

HOUSTON-GALVESTON AREA COUNCIL

CONFORMITY DETERMINATION

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

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7/16/2013

**HOUSTON-GALVESTON AREA COUNCIL
TRANSPORTATION DEPARTMENT**

Board Resolution



Resolution

NO. 2013-14

CERTIFYING THAT THE AMENDMENTS TO THE 2013-2016 TRANSPORTATION IMPROVEMENT PROGRAM AND THE 2035 REGIONAL TRANSPORTATION PLAN UPDATE ARE IN CONFORMITY WITH THE CLEAN AIR ACT OF 1990, AS AMENDED, AND THE MOVING AHEAD FOR PROGRESS IN THE 21ST CENTURY ACT (MAP-21).

WHEREAS, it has become necessary to certify that the amendments to the 2013-2016 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 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 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 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 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

NOW THEREFORE, be it resolved by the Transportation Policy Council for the Houston-Galveston Transportation Management Area that the 2013-2016 Transportation Improvement Program and the 2035 Regional Transportation Plan Update are in conformity with the 1990 U.S. Clean Air Act as amended, and the Moving Ahead for Progress in the 21st Century Act (MAP-21)

PASSED AND APPROVED this 24th day of May, 2013, at a regularly scheduled meeting of the Transportation Policy Council for the Houston-Galveston Transportation Management Area.

APPROVED:

ATTEST:

Ed Emmett, Chairman
Transportation Policy Council

Tom Reid, Secretary
Transportation Policy Council

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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
CAAA:	Clean Air Act Amendments of 1990
CARE:	Clean Air Responsibility Enterprise
CEM:	Continuous Emission Monitor
CMAQ:	Congestion Mitigation and Air Quality Improvement Program
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 April 9, 2013, the Federal Highway Administration and the Federal Transit Administration certified that the amendments to the Houston-Galveston area's *2035 Regional Transportation Plan (RTP) Update* and the *2013-2016 Transportation Improvement Program (TIP)* met all the requirements for making a joint conformity determination to the State Implementation Plan for the Houston-Galveston ozone nonattainment area.

The EPA action designating the 8-county Houston-Galveston-Brazoria region as nonattainment under the 2008 ozone standard became effective on July 20, 2012 and began a 1-year grace period to demonstrate conformity under the new standard. This grace period expires on July 20, 2013, at which time a conformity lapse could occur if federal approval of this conformity is not obtained. During a conformity lapse, no federal actions for non-exempt projects (added capacity) can occur, including approval of environmental documents and authorizations to obligate federal funds.

Currently, H-GAC is processing a transportation conformity determination update to establish conformity for the non-attainment designation with a classification of "marginal" for the Houston-Galveston-Brazoria area under the 2008 8 hour ozone standard (75 ppb) with 2015 as the attainment year. To satisfy this requirement, 2015 must be added as an additional milestone analysis year.

Following are the major project changes¹ within the Regional Transportation Plan that have been included in this conformity determination:

- **BW 8 SE, Advance segments between SH 288 and IH 10 E (HCTRA)**
- **SH 288 Toll Road, Phase I, 4-lane instead of 2-lane reversible Managed Lanes (TxDOT/BCTRA)**
- **SH 146, Advance segments between Red Bluff and FM 518 (TxDOT/Cat-2)**
- **SH 249, Adjust timing of project elements (HCTRA/MCTRA)**
- **US 59 S, Advance segments between SH 99/FM 762 and SP 10 (TxDOT/TIP Call)**
- **US 290, Advance remaining segments (TxDOT/Cat-2)**

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

Due to the seriousness of the July 20th deadline, this determination has been focused on requested project revisions where (1) a federal action is needed before the next conformity is likely to be available (Dec. 2013, approx.), or (2) all needed documentation with regard to fiscal constraint has been provided and determined to be complete. As a result, some requested modifications to the RTP have been deferred to the next opportunity to revise the RTP and conformity, anticipated for later this year.

