

Albany-Schenectady-Troy 8-Hour Ozone Non-Attainment Area Transportation/Air Quality Conformity Determination

**Capital District Transportation Committee (CDTC)
2007-2012 TIP and 2030 *New Visions* Transportation Plan**

**Adirondack/Glens Falls Transportation Council (A/GFTC)
2007-2012 TIP and 2025 Long Range Plan**

**12 Year Capital Program of Transportation Projects
for Montgomery, Greene, and Schoharie Counties**

Prepared by:

NYS DOT Environmental Analysis Bureau, CDTC, and A/GFTC

in association with

NYS DOT Regions 1, 2, and 9

DRAFT FOR INTERAGENCY AND PUBLIC REVIEW

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**Capital District
Air Quality Conformity Determination**

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TRANSPORTATION / AIR QUALITY CONFORMITY DETERMINATION FOR THE ALBANY-SCHENECTADY-TROY 8-HOUR OZONE NON-ATTAINMENT AREA

**For the Capital District Transportation Committee (CDTC) 2007-2012 TIP
and 2030 *New Visions* Transportation Plan, the Adirondack/Glens Falls
Transportation Council (A/GFTC) 2007-2012 TIP and 2025 Long Range Plan,
and the 2007-2019 Capital Program of Transportation Projects
in Montgomery, Greene, and Schoharie Counties**

Introduction

The CDTC has developed a new regional transportation plan, the New Visions 2030. Approving a new Regional transportation plan requires updating the conformity analysis that was approved by CDTC on June 7, 2007 and is currently pending FHWA/FTA approval, submitted to FHWA on September 17, 2007. No projects have changed since the last conformity analysis, but a new analysis year has been added (2030) to reflect the horizon year of the new Plan.

The Clean Air Act requires the United States Environmental Protection Agency to establish the national ambient air quality standards (NAAQS) for various criteria air pollutants. Areas where air quality monitoring shows a violation of the NAAQS are designated “non-attainment.” By law the New York State Department of Environmental Conservation (NYSDEC) is required to produce a plan, known as the *State Implementation Plan (SIP)* that details how sufficient emission reductions, including reductions in the mobile source sector, will be achieved to meet the NAAQS.

All non-attainment areas are subject to a provision in CAA §176(c) known as *transportation conformity*. The intent of the transportation conformity process is to fully coordinate transportation and air quality planning to ensure the implementation of Transportation Plans, Programs and Projects will not 1) cause or contribute to any new violation of the NAAQS, 2) increase the frequency or severity of any existing NAAQS violations, or 3) delay timely attainment of the NAAQS or any required interim emissions reductions or other milestones in any area.

This report presents the results of the regional emissions analysis and describes the process and methods undertaken by A/GFTC, CDTC and the New York State Department of Transportation Regions 1, 2, and 9 to demonstrate air quality conformity for the entire seven county non-attainment area.

Attainment / Non-Attainment Status

In accordance with the Clean Air Act Amendments of 1990, the U.S. Environmental Protection Agency (EPA) designated Albany, Schenectady, Saratoga, Rensselaer, Montgomery, and Greene Counties as Marginal non-attainment for the 1-hour ozone standard in 1991. The area was classified as

attainment for all other applicable national ambient air quality standards. An area is defined as marginal non-attainment for the 1-hour ozone standard when the area's monitored design value (i.e. the fourth highest daily 1-hour maximum value during the previous three year period) is between 0.121 parts per million (ppm) and 0.138 ppm. The Albany-Schenectady-Troy area has not experienced a monitored violation of the 1-hour ozone standard since 1989 and the current design value for 1-hour ozone in this area is 0.115 ppm.

On July 16, 1997 EPA concluded the 1-hour standard did not adequately protect the public from the adverse health effects of ground level ozone. In establishing the new 8-hour standard, EPA set the standard at 0.08 parts per million (ppm) and defined the new standard as a "concentration-based" form. Specifically, the design value for 8-hour ozone is the 3-year average of the annual 4th-highest daily maximum 8-hour ozone concentrations. An area will attain the standard when the 3-year average of the annual 4th-highest daily maximum 8-hour concentrations is less than or equal to 0.08 ppm.

