5.94%
Montgomery	156,103	158,928	2,825	1.81%
Liberty	29,130	24,513	-4,617	-15.85%
Chambers	12,240	11,692	-548	-4.48%
Galveston	112,132	106,554	-5,578	-4.97%
Total	2,032,423	2,006,179	-26,244	-1.29%

Source: Trip Generation Data for 2012 prepared by H-GAC

Using a 2009 highway network and a set of F-factors calibrated and validated to the year 1995, person trips by purpose, as well as the truck-taxi and external-local vehicle trips, were distributed using the Disaggregate Trip Distribution Model (the Atomistic Model) of the TxDOT Trip Distribution Package (TTDP).

Transit mode shares were estimated based on Metro's 2007 Transit On-Board Survey. Following the estimation of transit mode share, the mezzo-level high-occupancy vehicle (HOV) carpool model of the TTDP was used to account for and estimate the level of usage of the HOV lane system by carpools and convert the person trip tables to vehicle trip tables. The HOV carpool demand on the 2009 HOV lane system was estimated based on the transit mode share estimates produced by METRO and the auto occupancy estimates from the 1995 H-GAC Regional Travel Survey.

The vehicle trip tables were factored by trip purpose to represent the time periods desired for the estimation of time-of-day travel demand following the conversion of the person trip tables to vehicle trip tables. The procedure used by H-GAC to factor trip tables relies on time-of-day trip

table factors by trip purpose and the trip table factoring procedures of the TTDP. The trip table factors were developed based on an analysis of the 1995 H-GAC Regional Travel Survey data. Because the Regional Travel Survey contained no data on truck/taxi and external travel, survey data from other urban areas was used to develop trip table factors for those trip purposes.

In addition to factoring the 24-hour trips to represent the desired time period, the trip tables were converted from production-to-attraction orientation to origin-destination orientation. The factors used to perform this step were also based on the 1995 H-GAC Regional Travel survey.

Time-of-Day Trip Table Factors

Based on analyses of the trip table factors developed in 60 minute intervals, the daily vehicle trip tables were separated into the following time periods:

A.M. Peak: 6:01 a.m. - 9:00 a.m.
Midday: 9:01 a.m. - 3:00 p.m.
P.M. Peak: 3:01 p.m. - 7:00 p.m.
Overnight: 7:01 p.m. - 6:00 a.m.

Following the separation of the 24-hour trip tables by purpose for each of the four time periods, the trip tables for each trip purpose were summed to develop a single time-of-day trip table (e.g., A.M. Peak trip table). Each time-of-day trip table was then assigned to the appropriate 2009 time-of-day network.

The time-of-day networks are the 2009 network with capacities reflective of the appropriate time-of-day. For example, the facilities represented in the 2009 a.m. peak network have 3-hour peak-period capacities that vary by facility type, number of lanes, and area type.

The resulting time-of-day link volume estimates were then entered into H-GAC's post-assignment speed model to develop link-level time-of-day speed estimates. The post-assignment speed model is based on procedures recommended in Highway Vehicle Speed Estimation Procedures for Use in Emissions Inventories prepared by Cambridge Systematic for the EPA in September 1991.

The speed estimation model relies primarily on the speed estimation techniques described in the Highway Capacity Manual (HCM). The HCM relationships are used to estimate the speeds for estimated volume-to-capacity ratios from zero to one. The extensions of the models for volume-to-capacity ratios exceeding one are based on the traditional Bureau of Public Roads (BPR) impedance adjustment function. The methods rely on the estimated volume-to-capacity ratio as a key measure of congestion for estimating the congested speed based on the constrained equilibrium volume of a link. Separate procedures are used for freeways and non-freeway streets.

The speed model was developed and calibrated by applying speeds to the 2005 a.m. and p.m. peak-period assignments for the HGB region, and comparing the modeled directional speeds to more than 22,000 observed directional link speeds encoded in the link data. The models were also validated to year 2005 observed directional speeds.

The centroid connectors in the HGB TMA networks represent local street facilities that provide access to higher-level roadway facilities. Local streets are generally low-volume, uncongested streets. Since there is not a one-to-one correspondence between centroid connectors and the local streets (i.e., a single centroid connector usually represents more than one local street) and since local streets generally operate without significant congestion, the speed models were not used to estimate the centroid connector speeds. The speeds for the VMT represented on centroid connectors were estimated based on the area type of the zone, which is connected to the roadway network by the centroid connector and the length of the centroid connector. The estimated speed for intrazonal VMT (travel within a zone) is developed from the average of the centroid connector speeds for the zone.