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”), which are the “**March 2010 HGB RFP SIP Revision** (TCEQ Project No. 2009-018-SIP-NR, adopted March 10, 2010) [Houston-Galveston-Brazoria Reasonable Further Progress State Implementation Plan Revision for the 1997 Eight-Hour Ozone Standard](#)” and the “**March 2010 HGB AD SIP Revision** (TCEQ Project No. 2009-017-SIP-NR, adopted March 10, 2010) [Houston-Galveston-Brazoria Attainment Demonstration State Implementation Plan Revision for the 1997 Eight-Hour Ozone Standard](#)”. 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 (although MOVES is the latest emission model, this conformity is done using MOBILE6.2.03 because it is allowed under the grace period)
- 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. The MVEBs include emission reduction benefits from federal and state control programs.

Conformity Tests

As noted in Section 1.1, CAA section 176(c)(6) and 40 CFR 93.102(d) provide a one-year grace period from the effective date of designations before transportation conformity applies in areas newly designated nonattainment for a specific NAAQS. Therefore, transportation conformity for the 2008 8 hour ozone NAAQS must be completed within one year of the effective date of nonattainment designations. EPA’s final rule for designating areas for the 2008 ozone NAAQS was effective July 20, 2012, as a consequence the HGB region must demonstrate conformity for this NAAQS before July 20, 2013.

Since there are no SIP budgets available for the 2008 ozone NAAQS, the budgets for the 1997 ozone standard will be used, as explained on EPA’s documentation “Transportation Conformity Guidance for 2008 Ozone Nonattainment Areas”. Specifically, for the new attainment year 2015, the 1997 budget for the year 2014 will be used. The budget 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.

When using the budget test for the 2008 8 hour ozone standard, 40 CFR 93. 118(d)(2) requires the regional emission analysis to be performed for:

- The attainment year for the 2008 ozone NAAQS, if it is within the timeframe of the transportation plan and conformity determination
- The last year of the timeframe of the conformity determination
- Intermediate years as necessary, such that analysis years are no more than ten years apart.

The analysis years chosen must meet 40 CFR 93.118(d)(2) for all NAAQS that apply. During the one-year grace period for newly designated 2008 ozone areas when the 1997 ozone NAAQS also applies, the 2008 ozone areas with adequate or approved 1997 ozone budgets can determine conformity for both of these NAAQS at the same time. In addition, in areas that have budgets for a previous ozone NAAQS that are established for years in the timeframe of the conformity determination, consistency with those budgets must also be determined (40 CFR 93.118(b)). This consistency can be demonstrated by interpolating between the years for which regional emissions analyses are performed (40 CFR 93.118(d)(2)).

To meet this analysis requirement then, the years 2011, 2014, 2015, 2017, 2018, 2025 and 2035 were selected. For the test, the regional emissions analysis must be performed for the attainment year and the horizon year, and any years with an associated MVEB, and any years within the timeframe of the plan provided they are not more than ten years apart. In our case, H-GAC selected all the years to calculate regional emission analysis to agree with the Pre-Analysis Consensus Template (Appendix 17).

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 MOBILE6.2.03 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 amendments to the *2035 Regional Transportation Plan Update and to 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 3: Conformity Analysis Summary

Year	NOx Emissions (tons/day)	NOx Budget (tons/day)	VOC Emissions (tons/day)	VOC Budgets (tons/day)
2011	135.20	135.74	74.20	75.17

2014	92.19	95.26	59.58	61.84
2015	80.98	95.26	55.63	61.84
2017	61.40	67.95	48.88	53.23
2018	48.88	49.22	45.96	45.97
2025	33.10	49.22	38.31	45.97
2035	35.16	49.22	45.91	45.97

