AIR QUALITY CONFORMITY INTERAGENCY CONSULTATION PROCESS

Connecticut Metropolitan Planning Organizations

June 2010

A Procedural Policy Developed by:

Connecticut Department of Transportation
Census/Modeling Unit

In Cooperation With:

Federal Transit Administration
Federal Highway Administration
United States Environmental Protection Agency
Connecticut Department of Environmental Protection
Connecticut Metropolitan Planning Organizations
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REGULATIONS

Clean Air Act Sections 176 (42 USC 7506)

Title 40 Code of Federal Regulations 51

Title 40 Code of Federal Regulations 93

Title 23 Code of Federal Regulations 450

Title 23 United States Code Part 134 – Metropolitan Planning

Title 23 United States Code Part 135 – Statewide Planning

Title 23 United States Code Part 53 – Mass Transportation

ACRONYMS

AQ  Air Quality
CAA  Clean Air Act
CO  Carbon Monoxide
CFR  Code of Federal Regulations
CTDEP  Connecticut Department of Environmental Protection
CTDOT  Connecticut Department of Transportation
FHWA  Federal Highway Administration
FIP  Federal Implementation Plan
FR  Federal Register
FTA  Federal Transit Administration
IC  Interagency Consultation
ICG  Interagency Consultation Group
LRTP  Long Range Transportation Plan
MPO  Metropolitan Planning Organization
MVEB  Motor Vehicle Emissions Budget
NAAQS  National Ambient Air Quality Standards
NOx  Nitrogen Oxides
PIP  Public Involvement Procedures
PM  Particulate Matter
RPO  Regional Planning Organization
RRPO  Rural Regional Planning Organization
SAFETEA-LU  Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
SIP  State Implementation Plan
STIP  Statewide Transportation Improvement Program
TCM  Transportation Control Measures
TDM  Travel Demand Model
TIP  Transportation Improvement Program
USDOT  United States Department of Transportation
USC  United States Code
USEPA  United States Environmental Protection Agency
VMT  Vehicle Miles of Travel
Transportation Conformity Process and Motor Vehicle Emission Budgets

Transportation conformity is a Clean Air Act (CAA) requirement that serves as a bridge to connect air quality and transportation planning activities. Transportation conformity is required under the CAA to ensure that highway and transit project activities receiving federal funds are consistent with (“conform to”) the purpose of the State Implementation Plan (SIP). Conformity to a SIP is achieved if transportation programs or transit project activities do not cause or contribute to any new air quality violations, do not worsen existing violations, and do not delay timely attainment of the relevant National Ambient Air Quality Standards (NAAQS).

Transportation conformity currently applies to areas that are designated nonattainment for the following transportation-related criteria pollutants: ozone, particulate matter (PM$_{2.5}$ and PM$_{10}$), carbon monoxide (CO), and nitrogen oxides (NOx). Transportation conformity also applies to “maintenance areas,” i.e., areas that have been redesignated to attainment after 1990. Figure 1 is a flowchart depicting the transportation conformity process and how the elements of a Conformity Determination interact, while Figure 2 shows a map of the non-attainment areas in Connecticut and Figure 3 shows the Connecticut’s CO attainment and maintenance areas.

Overview of Transportation Conformity

Transportation conformity addresses air pollution from on-road mobile sources such as cars, trucks, motorcycles, and buses. There are also significant emissions from off-road mobile sources, area sources, and stationary sources that are not addressed by transportation conformity. Transportation conformity budgets are developed by the lead air quality agency, Connecticut Department of Environmental Protection (CTDEP) as part of the attainment planning process, with a goal of ensuring that emissions from the transportation sector are balanced with those from the other source sectors such that NAAQS attainment and maintenance requirements are met in a timely fashion.