The estimated level of travel (VMT) and congestion (speed) by link serve as inputs to the emission model.

Analysis Years (2011, 2014, 2017, 2018, 2025 and 2035)

Using the household and employment forecasts for 2011, 2014, 2017, 2018, 2025, and 2035, trip generation estimates (i.e., production and attraction) were developed for each of twelve trip purposes. The trip production models used to produce these estimates are cross-classification models based on household size and income, while the attraction models are based on employment. Trip generation estimates for external-local and extrapolating historic growth in traffic between 1995 and 2009 developed external-through vehicle trips for all scenarios.

The estimates of person trips by trip purpose, along with network descriptions of the roadway and transit facilities and services, were then put into the regional mode choice model. This model developed forecasts of person trips by eight auto sub modes (single-occupant non-toll, single-occupant toll, two-person non-toll, two-person toll, three-person non-toll, three-person toll, four-plus-person non-toll and four-plus-person toll) and six transit sub modes (walk to local bus, walk to express bus, walk to commuter bus, walk to urban rail, drive to park and ride and drive to kiss and ride) for each of the analysis years.

Travel Model Results

The results of the travel models reflect the expected demographic trends in the region over the next couple of decades, as shown in Table 5. From 2011 to 2035, VMT is projected to climb 45.6 percent from about 138.7 million in 2011 to a total of over 206.5 million VMT per day in 2035 for the eight county region. Table 5 shows the 24hr regional VMT after both seasonal (1.01385) and HPMS (.90249) adjustments were applied. The seasonal factor was calculated by the Texas Transportation Institute and the HPMS factor is calculated in section 3.2.4.

Table 5: Vehicle Miles Traveled for the Eight-County Transportation Planning Region for 2011, 2014, 2017, 2018, 2025 and 2035

Analysis Year	Vehicle Miles of Travel (VMT)
2011	138,749,439
2014	142,597,485
2017	150,133,283
2018	152,767,689

2025	171,405,296
2035	206,512,550

4.0 Emission Factors/MOBILE Model

The U.S. EPA MOBILE model is at the center of this conformity analysis. This model generates emission factors (in grams/mile) for 28 vehicle categories for a wide variety of years. This conformity analysis utilized MOBILE6.2.03, which is the most recent version of this model. Emissions analysis methodologies in this conformity are consistent with procedures used to estimate the emissions budgets in the AD and RFP SIP. The interagency consultative process was used to define any necessary changes to emission calculations due to federal or state control measures that have been promulgated since the modeling for the AD and RFP SIP was conducted.

4.1 Overview

This conformity analysis used a directional link-based hourly methodology to develop emissions estimates. This methodology replicates the methodology used in setting the MVEB. EPA's MOBILE6.2.03 model was used to develop emissions factors by:

- Hour;
- MOBILE6 road type (or drive cycle); and
- 28 vehicle types

The speed sensitive freeway and arterial emissions factors, and the fixed-speed ramp emissions factors were used. The freeway emissions factors were applied to links with interstate, freeway, and toll roads functional classification codes; the ramp emission factors were used with links coded as ramp (for freeway, toll roads, and frontage roads); and arterial emissions factors were applied to all other links. Emission factors are later combined with the TDM output that has been adjusted using the HPMS and seasonal adjustment factors. The HGB 8-hour SIP climatic inputs to the MOBILE model were developed by TCEQ, on January 8, 2009, based on guidance from EPA for use in producing HGB SIP EIs with MOBILE6.2.03. The hourly climatic input features of MOBILE6.2.03 are applied for this effort. The hourly features include: hourly temperatures, hourly relative humidity, 24 hour average barometric pressure, and sunrise/sunset times. These inputs were used for all years and all scenarios.

The basic 1990 base year EI temperature development procedure as described in the guidance document "Procedures for Emissions Inventory Preparation, Volume IV: Mobile Sources" (EPA, 1992) was used to produce the climatic inputs to MOBILE6.2.03 for the current HGB RFP EI effort. The most recent three years of weather observation data are used. TCEQ developed these values based on climate data from the 10 highest ozone exceedance days from the period 2006 through 2008.