Figure 1: VOC Emissions Summary

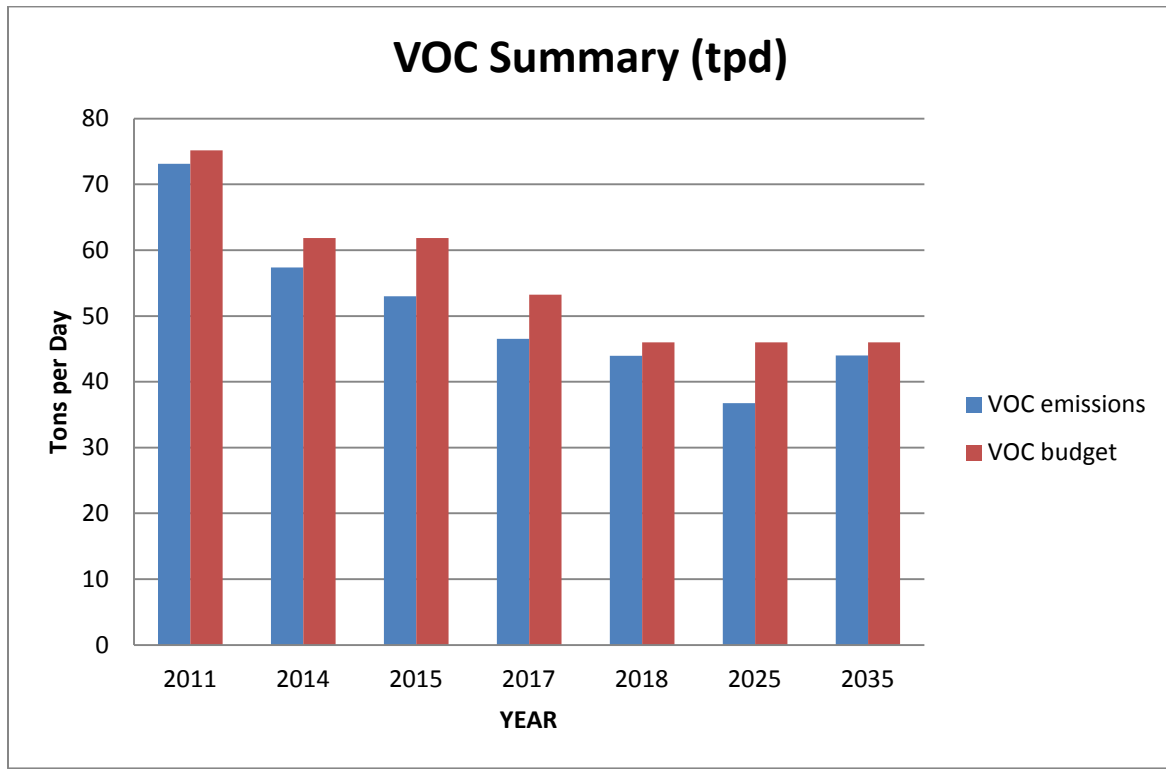
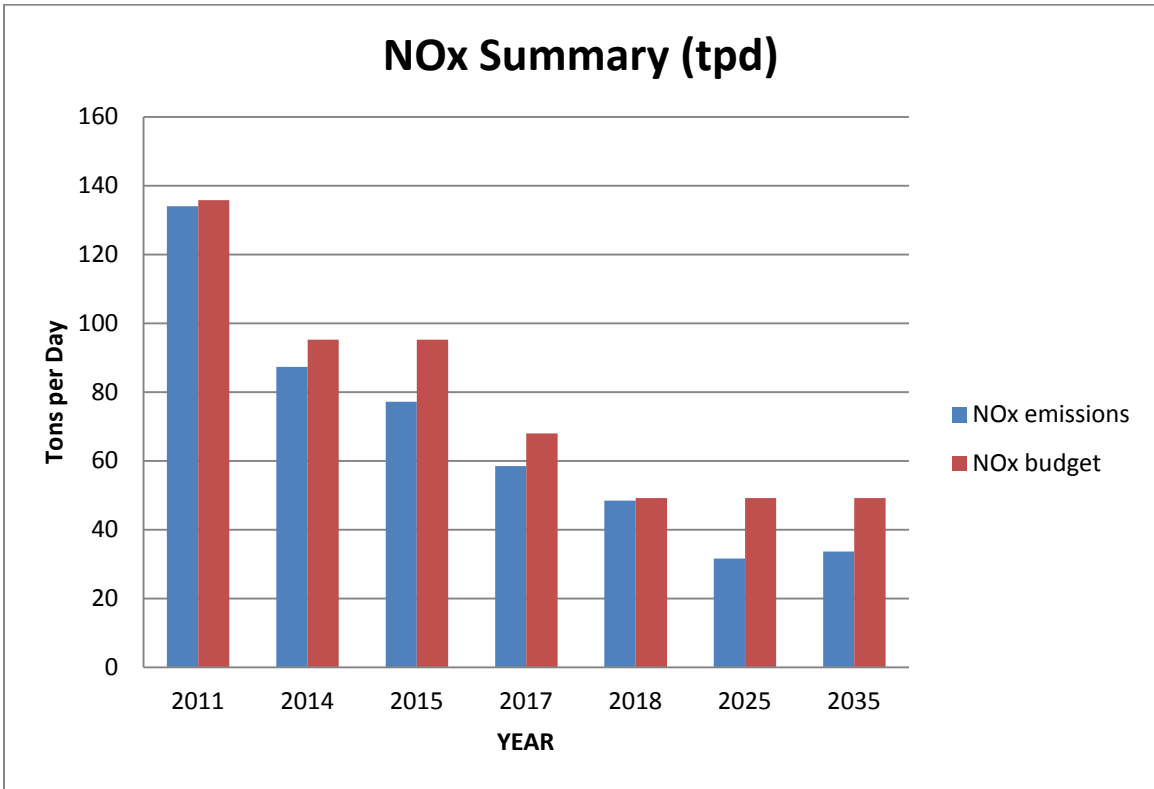