The Connecticut Department of Transportation (CTDOT) and the Metropolitan Planning

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1 Refer to latest Conformity Determination reports for current budgets Ct.gov/dot/cwp/view.asp?a=1383&q=431790
2 U.S. Code Title 42 Chapter 85 www.epa.gov/air/CAA
3 www.epa.gov/ne/topics/air/sips.html
4 40 CFR Part 50 www.epa.gov/air/criteria.html
Organizations (MPOs) in Connecticut must demonstrate conformity for all Long Range Transportation Plans (LRTPs) and Transportation Improvement Programs (TIPs). Additionally federally funded or approved highway and transit projects in CO, PM$_{10}$ or PM$_{2.5}$ nonattainment and maintenance areas may be subject to project level conformity.
Figure 1: Transportation Conformity Process

SIP: Emissions Budget, Transportation Control Measures (TCMs), Interagency Consultation

Transportation Plan: Fiscal Constraint Planning Factors, Public Involvement

Perform Regional Analysis of Plan: Emissions Budget or Interim Emissions Tests, Timely Implementation of TCMs

Plan Conformity?

Yes

Transportation Improvement Program (TIP): Fiscal Constraint Planning Factors, Public Involvement

Perform Regional Analysis of TIP: Emissions Budget or Interim Emissions Tests, Timely Implementation of TCMs

TIP Conformity?

Yes

Project

No

Hot Spot Analysis in (in CO & PM$_2.5$ Areas)

Project Conformity?

Yes

Project Approval

Transportation Plan or Project Approval

SIP or Plan Revision Needed

No

SIP Revision Needed?

No

Yes

SIP Revision Needed?

Source: Federal Highway Administration

Denotes key interagency consultation points

Figure 2: Connecticut Ozone Non-Attainment Areas
Figure 3: Connecticut CO Attainment and Maintenance Areas

State of Connecticut Carbon Monoxide Areas

1.) Southwestern Conn. Maintenance
2.) Northwestern Conn. Attainment
3.) New Haven-Meriden-Waterbury Maintenance
4.) Hartford-New Britain- Middletown Maintenance
5.) Eastern Conn. Attainment
Conformity Determinations are developed by CTDOT and the MPOs in consultation with CTDEP and the United States Environmental Protection Agency (US EPA). The Federal Transit Administration (FTA) and the Federal Highway Administration (FHWA) agencies of the United States Department of Transportation (US DOT) review the CTDOT/MPOs submittals and make a Conformity Determination. It is customary that US EPA’s regional office provides US DOT with a letter of comment regarding the Connecticut air quality conformity report submittal.

Conformity Determinations consist of the following components:

- Regional emissions analysis;
- Transportation modeling requirements;
- Latest planning assumptions and emissions model;
- Timely implementation of transportation control measures (TCMs) approved in the SIP;
- Interagency consultation;
- Public participation (consistent with US DOT regulations);
- Fiscal constraint (consistent with US DOT regulations);
- Determination of exempt projects and projects exempt from the air quality analysis; and
- May include Hot-spot air quality analyses.

The regional emissions analysis is the primary component, which incorporates either a “budget” test for areas or states with approved SIP budgets, or an interim emissions test for areas without adequate or approved SIP budgets. Budgets are developed using various transportation and emissions models. Local modeling inputs are cooperatively developed by CTDEP and CTDOT, using US EPA recommended methods where applicable. Generally, CTDOT’s estimated mobile air emissions from the MPOs’ and Rural Regional Planning Organizations (RRPO) LRTPs and MPOs TIPs and the Statewide Transportation Improvement Program (STIP) must not exceed the transportation on-road mobile budgets established by the CTDEP’s Bureau of Air Management, in cooperation with CTDOT and US EPA, as part of the SIP development process.

Requirements

The federal CAA and federal transportation reauthorization legislation passed in the 1990s established an interrelationship of clean air and transportation planning. In order to receive federal transportation funds, CTDOT and the MPOs in Connecticut must cooperatively work to
develop and endorse an Air Quality Conformity Statement, which certifies to the federal
government that all TIPs within the State of Connecticut (which are incorporated into the STIP)
collectively conform to the requirements of the CAA.

Conformity Rule has been amended many times with the current rule found at 40 Code of
Federal Regulation (CFR) 93.100 through 93.129. In 2007, the Safe, Accountable, Flexible,
Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU)\footnote{PL 109-59, August 10, 2005; (Section 6011).} revised the CAA
conformity SIP requirements in order to use state and local resources more efficiently.