Effective June 15, 2004 the United States Environmental Protection Agency (EPA) classified Saratoga, Schenectady, Albany, Rensselaer, Montgomery, Greene, and Schoharie Counties as a Clean Air Act Subpart 1 Basic non-attainment area for the 8-hour ozone standard. This designation was based on the results of ambient air monitoring data collected by the New York State Department of Environmental Conservation from 2001-2003. This data established an 8-hour ozone "design value" of 0.087 ppm for the area. Based on monitoring data for the period 2004-2006, the 8-hour ozone design value for the area is 0.076 ppm.

On June 15, 2005, the one-hour ozone standard was revoked. At that time, EPA determined that upon the revocation of the one-hour standard, only the 8-hour ozone standard and its associated requirements would apply to the transportation conformity process.

On December 22, 2006, the U.S. Court of Appeals for the District of Columbia Circuit both upheld and rejected certain aspects of EPA's framework for implementing the State Implementation Plan (SIP) requirements under Clean Air Act (CAA) Title I Part D for 8-hour ozone non-attainment areas. A key result of the court decision involved the continued implementation of emission control strategies in areas like Erie and Niagara Counties that were previously designated non-attainment for the 1-hour ozone standard under CAA Part D Subpart II and are now designated non-attainment for the 8-hour ozone standard under CAA Part D Subpart I.

Generally speaking, SIP requirements under Subpart I are less stringent than those under Subpart II. The "anti-backsliding" provision, CAA Section 172(e), provides that in the event "[EPA] relaxes a [primary National Ambient Air Quality Standard] after November 15, 1990, [EPA] shall...provide for controls applicable to areas designated non-attainment before such relaxation."

In the subject court case, the DC Circuit specifically concluded that transportation conformity requirements for areas designated non-attainment for the 1-hour ozone standard under Subpart II constitute "controls" under Section 172(e). The DC Circuit Court decision states that "EPA is required by statute to keep in place measures intended to constrain ozone levels – even ones that apply to outdated standards – in order to prevent backsliding."

Therefore, the transportation conformity requirements that previously applied to 1-hour ozone non-attainment areas such as the Albany-Schenectady-Troy 1-hour ozone non-attainment area may remain

“applicable requirements.” Therefore, this conformity determination and associated analyses address the transportation conformity requirements that apply to both the six county Albany-Schenectady-Troy Marginal 1-hour ozone areas and to the seven county Albany-Schenectady-Troy Subpart 1 (Basic) 8-hour ozone non-attainment area per 40 CFR Part 93 and 6 NYCRR Part 240.

Emissions Test for Transportation Conformity

A motor vehicle emissions budget (MVEB) is not required in the State Implementation Plan (SIP) for marginal 1-hour ozone non-attainment areas. A MVEB has not been established as part of the applicable SIP for the 8 hour ozone standard. Per 40 CFR 93.119(b)(2) of the new federal transportation conformity regulation, marginal 1-hour and basic subpart 1 8-hour non-attainment areas may choose between two interim emissions reductions tests to demonstrate conformity.

40 CFR Part 93.119(b)(2)(i) allows Marginal 1-hour and Basic Subpart 1 8-hour ozone non-attainment areas to demonstrate conformity when emissions predicted in the “action” scenario are not greater than emissions predicted in the “baseline” scenario, and this can be reasonably expected to be true in the periods between analysis years. This test is also referred to as the “build-no-greater-than-no-build” test. 40 CFR Part 93.119(b)(2)(ii) allows marginal 1-hour areas to demonstrate conformity when the “action” scenario emissions are less or equal to than 1990 emissions, and allows 8-hour areas to demonstrate conformity when the “action” scenario emissions are less than or equal to 2002 emissions. These tests are commonly referred to as the “no-greater-than-baseline year” emissions tests.

For this conformity determination, the build-no-greater-than-no-build emissions test has been utilized to demonstrate conformity for both the 1-hour and 8-hour Albany-Schenectady-Troy non-attainment areas per 40 CFR Part 93.119(b)(2)(i). To meet the requirements under 40 CFR Part 93.109(c)(4)(i), the ozone precursors volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are examined in the regional emissions analysis.