Figure 2: NOx Emission Summary



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

The CAAA requires each state to submit a state implementation plan (SIP) for any area in nonattainment or maintenance of a NAAQS 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 applicable NAAQS will be attained. As the guiding document of the air quality planning process, the SIP connects air quality goals and transportation planning goals 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, as amended, 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.

With the signing of the Clean Air Act Amendments of 1990 (CAAA) into law, the Houston-Galveston region was designated as “severe” nonattainment for exceeding the 1 hour ozone National Ambient Air Quality Standard (NAAQS). In 1997, EPA revised the ozone standard from a 1 hour to an 8 hour standard, and in 2004, the Houston-Galveston region was designated as “moderate” nonattainment for the 1997 8 hour ozone standard, with an attainment year of 2009. The 1 hour ozone NAAQS was revoked through implementation of the 1997 8 hour NAAQS.

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 8 hour ozone standard with an attainment date no later than June 15, 2019. The State of Texas submitted an Attainment Demonstration SIP and a Reasonable Further Progress SIP on March 10, 2010. EPA has not approved these 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).

In addition, the Houston-Galveston-Brazoria region has been designated non-attainment for the 2008 8 hour ozone standard (effective July 20, 2012), with a classification of “marginal”. This new designation triggered a one year grace period to show transportation conformity to the new attainment year which is 2015, with actual attainment date of December 31, 2015. The grace period will expire on July 20, 2013, at which time a transportation conformity lapse will occur if federal (U.S. DOT) approval of the transportation conformity is not obtained. For this reason, H-GAC is undergoing the current conformity determination. Per EPA’s “Transportation

Conformity Guidance for 2008 Ozone Nonattainment Areas”, the first conformity determination for the 2008 8 hour ozone NAAQS will use the motor vehicle emissions budgets from the 1997 8 hour ozone NAAQS found adequate on January 25, 2011.

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 geographic boundaries are the same as the MPO planning 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 determination is necessary to address the requirement that a transportation conformity determination be completed within one-year of the effective date of the area’s non-attainment designation in accordance with the 2008 8 hour ozone NAAQS and to address additional amendments to H-GAC’s 2035 RTP Update and FY 2013-2016 TIP. The RTP and TIP will have to conform to the MVEBs contained in the 1997 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 motor vehicle emissions budgets?
- 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 NOx 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/2013_phase3/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 determination. 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. In this conformity the Pre-analysis Consensus Template document is called Appendix 17.