The MPOs and CTDOT regularly update the individual regional TIPs and STIP in accordance
with the terms and provisions of SAFETEA-LU, the CAA and all regulations\footnote{70 FR 71950, November 30, 2005.} issued pursuant
thereto. As part of the transportation plan and transportation improvement program
development process, CTDOT and the MPOs conduct air quality assessments and prepare
conformity reports. US EPA, CTDEP, and other stakeholders have the opportunity to evaluate
the transportation planning documents and conformity report prior to the determination of
conformity by the US DOT.

**Frequency of Conformity**

Conformity Determinations for LRTPs, TIP’s and FHWA/FTA projects must be made according
to 40 CFR 93.104. FHWA/FTA must make a Conformity Determination at least every four years
or when LRTPs or TIPs are updated or amended to include or delete non-exempt projects.
Additionally, conformity findings are triggered within twenty-four (24) months of:

- The effective date of US EPA’s finding that Motor Vehicle Emissions Budgets (MVEB)
  from an initially submitted control strategy implementation plan or maintenance plan are
  adequate;
- The effective date of US EPA’s approval of a SIP that creates or revises a budget that
  has not yet been used in a Conformity Determination; and

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\footnote{6 62 FR 43780.} \footnote{7 PL 109-59, August 10, 2005; (Section 6011).} \footnote{8 70 FR 71950, November 30, 2005.}
The effective date of US EPA's promulgation of a Federal Implementation Plan (FIP) which creates or revises a budget.

MPO/RRPO LRTP updates should be provided to the Census/Modeling Unit by the Field Coordination Staff. Any changes or revisions to the TIPs should be provided to the Census/Modeling Unit by the STIP Unit on a routine basis. The timing of the STIP schedule will be determined by CTDOT’s STIP Unit in coordination with the MPOs. Interagency consultation will be used to determine if a conformity determination is triggered, and if triggered whether the current air quality conformity analysis may be used to re-determine conformity.

Whenever an air quality non-exempt project from the LRTP is to be amended into the TIP, a Conformity Determination will be triggered.

Transportation Conformity Process

Project List Review
Each MPO/RRPO will submit their LRTP project list to the CTDOT, Field Coordination Unit. The Field Coordination Unit will forward copies of the lists to the CTDOT Census Modeling Unit. Each MPO will submit their TIP project list to the CTDOT, STIP Unit. The STIP Unit will include all statewide, multi-regional and district projects into one consolidated list. The list will include each project only once and will be forwarded to the Census/Modeling Unit.

The Census/Modeling Unit will provide an Air Quality code for each project and determine the project construction completion date from the available project descriptions and/or the project manager. The project completion date is needed to determine the network year to include the project in the travel modeling process.

The Census/Modeling Unit may determine a project is included in one of the existing categories of exempt projects (see Appendix A and 20 CFR 93.126 Table 2 – Exempt Projects) “Safety”, “Mass Transit”, “Air Quality”, or “Other”. Exempt projects mean that the project is exempt from the requirement to determine transportation conformity and may proceed toward implementation even in the absence of a conforming transportation plan and TIP.

If a project is an amendment to the TIP, the following procedures are to be followed:
• The MPO/RRPO submits any new projects to the STIP Unit for Air Quality review.

• The STIP unit will forward all MPO/RRPO projects and state sponsored projects to Census/Modeling Unit for initial Air Quality review.

• If a project is determined to be “exempt”, by the list in 93.126, 93.127 and 93.128, it will not trigger the need for a new Air Quality conformity determination. Section 93.105 (c)(1)(iii) of the interagency consultation provisions of the Transportation Conformity Rule requires the evaluation of “exempt” projects to see if they are truly exempt or if in this case should be evaluated in the air quality conformity analysis. “Evaluating whether projects otherwise exempted from meeting the requirements of this subpart (see §§93.126 and 93.127) should be treated as non-exempt in cases where potential adverse emissions impacts may exist for any reason”. Exempt projects can be added to the MPO TIP and CTDOT can add the exempt project to the STIP.

• If a project is deemed to be “not regionally significant”, an interagency consultation meeting is necessary for concurrence by all participants. Each MPO shall reaffirm the latest Air Quality Conformity Report at their next Policy Board meeting and then add the project to their TIP. A resolution stating concurrence must be provided to CTDOT. CTDOT will coordinate the STIP approval.