ATR-based hourly travel fractions were applied to allocate the episode day type VMT by hour-of-day. Hourly, directional, average operational speeds were modeled by link. Vehicle classification data were used to estimate time-of-day VMT mixes for apportioning fleetwide link VMT for the three road type groups (freeway, arterial and ramp) to the 28 EPA vehicle types. Link-level emissions by vehicle type were calculated by hour.

4.2 *MOBILE Input Parameters*

A full list of MOBILE6 input parameters can be found in Appendix 8. These parameters correspond to the parameters used in the on-road modeling for the AD and RFP SIP, except where more recent planning assumptions have replaced the earlier data. New data includes updated registration distributions, diesel fractions, VMT mix, and new seasonal adjustment factors. It should also be noted that there is no Inspection and Maintenance (I/M) program in the rural counties. Appendix 8 presents all data inputs, including activity data, local meteorological data, state control programs, federal control programs, and vehicle fleet characteristics.

4.3 *Emission Factor Adjustments*

Emission factor post-processing was required to properly model the vehicle Anti-Tampering Program (ATP) and I/M Program, the Texas Low-Emissions Diesel Fuel Program (TxLED), and the implementation of new federal emission standards for motorcycles. The county-level, episode-day-specific emissions factors were organized into tables which were input to the emissions calculations (Section 6).

5.0 Mobile Source Emission Reduction Strategies

This section covers a variety of on-road emission control programs.

5.1 TCMs

A Transportation Control Measure (TCM) is a measure specifically committed to in a SIP for the purpose of reducing emissions from transportation sources. TCMs are further defined in 40 CFR §93.101, as amended by 62 FR 43780, 43803. The CAA required that TCMs be included in SIPs for regions designated as serious and above ozone nonattainment areas. The TCMs committed to in the previous SIPs are listed in Appendix 13.

5.1.1 Timely Implementation of TCMs

The transportation conformity rule includes specific criteria for determining if TCMs that are included in a SIP are being implemented in a timely manner. The intent of these provisions is to ensure that TCMs which are eligible for federal funding receive priority and that the SIP schedules and commitments are enforced. Appendix 13 details the current status of regional TCMs. The TCM Appendix has emission estimates associated with each project. These were developed using the mobile source emission reduction strategies (MoSERS¹) methodology in combination with MOBILE6 emission factors. While emissions were calculated for each project, these credits were not applied in this conformity analysis. Please refer to Section 6.

5.1.2 Project “Slippage”

For TCM projects that have slipped behind schedule, regions are required to identify the obstacle that caused the slippage and to document how the issue will be resolved. These requirements are detailed in 40 CFR §93.113(c)(1-3), as amended by 62 FR 43780, 43809-10. No project slippages have occurred for the committed TCMs.

5.2 VMEPs

The Voluntary Mobile Emissions Reduction Program (VMEP) includes a number of on-road and off-road emission reduction programs that go beyond currently mandated programs. While each individual effort is voluntary, it is mandatory that the overall program achieve the emission reductions specified in the Attainment SIP. This region has committed to a range of VMEPs which are detailed in Appendix 4. The VMEPs are included in the pending 8-hour Attainment Demonstration SIP. The Appendix 4 also provides an updated estimate of emissions benefits resulting from these measures. Credit for the on-road measures will be applied to the final emission numbers in this conformity for the attainment year 2018 since the Motor Vehicle Emissions Budget from the

¹ For more information on the Mobile Source Emission Reduction Strategy (MoSER) calculation methodologies please see the handbook at <http://moser.tamu.edu/>.

Attainment Demonstration SIP includes VMEPS. These VMEPS represent only 1.55 tpd of emission reductions since we needed to subtract the off-road part that represents 0.70 tpd. Please see table below and Appendix 4.

VMEPS	NOx benefits (tpd)
Total VMEPS (on-road +non-road)	2.25
Off-road VMEPS	0.70
on-road VMEPS	1.55

5.3 CMAQ

The Congestion Mitigation and Air Quality Improvement Program (CMAQ) is a categorical funding program created with ISTEA and continued under TEA-21 and SAFETEA-LU. This program directs funding to projects that contribute to meeting NAAQS. CMAQ funds generally may not be used for projects that result in the construction of new capacity available to single-occupant vehicles. For a listing of TIP-funded CMAQ projects, please refer to Chapter 2.