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

The purpose of this conformity determination is to address the requirement that a transportation conformity determination be completed within one-year of the effective date of the area's non-attainment designation in accordance with the 2008 8 hour ozone NAAQS and to address additional amendments to the 2035 RTP Update and FY 2013-2016 TIP. The transportation plans need to show conformity to the MVEBs established in the 2010 AD and RFP SIP revisions.

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 are included into the metropolitan statistical area (MSA), and are a region of more than 7,000 square miles and almost 5 million residents.

2.2 Submittal Frequency

Consistent with the requirements of Title 23 United States Code (U.S.C.) Section 134, 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, expiration of the four-year period for which a conformity determination lasts, and to be designated in nonattainment for a new NAAQS.

2.3 Transportation Control Measures (TCMs)

Transportation control measures (TCMs) are reasonably available mobile-source emissions control measures that are specifically identified and committed to in a SIP. TCMs that have not been completed must be included in the Transportation Improvement Program (TIP) and receive priority in the programming of funds to ensure their timely implementation. At this time, all TCMs identified in the applicable SIPs have been implemented. This determination does not include emission reductions from TCMs as offsets in the demonstration of conformity to regional emissions budgets.

2.4 Regionally Significant Projects

The 2013-2016 TIP includes all regionally significant projects regardless of funding source, since the HGB region is a nonattainment area. Regionally significant highway projects are listed in Chapter 3 and regionally significant transit projects are identified in Chapter 4 of the TIP. All regional significant projects are listed in Appendix 12 of this conformity. Those projects not

exempt under EPA's conformity rulemaking (40 CFR §93.126) are identified in Appendix 18 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 or found adequate 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 determination reflects additional revenues that were not anticipated in the 2035 RTP Update, as adopted by the Policy Council in 2010. These additional revenues total approximately \$530 million and are the result of allocations from state and federal funding programs in excess of prior funding projections. Including the share of this “supplemental funding” allocated to the HGB region brings the total estimate of reasonably available revenues through 2035 to \$87.6 billion. The net effect of revisions proposed in this conformity determination to planned projects results in anticipated total expenditures of \$82.6 billion.

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 26, 2013 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 contains cost estimates for all capital projects, roadway, transit, bike/pedestrian, air quality improvements, etc., to be implemented in the Houston-Galveston TMA over a four-year period. Projects include those from TxDOT’s 2013 Unified Transportation Plan (UTP) for the years covered by the TIP, as well as those submitted by transit agencies based on their anticipated 2013-2016 grant applications.

Current law requires that the MPO identify all sources of funding that can be reasonably assumed to be available for programming. The following matrix identifies the sources of funding information used in the 2013-2016 TIP:

Primary Sources of Funding Information

	Highway Programs	Transit Programs
Federal	2013 UTP	Recent FTA Apportionments/Discretionary Allocations; Current Full Funding Grant Agreements (FFGA)

State		2013 UTP
Local/Private	Local Transportation Entities (e.g. City of Houston, HCTRA, METRO)	

Additional information regarding fiscal constraint and key funding sources for the TIP can be found in the 2013-2016 TIP under Chapter 2, “Financial Plan”. This document is available on the H-GAC website at <http://www.h-gac.com/taq/tip>

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 steps in the forecasting process. In step I, H-GAC develops county-level control totals for population, households and employment. In step II, H-GAC allocates these control totals to specific areas within each county.

Step 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 eight county region 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 2010 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.

Step 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 each 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 the 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 eight county region, 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 (2011, 2014, 2015, 2017, 2018, 2025 and 2035) was needed. The discussion of backcasting the 2009 household data using the 2010 census data is discussed in appendix 3 – Travel Model Validation. The use of latest census data is an essential element of the HGAC demographic forecast model stream. However, as a general rule, HGAC does not use census data to ground truth the forecast.

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 4, below.