• If a project is deemed to be “non-exempt”, the interagency consultation process must be followed including an Interagency Consultation meeting, MPO concurrence of air quality project coding, preparation of a new Air Quality Transportation Conformity Determination report, public review and comment period, and MPO resolution by the Policy Board. The MPO may add this project to their TIP upon their approval of the new Air Quality Conformity Determination. A resolution stating concurrence must be provided to CTDOT. CTDOT will coordinate the STIP approval.

Figure 4, on the next page, shows the MPO action needed for Air Quality Conformity.
Figure 4: Project Conformity Determination Requirements

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<th>Reaffirm Current Emission Analysis</th>
<th>New Model</th>
<th>MPO Resolution Needed</th>
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<td>Not Regionally Significant</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-Exempt Project</td>
<td></td>
<td>X</td>
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**Interagency Consultation Group Meeting**

The ICG meeting should include, but not be limited to: MPO/RRPOs, CTDEP, CTDOT, FHWA, FTA and US EPA. The list of not regionally significant and non-exempt projects will be provided to the ICG one week prior to the scheduled ICG meeting. Participants will provide comments on regional significance and exempt status. If comments are received, the appropriate MPO, or CTDOT, if applicable, will provide a response. In the case of a new STIP, all projects will be submitted for review.

CTDOT will schedule an ICG meeting with a conference call option, to discuss the following pre-analysis items, as well as any AQ coding issues:

- LRTP horizon years
- AQ Conformity analysis years
- Motor Vehicle Emissions Budgets
- Latest planning assumptions
- Latest available emissions model
- Schedule milestone dates:
  - submittal of LRTP projects to Field Coordination Staff
  - submittal of TIP projects to STIP Staff
  - projects forwarded to Census/Modeling Unit
  - start of AQ conformity analysis by Census / Modeling Unit
  - MPO 30 day public review of draft plan and AQ analysis
• Latest possible date for MPO endorsement of the final Conformity Determination plan and AQ conformity resolution to CT DOT and FHWA.
  • AQ Conformity test (if applicable)
  • Validation (baseline) year

An email concurrence of the AQ codes and planning assumptions discussed at the Interagency Consultation Meeting shall be submitted to the CTDOT by all MPOs. The CTDOT will schedule a meeting, with a conference call option, to be held within 10 days in order to discuss any unresolved issues from the previous ICG meeting, if applicable. All decisions from the meeting shall be referenced by the CTDOT for inclusion in the AQ Conformity Determination report.

Transportation Modeling
Once the STIP Unit has a complete list of projects and the Census/Modeling Unit has reviewed the MPO/RRPOs’ LRTPs for projects, CTDOT’s Census/Modeling Unit updates/revises their highway and transit networks to incorporate the LRTP/TIP projects. The Census/Modeling Unit will then run the statewide travel model for all modeling years agreed upon at the initial ICG meeting. Speed and Vehicle Miles of Travel (VMT) data will be used to develop the emission factors using the US EPA approved emissions model agreed to through interagency consultation.

Emissions Estimation
The emission factors derived from the emission model will be used to estimate vehicle emissions. These estimated vehicle emissions are compared to the Motor Vehicle Emissions Budgets (MVEB) in the SIP or interim emission test if there is no MVEB available for the non-attainment/maintenance area. If the estimated emissions are equal to or less than the MVEB, then CTDOT can proceed with the AQ Conformity Determination report. If the estimated emissions are greater than the MVEB, then the MPO/CTDOT will need to revise the project list and then go back through the travel demand modeling and emissions factors development process.
Preparation of AQ Conformity Determination Report
CTDOT’s Census/Modeling Unit will prepare the AQ Conformity Determination Report for the non-attainment/maintenance area(s). Depending upon the location of project additions or revisions, an Ozone and/or Particular Matter (PM$_{2.5}$, PM$_{10}$ and precursors) Report will be prepared. If in the future, additional areas of the State are determined to be in non-attainment for other pollutants, this process will be followed.