5.4 TERP

The Texas Emissions Reduction Plan (TERP), established by the legislature in 2001, is a comprehensive set of incentive programs aimed at improving air quality in Texas. The Texas Commission on Environmental Quality (TCEQ) administers TERP grants and other financial TERP incentives. The AD and RFP SIP did not use this program to calculate the MVEB, therefore this conformity is not going to use it as a credit. Further information on TERP can be found on the TCEQ website, <http://www.tceq.state.tx.us/implementation/air/terp/>

5.5 Summary

The programs mentioned above typically cannot be modeled in the usual regional emissions modeling process. As a result, off-model credit must be calculated and applied. These on-road programs illustrate the commitment this region has made to improving air quality.

6.0 Determination of Regional Transportation Emissions

Estimates of on-road mobile source emissions are based on recent model runs of H-GAC's travel demand forecasting models (Section 3) and the EPA's MOBILE6.2.03 emission factor model (Section 4), emission factor post-process adjustments (this section), and off-model credits (Section 5). Regional emissions analyses for conformity must contain the following:

1. All federal projects and all regionally significant non-federal projects;
2. All regionally-significant projects, regardless of funding source, are required to be included in the model; and,
3. VMT from all other projects (including TCMs) that are not required to be explicitly modeled must be estimated based on reasonable professional practice.

Conformity analyses must estimate emissions for certain future years called horizon years. These horizon years have very specific requirements:

1. Horizon years may be no more than 10 years apart;
2. The first horizon year may be no more than 10 years from the base year used to validate the transportation demand planning model;
3. If the attainment year is in the time span of the transportation plan, the attainment year must be a horizon year; and
4. The last horizon year must be the last year of the transportation plan's forecast period. or at the election of the metropolitan planning organization, after consultation with the air pollution control agency and solicitation of public comments and consideration of such comments, the longest of the following periods:
 - i. "(i) The first 10-year period of any such transportation plan.
 - "(ii) The latest year in the implementation plan applicable to the area that contains a motor vehicle emission budget.
 - "(iii) The year after the completion date of a regionally significant project if the project is included in the transportation improvement program or the project requires approval before the subsequent conformity determination.
5. If the budget year is in the time span of the transportation plan, the budget year must be a horizon year.

Based on these requirements, the years 2011, 2014, 2017, 2018, 2025 and 2035 were selected for analysis in this conformity. Emissions calculations in a conformity must follow the calculations used in the SIP. This section summarizes the final steps in the emissions estimation process.

6.1 Procedure

The Texas Transportation Institute developed a suite of programs (hereafter referred to as the "TTI suite" or the "suite") that facilitates the calculation of regional emissions. The suite works in conjunction with the MOBILE6 model, discussed in Section 4, to generate

emission factors, and applies these factors to the Travel Demand Modeling results in Section 3.