Table 4: 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
	2015	330	38	585	317	4,340	88	512	47	6,257
	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
	2015	123	14	208	127	1,584	33	193	17	2,299
	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
	2015	111	10	185	128	2,427	26	148	15	3,050

	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, 2015, 2017, 2018, 2025, and 2035. Results from the 2009 base year network are used for comparison the 2009 HPMS data. 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 SIPs 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, 2015, 2017, 2018, 2025 and 2035). For example, the 2014 roadway network represents current roadways, plus roadways under construction, and roadways expected to be operational by the end of CY 2014. The 2018 network includes all roadways in the 2017 roadway network plus all roadways expected to be operational by the end of CY 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 adjustment factor developed using TxDOT permanent traffic recorder data.

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

$$\begin{aligned} &= (137,109,395) * (1.066) \\ &= 146,158,615 \end{aligned}$$

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:

$$\begin{aligned} &= (\text{HPMS estimated ANSWT}) / (\text{Model estimated ANSWT}) \\ &= (146,158,615) / (153,213,192) \\ &= .95396 \end{aligned}$$

The seasonal factors were calculated by TTI, using day type and hourly distributions based on factors developed with TxDOT Automatic Traffic Recorder (ATR) data from the Houston area. There are two seasonal factors for the HGB region, one from the Beaumont TxDOT district counties that include Liberty and Chambers counties and the other from the Houston TxDOT district counties that include the counties of Harris, Galveston, Fort Bend, Brazoria, Montgomery and Waller. The seasonal factor for the Beaumont TxDOT district counties for a weekday-non-school period is 1.06428. The seasonal factor for the Houston TxDOT district counties for a weekday-non-school period is 0.96769. These seasonal factors have already been documented on the TCEQ’s “HGB MOVES-based RFP On-road Inventories and Control Strategy Reductions”, prepared by TTI in February 2012.

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 to indicate 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 the 2010 U.S. Census household estimate; the results of this analysis are detailed in Table 5. 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 5: 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 model used to calculate the final air quality emissions..

Analysis Years (2011, 2014, 2015, 2017, 2018, 2025 and 2035)

Using the household and employment forecasts for 2011, 2014, 2015, 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 6. From 2011 to 2035, VMT is projected to climb about 50 percent from about 140 million in 2011 to a total of over 208 million VMT per day in 2035 for the eight county region. Table 6 shows the 24hr regional VMT after both seasonal

(1.06428 and 0.96769) and HPMS (.95396) adjustments were applied. The HPMS factor is calculated in section 3.2.4.

Table 6: Vehicle Miles Traveled for the Eight-County Transportation Planning Region for 2011, 2014, 2015, 2017, 2018, 2025 and 2035

Analysis Year	Vehicle Miles of Travel (VMT)
2011	140,525,060
2014	143,821,184
2015	145,966,350
2017	150,741,930
2018	153,005,419
2025	171,825,787
2035	208,122,927

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 SIPs. 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 SIPs 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 SIPs, except where more recent planning assumptions have replaced the earlier data. New data includes updated registration distributions and diesel fractions. 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. In addition, for the year 2018 analysis year only, emission factor post-processing was used to apply a temperature and humidity adjustment. The temperature and humidity adjustment is based on the fact that higher humidity results in lower NO_x 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 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 1997 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 year 2018 since the calculation for the Motor Vehicle Emissions Budget for this

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

year included the VMEPSs because 2018 was the attainment year for the 1997 8 hour ozone standard.. These VMEPSs represent only 1.55 tpd of NOx emission reductions since we needed to subtract the off-road part that represents 0.70 tpd. Please see table below and Appendix 4.

VMEPSs	NOx benefits (tpd)
Total VMEPSs (On-Road +Non-Road)	2.25
Off-road VMEPSs	0.70
on-road VMEPSs	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, SAFETEA-LU and MAP-21. This program directs funding to projects that contribute to meeting the 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 proposed CMAQ funded projects, please refer to Chapter 3 of H-GAC’s 2013-2016 TIP.