AQ Conformity Determination Report Review
Upon completion, the Census/Modeling Unit will distribute an electronic copy of the AQ Conformity report(s) to all MPO/RRPO’s, CTDEP, FHWA, FTA and US EPA for their review and comment. An electronic version will also be posted on the CT DOT website. The reports will be in electronic format per Governor Rell’s Executive Directive Number #3. The review period is 30 days. This is a critical juncture in the process to address and resolve any major AQ conformity issues. The MPO/RRPO/CTDOT will provide responses to all comments.

Public Review and Comment Period
Each MPO will follow their public involvement procedures to notify the public that a new AQ Conformity Analysis has been prepared. This document will be made available for a 30-day comment period, and a public meeting on this document will be held in conjunction with the public meeting on the MPO’s TIP and/or LRTP. Copies of pertinent transportation and air quality documents will be made available in the MPO/RRPO’s office for review by the general public. The public may also attend an MPO/RRPO’s monthly meeting to deliver comments on the AQ Conformity Determination. All comments received on an AQ Conformity document will be incorporated by reference in the MPO’s approval submittal to the CTDOT who, in turn, will forward to FHWA and FTA.

Respond to Public Comments
MPO’s/CTDOT should address ALL public comments. These responses should be documented and will be included in the final AQ Conformity report if applicable. Written responses will be provided for comments including non-Federally funded or approved projects and their emissions which are reflected in the regional analysis supporting the AQ Conformity Determination.
MPO Policy Board Approve/Adopt Conformity Determination Report

Each MPO Policy Board approves and adopts the Conformity Determination report and the LRTP/TIP. These resolutions need to be documented and sent to CTDOT STIP (TIP amendments) or Field Coordination Unit (LRTP submittals). The appropriate CTDOT unit will forward these resolutions to FHWA, FTA and EPA for final AQ Conformity Determination.

Amendments to the STIP for non-exempt projects will require a public comment period and a resolution from the MPOs affected by the amendments. Adding or deleting non-exempt projects for the STIP may trigger the need for a new Conformity Determination. Each MPO must make a positive conformity determination for its LRTP and/or TIP in combination with any and all LRTP/TIPs in the nonattainment/maintenance area before the LRTP/TIP may be approved.

The entire conformity review and public comment process should be completed within 30 days.

Federal Review Process

CTDOT’s Census/Modeling Unit submits the AQ Conformity Determination Report to US EPA, FHWA and FTA for a 30 day Federal review period. US EPA submits a review and comment letter to FHWA and FTA. FHWA and FTA submit a joint letter for the US DOT AQ Conformity Determination.

The date of the US DOT AQ Conformity Determination letter starts the four-year clock for the next LRTP and TIP AQ Conformity Determinations. An AQ Conformity Determination relying on previous air quality analysis (in accordance with Section 93.122(g) of the Transportation Conformity Rule) does not re-start the four-year clock.

In the future, if additional areas of the State are determined to be in non-attainment for other pollutants, this process will be followed.

A list of Agency Roles and Responsibilities is provided in Appendix B. Appendix C provides a list of the Regional Planning Organizations, as well as agency address and contact persons. Appendix D lists Planning Assumptions to be discussed at the initial ICG meeting and lists the agency responsible for updating/revising data.
APPENDIX A
Transportation Projects Exempt from Travel Modeling, Emission Analysis and AQ Conformity Determinations

Exempt Projects under 40 CFR 93.126 - (X6)

Safety
1. Railroad/highway crossing
2. Projects that correct, improve, or eliminate a hazardous location or feature
3. Safer non-Federal–aid system roads
4. Shoulder improvements
5. Increasing sight distance
6. Highway Safety Improvement Program implementation
7. Traffic control devices and operating assistance other than signalization projects
8. Railroad/highway crossing warning devices
9. Guardrails, median barriers, crash cushions
10. Pavement resurfacing and/or rehabilitation
11. Pavement marking
12. Emergency relief (23 U.S.C. 125)
13. Fencing
14. Skid treatments
15. Safety roadside rest areas
16. Adding medians
17. Truck climbing lanes outside the urbanized area
18. Lighting improvements
19. Widening narrow pavements or reconstructing bridges (no additional travel lanes)
20. Emergency truck pullovers