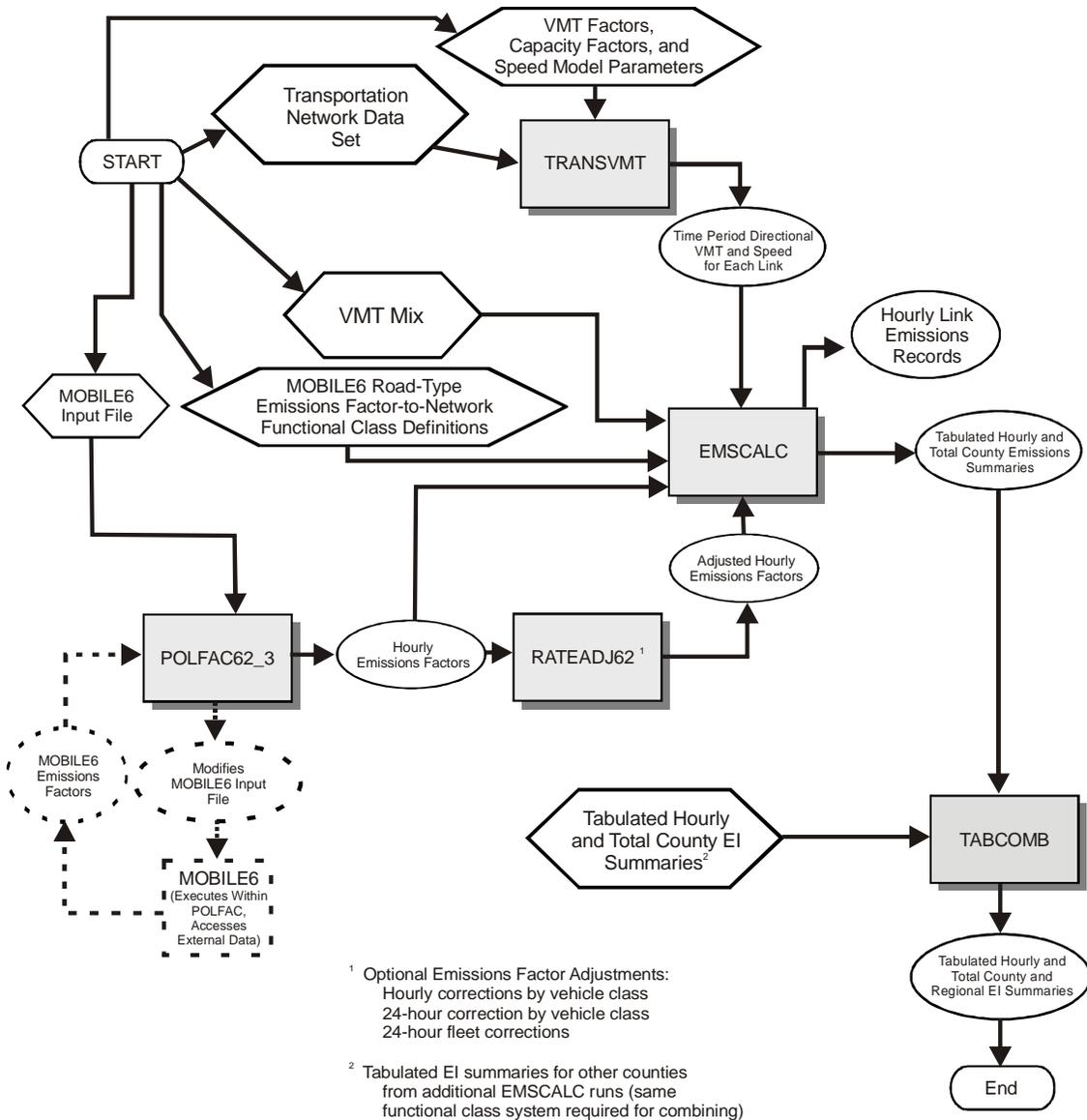
Figure 3 is a basic flowchart of how the TTI suite of programs is applied. The hexagons in this flow chart indicate where data inputs are required. The “Start” in the upper left hand corner symbolizes the point where the air quality modeler has been given the travel demand modeling output. Following the down arrow, MOBILE6 input factors are developed as described in Section 4. At this point POLFAC62 is utilized to run MOBILE6.2.03 to produce emission factors for:

1. all control programs,
2. all counties,
3. all roadways,
4. all vehicle types, and
5. all hours of the day.

The resulting emission factor files are then fed into the RATADJ62DK program, which takes the multiple sets of emission factors for each county and combines them into a single set of emission factors. Then, the output from RATADJ62DK program is fed into the RATEADJV62DK program which adjusts the emission factors due to the use of TxLED and the motorcycle rule. At this point, the emission factors are ready to combine with the Travel Demand Model output.

Figure 3: TTI Suite

Travel Demand Model Network Link-Based Hourly MOBILE6 Emissions Estimates with Texas Mobile Source Emissions Software



Source: TTI, 2009

To the right of the “Start” in the flow chart is the Intratripsoutput program, which calculates the intrazonal trips. The output from the Intratripsoutput program with the loaded network files coming from the Travel Demand Model are the input to the TRANSVMT model. The TRANSVMT program estimates vehicle miles travel (VMT) and estimated operational speeds. These outputs are ready to be combined with the emission factors already generated. The EMSCALC program multiplies the appropriate emission factors with the appropriate VMT for each hour of the day for each county. The hourly EMSCALC outputs are summed by TABCOMB and reported in a tab delimited format (please see the “Emissions” folder in the electronic documentation). The post-process adjustments are made to the TABCOMB output. Appendix 6 provides a more thorough explanation of the TTI Suite of programs.

6.2 Calculated Link-Based Emissions

The link-based emissions, as they are summarized by the TABCOMB step, appear in Table 9. These emissions have further post-processing steps before they are final.

