

15. PROPOSED RECOMMENDATIONS TO FACILITATE TRANSPORTATION PLANNING AND CONFORMITY PROCESS IMPROVEMENTS

BACKGROUND

There is an ongoing conversation about the resources in time and staff that are dedicated to transportation conformity and transportation project delivery within the region. Many of the difficulties associated with these processes can be traced to federal policies and regulations. In collaboration with Transportation Policy Council member Dr. Shelley Sekula-Gibbs and other stakeholders, Air Quality program staff have drafted a list of policy proposals that may be increase efficiency in transportation planning and programming, pending further exploration. Staff is presenting these draft policies for review and input. Next steps could include sending a letter to relevant federal agency leadership with a request to explore these policy proposals with federal and state partners.

CURRENT SITUATION

These proposals present potential improvements to processes that, if approved, would streamline the transportation planning process and may increase regional control over transportation planning processes involving project planning and the downstream effect related to the transportation conformity process. Draft comments include:

1. Delegate approval of conformity determination for Texas nonattainment regions to the State of Texas via the Texas Department of Transportation.
2. Institute a framework to set a single common review deadline for partners to review and comment on conformity documentation and for MPOs to respond to partner comments.
3. Whenever possible, avoid the use of back-to-back attainment-year analysis years by deferring to the attainment year of the more stringent National Ambient Air Quality Standard for the same pollutant.
4. Review and revise what constitutes as exempt under 40 CFR 93.126, Table 2, and/or as exempt from regional emissions analysis under 40 CFR 93.127, Table 3, and provide maximum flexibility to local MPOs and to State DOTs to determine exemptions in good faith.
5. Provide a glossary or a dictionary to assist project sponsors, MPO staff, and conformity partners at the state and federal levels with writing project descriptions that will pass conformity review.

ACTION REQUESTED

Discussion only.