Mass Transit
21. Operating assistance to transit agencies
22. Purchase of support vehicles
23. Rehabilitation of transit vehicles
24. Purchase of office, shop and operating equipment for existing facilities

\[NOTE: \text{in PM}_{10} \text{ and PM}_{2.5} \text{ nonattainment or maintenance areas, such projects are exempt only if they are in compliance with control measures in the applicable implementation plan}\]
25. Purchase of operating equipment for vehicles (e.g. radios, fareboxes, lifts, etc.)
26. Construction or renovation of power, signal and communications systems
27. Construction of small passenger shelters and information kiosks
28. Reconstruction or renovation of transit buildings and structures (e.g. rail or bus buildings, storage and maintenance facilities, stations, terminals and ancillary structures)
29. Rehabilitation or reconstructions of track structures, track and trackbed in existing rights-of-way
30. Purchase of new buses and rail cars to replace existing vehicles or for minor expansions of the fleet
31. Construction of new bus or rail storage/maintenance facilities, categorically excluded in 23 CFR part 771

Air Quality
32. Continuation of ride-sharing and van-pooling promotion activities at current levels
33. Bicycle and pedestrian facilities

Other
34. Specific activities which do not involve or lead directly to construction, such as:
   a. Planning and technical studies
   b. Grants for training and research programs
   c. Planning activities conducted pursuant to titles 23 and 49 U.S.C.
   d. Federal-aid systems revisions
35. Engineering to assess social, economic and environmental effects of the proposed action or alternatives to that action
36. Noise attenuation
37. Emergency or hardship advance land acquisition (23 CFR 710.503)
38. Acquisition of scenic easements
39. Plantings, landscaping, etc
40. Sign removal
41. Directional and informational signs
42. Transportation enhancement activities (except rehabilitation and operation of historic transportation buildings, structures, or facilities)
43. Repair of damage caused by natural disasters, civil unrest, or terrorist acts, except projects involving substantial functional, locational or capacity changes
Projects Exempt From Regional Emissions Analyses\textsuperscript{10}

40 CFR 93.127 - (X7)

1. Intersection channelization projects
2. Intersection signalization projects at individual intersections
3. Interchange reconfiguration projects
4. Changes in vertical and horizontal alignment
5. Truck size and weight inspection stations
6. Bus terminals and transfer points

Traffic Signal Synchronization Projects\textsuperscript{11}

40 CFR 93.128 - (X8)

Traffic signal synchronization projects may be approved, funded, and implemented without satisfying the requirements of this subpart. However, all subsequent regional emissions analyses required by §§93.118 and 93.119 for transportation plans, TIPs, or projects not from a conforming plan and TIP must include such regionally significant traffic signal synchronization projects.

\textsuperscript{10} Action in this category are not exempt from regional emissions analysis if the MPO in conjunction with other agencies and the FHWA or the FTA concur that it has potential regional impacts for any reason. 40 CFR 93.127 Chapter 1, page 572.

\textsuperscript{11} 40 CFR 93.128
Agency Roles and Responsibilities

Metropolitan Planning Organizations (MPO)

- Update the LRTPs
- Participate in AQ Interagency Consultation Group (ICG) meetings for AQ Conformity Determinations for LRTP and TIP
- Review and comment on AQ analysis and documentation
- Assist with responses to agency/public comments
- Coordinate 30 day public involvement comment period and public meeting in conjunction with the public meeting on MPO’s TIP and/or LRTP for their MPO for all AQ Conformity Determinations in the PM$_{2.5}$ and Ozone non-attainment areas, as well as any PM$_{10}$, PM$_{2.5}$, CO or Ozone maintenance areas, as required.
- Maintain an electronic copy of AQ Conformity Determination report in MPO’s office for review by the general public, an electronic copy of which will be provided by CTDOT.
- Transportation Policy Boards approve and adopt the LRTP/TIPs and the Air Quality Conformity Determinations in the PM$_{2.5}$ and Ozone non-attainment areas and PM$_{10}$, PM$_{2.5}$, CO or Ozone maintenance areas, as necessary
- Incorporate by reference all AQ Conformity report comments from the public in the MPO’s approval submittal to CTDOT
- Provide the CTDOT with copies of the MPO’s LRTP/TIPs and their approval of the Air Quality Conformity
- Consult on emissions analysis for transportation activities which cross the borders of MPOs or nonattainment areas or air basins
- Review project air quality codes in the STIP and submit written concurrence of air quality codes to CTDOT