Table 6: Link-Based Emissions Non-Adjusted

Years	NOx (tpd)	VOC (tpd)
2011	134.06	73.11
2014	82.96	56.61
2017	58.34	46.85
2018	50.24	43.94
2025	32.89	37.22
2035	34.97	44.35

6.3 Post-Process Adjustments

The post-process adjustments take place after the emissions from the TABCOMB step are being calculated. The post process adjustments were used only for the attainment year 2018 and follow the same methodology that was developed for the SIP. The temperature and humidity adjustment is based on the fact that higher humidity results in lower NOx emissions and higher temperatures are historically associated with higher emissions except during the cold start. The effect of humidity and temperature has been included in light-duty on-road vehicle emission estimates in MOBILE6, but has not been included for heavy duty vehicles. The humidity and temperature correction factor used for this conformity was calculated by interpolating the correction factor used in the SIP.

Processes	2018	
	NOx (tpd)	VOC (tpd)
Unadjusted	50.24	43.94
Temp/Humidity	-1.70	0.00
VMEP	-1.55	0.00
Final Emissions	46.99	43.94

6.4 Final Emission Analysis Results

Mobile source emissions estimated for the 2035 RTP Update Amendment, the 2011-2014 TIP, and the 2013-2016 TIP are consistent with the most recent projections of population, employment, travel and congestion available. The 2035 RTP Update Amendment demonstrates timely attainment of TCM targets established in the SIP and provides for expeditious implementation of additional measures designed to reduce congestion and vehicular travel demand. VOC and NOx emission estimates from all the analysis years, shown in Table 11, are lower than those estimated for the 1990 base year. Additionally, final VOC and NOx emissions for the years 2011, 2014, 2017, 2018, 2025 and 2035 are lower than the VOC and NOx budgets established by the SIP. The 2035 RTP Update Amendment, the 2011–2014 TIP, and the 2013-2016 TIP therefore, pass all conformity tests required under the EPA's Final Conformity Rule. The transportation improvements in the 2035 RTP Update, the 2011 -2014 TIP, and the 2013-2016 TIP conform to both the SIP and the Clean Air Act, as amended.

Table 7: Final Emission Results

Analysis Year	VOC Emissions (tpd)	VOC Budget (tpd)	NOx Emissions (tpd)	NOx Budget (tpd)
2011	73.11	75.17	134.06	135.74
2014	56.61	61.84	82.96	95.26
2017	46.85	53.23	58.34	67.95
2018	43.94	45.97	46.99	49.22
2025	37.22	45.97	32.89	49.22
2035	44.35	45.97	34.97	49.22

7.0 Interagency Consultation

Interagency review and comment on the conformity finding was conducted in accordance with the consultative process identified in the Conformity SIP. Local, state, and federal transportation and air quality agencies affected by this conformity analysis were consulted on the scope, methodologies and products of the conformity finding. A conformity steering committee (Conformity Consultation Committee) composed of representatives of each of the following agencies was consulted regularly during the conformity process:

- Houston-Galveston Area Council (H-GAC)
- Metropolitan Transit Authority of Harris County (METRO)
- Texas Department of Transportation (TxDOT)
- Texas Commission on Environmental Quality (TCEQ)
- Texas Transportation Institute (TTI)
- Federal Highway Administration (FHWA)
- Federal Transit Administration (FTA)
- U.S. Environmental Protection Agency (EPA)

The purpose of this group was to ensure that the modeling methodology utilized in this conformity analysis was consistent with the on-road modeling utilized in the SIP and that the most recent planning assumptions were used. A comprehensive list of the CCC meeting agenda and decisions can be found in Appendix 15.

8.0 Public Participation

Public participation is an important part of the conformity process. A 30-day public comment period is required by Federal regulation. All documentation for this conformity will be distributed to the consultation committee in the form of CDs and also posted on H-GAC's website on March 2012 (http://www.h-gac.com/taq/airquality_model/conformity/2012/default.aspx). This website will be further utilized to post draft conformity material as it is developed by H-GAC and reviewed by the CCC.

The Public comment period begins on Wednesday, March 28, 2012 and ends on Thursday, April 26, 2012 at 5:00pm. A public meeting will be held on Thursday, April 12, 2012, from 5:30-7:00pm, at H-GAC (3555 Timmons Lane, Houston, Texas). Comments received will be responded to in Appendix 16. The minutes from the public hearing can also be found in the same appendix.