Use of Latest Planning Assumptions

CDTC’s Systematic Traffic Evaluation and Planning (STEP) travel demand model network includes the Town of Moreau, Saratoga County which is within the A/GFTC planning boundary. Therefore, CDTC’s analysis appropriately incorporates the 2007-2012 A/GFTC TIP and 2025 Long Range Plan into the regional emissions analysis for the Albany-Schenectady-Troy non-attainment area. The A/GFTC TIP and Plan include no non-exempt transportation projects in the Town of Moreau.

In addition, there have been no significant changes to the NYSDOT Capital Program of Projects in Greene, Montgomery, and Schoharie Counties.

The regional emissions analysis is based upon the latest planning assumptions in place at the time the analysis began (August 31, 2007) as described below.

1. Estimates of current and future population employment, travel and congestion

After the adoption of the New Visions 2021 plan in October 2000, CDTC received results from the 2000 Census. The basic 2000 Census population and household values have proved to be remarkably consistent with forecasts prepared by the Capital District Regional Planning Commission (CDRPC) and used by CDTC in the 2021 plan. CDTC commissioned CDRPC to produce new growth forecasts consistent with the 2000 Census. The new forecasts, going out to 2040, re-affirm previous forecasts with the continued forecast for a slow population growth and a slowing of the rate in outer years. The rate of population growth forecast to 2030 and beyond remains essentially the same as the rate used in the 2021 plan. Similarly, analysis of journey-to-work data from the 2000 Census is consistent with prior work.

Regarding travel growth, CDTC continues to use NYSDOT Region 1 annual estimates of average daily state-system vehicle miles of travel (VMT) to monitor the validity of *New Visions* traffic growth assumptions, and the plausibility of achieving the plan's objective of tempering the rate of growth in vehicular traffic. To date, the data support CDTC's New Visions long-range traffic forecasts. *Appendix F* includes a comparison of forecast and actual traffic growth in the region.

All traffic data used for the analysis one non-exempt project in Montgomery County was developed by NYSDOT Region 2 and Environmental Analysis Bureau staff. These estimates are consistent with data in the 2006 NYSDOT Traffic Volume Report.

2. Transit Operating Policies and Ridership Trends

Year 2000 Census results showed the transit share of regional journey to work trips is at 3.4%. This percentage is consistent with CDTC's regional travel demand model, the CDTC STEP Model. Although CDTC has used its Mode Choice Model to evaluate different transit investment scenarios, the STEP Model is based on vehicle trips and implicitly estimates transit ridership in its trip generation forecasts. For future forecasts, the STEP Model assumes that transit fares will stay at current values after adjusting for inflation. It is assumed that under the implementation of the New Visions Plan, transportation and land use actions called for in the Plan will result in stable transit ridership. Under trend conditions, without the New Visions Plan, it is assumed that ridership will decrease by roughly ten percent.

3. Transit service and fare changes, road and bridge tolls

The most current transit fares and network operating conditions were input to the modeling structure used in generating transit ridership (modal shares). The transit operator for the Capital District is the Capital District Transportation Authority (CDTA). The current fare structure is summarized in the following table:

Fare Type	Current Fare
Base Fare	\$1 - U.S. coins and \$1-dollar bills are accepted
Zone Fares	None
Express Service	None
Suburban Shuttle System	\$1
Transfers	Not available
Senior/Disabled Half Fare	All the time
<i>Go-Card</i> , providing one day of unlimited use	\$3 In most cases replaces transfers
<i>Swiper</i>	\$36 (5-day) \$44 (7-day)
Half Fare <i>Swiper</i>	\$18 (5-day) \$22 (7-day)
STAR service	\$2

4. Status of TCM Implementation

The applicable SIP does not include any TCMs for the Albany-Schenectady-Troy non-attainment area. Therefore, this requirement does not apply to this conformity determination. In addition, nothing in the CDTC TIP and Plan, the A/GFTC TIP and Plan or the Capital Program of Transportation Projects in Greene, Montgomery, or Schoharie Counties will interfere with the timely implementation of TCMs in other areas.