Rural Regional Planning Organizations (RRPO)

- Update the LRTPs
- Participate in AQ ICG meetings for AQ Conformity Determinations for LRTP and STIP
- Review and comment on AQ Conformity analysis and documentation
- Assist with responses to agency/public comment
- Coordinate 30 day public involvement comment period and public meeting on the LRTP.
Transportation Policy Boards approve and adopt the LRTP and reviews their portion of the STIP.

Provide the CTDOT with copies of their LRTP and comments on the STIP.

Review project air quality codes in the STIP and submit written concurrence of air quality codes to CTDOT

**Connecticut Department of Transportation**

- Assist CTDEP in development of motor vehicle emissions budgets
- Develop emissions factors using latest emission software model
- Run statewide travel demand model (TDM)
- Maintain and manage AQ conformity process schedule
- Monitor MPO conformity process schedule
- Schedule/coordinate/facilitate ICG meetings
- Prepare the AQ Conformity Determination Report
- Prepare draft AQ conformity statement for MPO use
- Collect concurrence forms on AQ code review from MPO/RRPOs
- Schedule conference call within two weeks to discuss any unresolved issues that may arise from the ICG meeting
- Forward approved TIPs, STIP and Air Quality Conformity reports to FHWA, FTA and EPA
- Forward all comments on the AQ Conformity reports from the public to FHWA, FTA and EPA
- Consult on emissions analysis for transportation activities which cross the borders of MPOs or nonattainment areas or air basins.
- Facilitate a process to ensure that plans for construction of regionally significant projects which are not FHWA/FTA projects (including projects for which alternative locations, design concept and scope, or the no-build option are still being considered), including those by recipients of funds designated under Title 23 of the United States Code (USC) or the Federal Transit Laws, are disclosed to the MPO on a regular basis, and to ensure that any changes to those plans are immediately disclosed.
- Notify MPO/RRPO of change in non-attainment designation.
Connecticut Department of Environmental Protection

- Assist in development of motor vehicle emissions budgets
- Create and develop the SIP
- Report on the designation of new nonattainment areas in Connecticut, as well as reclassification of nonattainment areas to attainment with maintenance plans in place.
- Review Conformity Determination report and comments
- Assist in evaluation of latest planning assumptions
- Provide a list of SIP TCMs if applicable at the Interagency Consultation Group Meeting
- Evaluate and choose a model (or models) and associated methods and assumptions to be used in hot-spot analyses and regional emissions analyses
- Evaluate whether projects otherwise exempted from meeting the requirements of this subpart (see Appendix A, §§93.126 and 93.127) should be treated as non-exempt in cases where potential adverse emissions impacts may exist for any reason
- Make a determination whether past obstacles to implementation of TCMs which are behind the schedule established in the applicable implementation plan have been identified and are being overcome, and whether State and local agencies with influence over approvals or funding for TCMs are giving maximum priority to approval or funding for TCMs. This process shall also consider whether delays in TCM implementation necessitate revisions to the applicable implementation plan to remove TCMs or substitute TCMs or other emission reduction measures;
- Consult on emissions analysis for transportation activities which cross the borders of MPOs or nonattainment areas or air basins.

Federal Highway Administration (FHWA)

- Participate in ICG meetings
- Coordinate federal review process of the AQ Conformity Determination
- Provide the CTDOT with technical guidance and advice on AQ Conformity
- Review AQ Conformity Determination report
- Co-sign US DOT AQ Conformity Determination letter
Federal Transit Administration (FTA)
- Participate in ICG meetings
- Coordinate federal review process of the AQ Conformity Determination
- Provide the CTDOT with technical guidance and advice on AQ Conformity
- Review AQ Conformity Determination report
- Co-Sign US DOT AQ Conformity Determination letter

