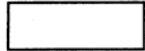




Chicago Area Transportation Study



To: CATS Policy Committee
From: Patricia Berry, Acting Deputy for Programming
Date: September 15, 2005
Subject: Public Comments on *Transportation Conformity Analysis for the PM_{2.5} and 8-Hour Ozone National Ambient Air Quality Standards*

The following is a summary of the comments received on the proposed revision to the transportation conformity analysis for the PM_{2.5} and 8-hour ozone National Ambient Air Quality Standards and staff notes on those comments. One comment was received. A copy of the comment is attached.

In addition, one question was raised at the August 12, 2005 Work Program Committee meeting. The staff review and response to the question is included here.

Finally, one numeric error was noted in the calculations. The corrected value is given here; the correction does not affect the conformity analysis and determination.

McHenry County

McHenry County wrote a comment suggesting that further project detail be given in the document to allow implementers to determine that individual projects have been modeled correctly.

- Implementers submit modeled project information as part of the Plan and TIP development process. After the data have been reviewed by CATS staff and prepared for network modeling, the data are sent back to implementers for confirmation. This process has been found to work well in assuring the accuracy of model results.

Question at Work Program Committee Meeting

Jan Metzger of the Center for Neighborhood Technology asked about the impact of the newly-enacted changes in the Inspection and Maintenance Program.

- This question was not submitted as a comment. In addition, since the changes to the Inspection and Maintenance program were not signed into law

at the time the conformity analysis was begun, the changes technically are not part of the latest planning assumptions.

Nonetheless, the impact of the change was assessed. IEPA staff developed a new definition file for the I&M program, which has been added to Appendix B of the documentation. CATS staff then reran MOBILE6 to generate new emission rates.

Since direct PM_{2.5} emissions are not sensitive to inspection programs, these MOBILE6 runs were not redone. In addition, the MOBILE6 runs for non-I&M NO_x were unaffected, so they were not redone. Finally, since the fleet mix data only reflect vehicle ages up to 25 years, all vehicles in the 2020 and 2030 analysis years are from 1996 or later. Since the I&M program is not changing for 1996 or later vehicles, the I&M runs for these years were not redone either.

Thus the only MOBILE6 runs that were affected and redone were the twelve monthly runs for NO_x for I&M vehicles for 2010.

The NO_x emissions for 2010 increased from 69,699.44 tons annually in the draft released for public comment to 69,978.38 tons annually. Since the 2002 NO_x emissions are estimated to have been 167,630.81 tons annually, the 2010 NO_x emissions are less than the 2002 emissions, and the plan and TIP still demonstrate conformity.

Computation Correction

In the process of reviewing the data, it was discovered that the 2020 analysis for direct PM_{2.5} emissions did not account for February 29th. The NO_x emissions analysis did include February 29th.

The addition of February 29th increased the 2020 VMT shown in Table 2 of the conformity document from 69,479,820,383 to 69,658,788,115. Direct PM_{2.5} emissions increased from 1,057.53 tons annually to 1,060.28 tons annually. Since the 2010 direct PM_{2.5} emissions are still less than the 2002 emissions of 3,070.78 tons annually, the plan and TIP still demonstrate conformity.