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 SIPs for the 1997 8 hour ozone standard did not use this program as a credit 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), the EPA's MOBILE6.2.03 emission factor model and emission factors post process adjustments (Section 4 and 6), and off-model credits (Section 5). Regional emissions analyses for conformity must contain the following:

1. All regionally-significant projects, regardless of funding source, that are not exempted under 40 CFR §93.126 or §93.127; and,
2. 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 travel demand 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. If the timeframe of the conformity determination has been shortened under paragraph (d) of § 91.106, the last year of the timeframe of the conformity determination must be a horizon year.
5. If a 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, 2015, 2017, 2018, 2025 and 2035 were selected for analysis in this conformity. Emissions calculations in the conformity determination must follow the calculations used in the SIPs. 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. In addition, only for the year 2018, the output from RATEADJV62DK program is fed into RATEADJV62hrDK program and combined with the output from NOXTEMPFACT program which adjust the emissions factors due to temperature and humidity. At this point, the emission factors are ready to combine with the Travel Demand Model output.

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

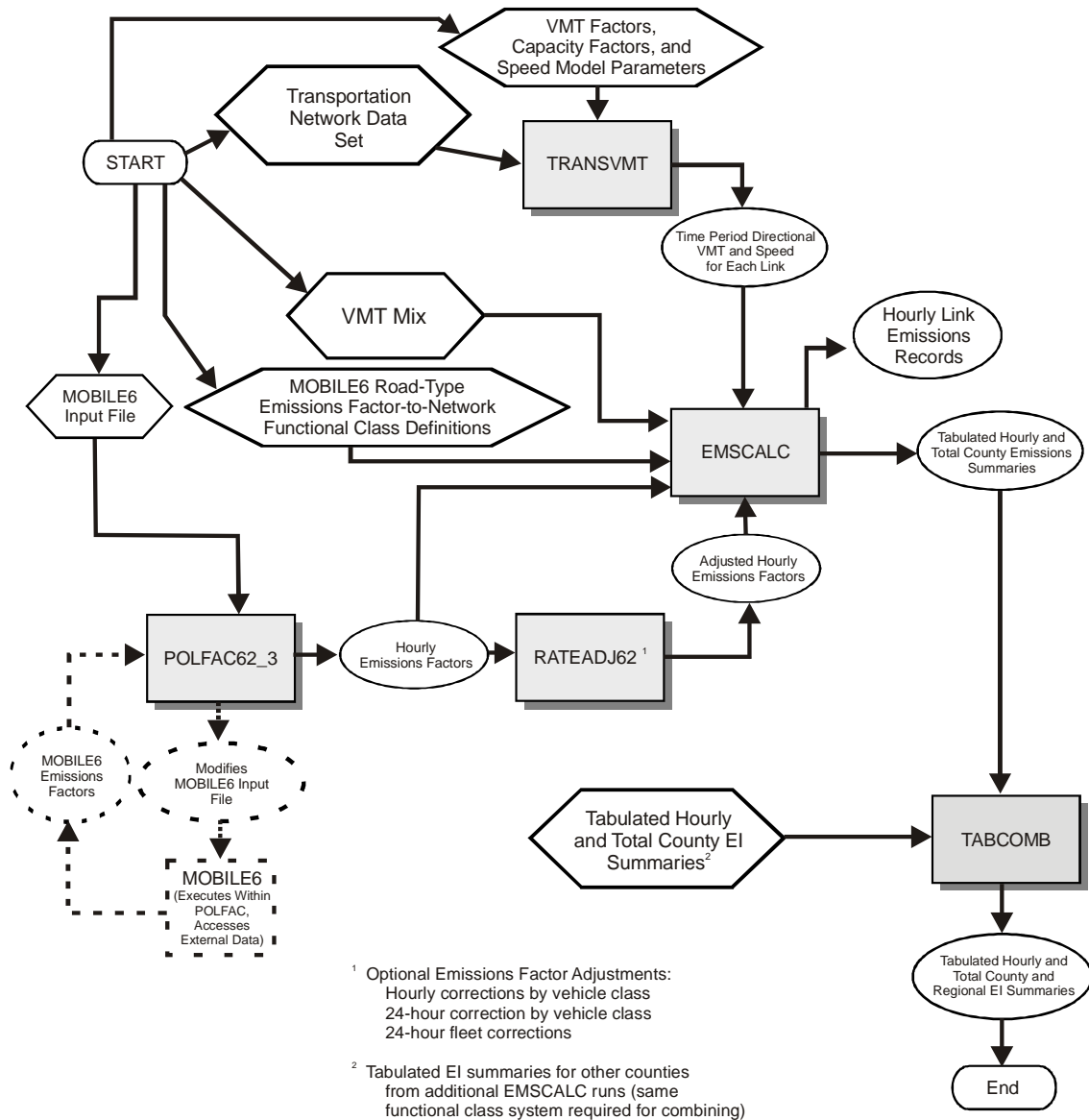


Figure 3: TTI Suite

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 7. These emissions already include the following emission factor adjustments: the May 1st start of the I/M program, the TxLED, the motorcycle rule and the temperature/humidity adjustments. These emissions have another post-processing step before they are final.

Table 7: Link-Based Emissions without Post-Process Off-Model Credits

Years	NOx (tpd)	VOC (tpd)
2011	135.20	74.20
2014	92.19	59.58
2015	80.98	55.63
2017	61.40	48.88
2018	50.43	45.96
2025	33.10	38.31
2035	35.16	45.91

**Per TCEQ request, H-GAC informs that the temperature/humidity correction adjustment for 2018 represents 1.69 tpd of NOx emission reductions. This correction was done as a post-process of the emission factors..*

6.3 Post-Process Off-Model Credits