United States Environmental Protection Agency (US EPA)
- Promulgate AQ Conformity regulations
- Approve the SIP
- Participate in ICG meetings
- Provide technical advice and guidance on AQ Conformity
- Review AQ Conformity Determination
- Prepare and forward an AQ Conformity Evaluation memo to FHWA/FTA as appropriate
<table>
<thead>
<tr>
<th>Region</th>
<th>Director</th>
<th>Phone #</th>
<th>Office Hours</th>
<th>Planners</th>
<th>PHWA Liaison</th>
<th>CT DOT Liaison</th>
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<tr>
<td>1. Capital Region Council of Governments</td>
<td>Lyne Babson</td>
<td>860-222-2217</td>
<td>M-F 8:30AM-5:00PM</td>
<td>Jennifer Carver</td>
<td>Steve Cooper</td>
<td>Stephen Wright</td>
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<tr>
<td>3. Connecticut River Valley Regional Planning Agency</td>
<td>Linda Kinslow</td>
<td>860-395-1404</td>
<td>M-F 8:00AM-5:00PM</td>
<td>Jade Davis</td>
<td>Elvis Powell</td>
<td>Stephen Livengood</td>
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<td>4. Council of Governments of the Naugatuck Valley</td>
<td>Peter Compean</td>
<td>860-755-0400</td>
<td>M-F 8:30AM-4:30PM</td>
<td>Samuel Segal</td>
<td>Steve Cooper</td>
<td>Stephen Livengood</td>
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<tr>
<td>5. Greater Bridgeport Regional Planning Agency</td>
<td>Mark Hain</td>
<td>203-503-4902</td>
<td>M-F 8:30AM-4:30PM</td>
<td>Brian Bush</td>
<td>Ken Shooster-Stalker</td>
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<tr>
<td>6. Housatonic Valley Council of Electors</td>
<td>Jonathan Crew</td>
<td>413-404-1401</td>
<td>M-F 8:30AM-4:30PM</td>
<td>Dave Harmon</td>
<td>Ken Shooster-Stalker</td>
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<td>8. South Central Regional Council of Governments</td>
<td>Carl Amore</td>
<td>860-794-3020</td>
<td>M-F 8:30AM-5:00PM</td>
<td>James Reza</td>
<td>Ken Shooster-Stalker</td>
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<td>9. Southwestern Connecticut Council of Governments</td>
<td>Dr. Floyd, A.P.</td>
<td>860-544-2400</td>
<td>M-F 8:30AM-5:00PM</td>
<td>Susan Prose</td>
<td>Ken Shooster-Stalker</td>
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**RURAL REGIONAL PLANNING ORGANIZATIONS**

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<tr>
<th>Region</th>
<th>Director</th>
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## PLANNING ASSUMPTIONS

<table>
<thead>
<tr>
<th>Planning Assumptions for Review</th>
<th>Frequency of Review*</th>
<th>Responsible Agency</th>
<th>Date of Last Review</th>
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<tr>
<td>Socioeconomic Data</td>
<td>At least every 5 years</td>
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<tr>
<td>DMV Vehicle Registration Data</td>
<td>At least every 5 years</td>
<td>CTDEP</td>
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<td>State Vehicle Inspection and Maintenance Program</td>
<td>Each conformity round</td>
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<tr>
<td>State Low Emission Vehicle Program</td>
<td>Each conformity round following approval into the SIP</td>
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<td>VMT Mix Data</td>
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<tr>
<td>Analysis Years</td>
<td>Each conformity round</td>
<td>CTDOT/CTDEP</td>
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<tr>
<td>Emission Budget</td>
<td>As SIP revised/updated</td>
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<tr>
<td>Free-Flow Vehicle Speeds</td>
<td>At least every 5 years</td>
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<tr>
<td>Temperatures and Humidity</td>
<td>As SIP revised/updated</td>
<td>CTDEP</td>
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<tr>
<td>Control Strategies</td>
<td>Each conformity round</td>
<td>CTDEP</td>
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<tr>
<td>Off-Line Calculations</td>
<td>Each conformity round</td>
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<td>Model Calibration</td>
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<tr>
<td>VMT</td>
<td>Each conformity round</td>
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* Review of Planning Assumptions does not necessarily prelude an update or calibration of the travel demand model.