The post-process adjustments take place after the emissions from the TABCOMB step have been calculated. The post process adjustments were used only for the attainment year 2018 and follow the similar methodology that was developed for the SIP.

Processes	2018	
	NOx (tpd)	VOC (tpd)
Unadjusted	50.43	45.96
VMEP	-1.55	0.00
Final Emissions	48.88	45.96

6.4 Final Emission Analysis Results

Mobile source emissions estimated for the amended 2035 RTP Update, and the 2013-2016 TIP are consistent with the most recent projections of population, employment, travel and congestion available. This conformity determination 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 8, are lower than those estimated for the 1990 base year. Additionally, final VOC and NOx emissions for the years 2011, 2014, 2015, 2017, 2018, 2025 and 2035 are lower than the VOC and NOx budgets established by the SIP. Therefore, the amended 2035 RTP Update, and the 2013-2016 TIP pass all conformity tests required under the EPA's Final Conformity Rule. The transportation improvements in the 2035 RTP Update, and the 2013-2016 TIP conform to both the SIP and the Clean Air Act, as amended.

Table 8: Final Emission Results

Analysis Year	VOC Emissions (tpd)	VOC Budget (tpd)	NOx Emissions (tpd)	NOx Budget (tpd)
2011	74.20	75.17	135.20	135.74
2014	59.58	61.84	92.19	95.26
2015	55.63	61.84	80.98	95.26
2017	48.88	53.23	61.40	67.95
2018	45.96	45.97	48.88	49.22
2025	38.31	45.97	33.10	49.22
2035	45.91	45.97	35.16	49.22

7.0 Interagency Consultation

Interagency review and comment on the conformity determination 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 determination. 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 determination will be distributed to the consultation committee in the form of CDs and also posted on H-GAC's website on March 27, 2013 (http://www.h-gac.com/taq/airquality_model/conformity/2013_phase3/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 27, 2013 and ends on Thursday, April 25, 2013 at 5:00pm. Two public meetings will be held on Tuesday, April 9, 2013, from noon-1:00pm and from 6:00-7:00 pm at H-GAC (3555 Timmons Lane, Houston, Texas).

Due to some changes in our conformity parameters, the public participation was extended for 30 more days, closing on May 23rd. The changes in conformity parameters were the recalculation of the HPMS factor and the 2018 adjustment due to temperature and humidity. Comments received with their responses are in Appendix 16.