5. Other key information

There are no non-exempt or regionally significant projects in the 12 Year Capital Program of Transportation Projects in Greene and Schoharie Counties. The Capital Program of Transportation Projects in Montgomery County has undergone no significant changes since the last conformity determination that is currently pending FHWA/FTA approval, submitted to FHWA on September 17, 2007. The currently conforming Montgomery County program includes one non-exempt project; PIN 2044.61 (Rt. 30 Amsterdam North City Line to Fulton County Line)

The preferred alternative for PIN 2044.61 consists of approximately 4.3 kilometers (2.7 miles) of Urban Principal Arterial Route 30 highway reconstruction, beginning at the north Amsterdam City line, Montgomery County and extending thru the Town of Amsterdam, Montgomery County to the intersection of Route 30 and Voorhees Road in the Town of Perth, Fulton County. The total distance in Montgomery County is approximately 2 miles and the total distance in Fulton County is approximately 0.7 miles.

This section of Rt. 30 currently varies between two and three thru lanes and includes numerous substandard right turn lane cuts and center left turn lanes and four signalized intersections. The draft preferred alternative consists of the installation of sidewalks and drainage from the Amsterdam North city line to Golf Course Road, and highway widening from Golf Course Road to Maple Ave Extension.

The build condition will result in a five lanes including a shared center left turn lane and right turn lanes at all intersections. Log City Road will be realigned 78 meters to the South to align with Maple Ave Extension. Rt. 30 north of the Log City Road/Maple Ave Extension will taper back to 3 lanes, including a shared center left turn lane. At Voorhees Road, Town of Perth, the new 3 lane section will transition back to the existing 2 lane section. Several traffic signal replacements, over 30 ROW strip takings, new highway lighting, and new sidewalks on both sides of the corridor proposed in this project. PIN 2044.61 was analyzed as described in Section 6.4 and in *Appendix E*.

Consultation

The Interagency Consultation Group (ICG) is currently reviewing the proposed classifications of all projects in the CDTC TIP and Plan and the Capital Program of Transportation Projects in Greene, Montgomery, and Schoharie Counties on. The ICG concurred with the proposed air quality classifications of all projects in the A/GFTC TIP on March 27, 2006. The draft regional emissions analysis and conformity narrative is currently undergoing interagency review. All issues identified in the interagency consultation process will be satisfactorily addressed prior to submittal of the final conformity determination to USDOT.

Transportation Demand Modeling Requirements

The CDTC STEP Model was used to evaluate the benefits of the subject projects, including emissions benefits. CDTC's Systematic Traffic Evaluation and Planning (STEP) model is used to estimate travel volumes and resulting congestion (VMT and speed). Using TMODEL2 software, the regional STEP model directly generates PM peak hour VMT and speed data attendant to existing and future land use, traffic, and highway network conditions for Albany, Rensselaer, Saratoga, and Schenectady Counties. Twenty four-hour VMT estimates were generated by factoring the PM peak hour trip set in accordance with NYSDOT's guidelines. For this exercise, the factor used to adjust the trip set was derived from hourly traffic distributions at more than 100 locations in the Capital District.

1. Classification of Projects per 40 CFR Part 93.126 and 93.127

The exempt, non-exempt, or regionally significant classifications of all transportation projects in the non-attainment area project are based on the specific highway and transit project types defined by the exemption criteria in the federal transportation conformity rules and guidance. As part of the interagency review process, the Interagency Consultation Group (ICG) concurred that the classification of projects into exempt and non-exempt categories was completed in accordance with appropriate federal regulations.

2. The horizon years must be defined

Analysis years were defined per 40 CFR Part 93.119(g)(1) as follows:

- 2002 – 8-hour ozone area base year (for informational purposes only)
- 2012 – First analysis year may be no more than five years from date of the conformity determination
- 2015 – Intermediate analysis years may be no more than ten years apart

- 2025 – AGFTC Plan horizon year per 40 CFR Part 93.119(g)(1)
- 2030 – New Visions Plan horizon year per 40 CFR Part 93.119(g)(1)

3. “No-build” scenario

In order to evaluate the impact of the TIP on emissions, the impacts of a “no-build” scenario were evaluated. The no-build scenario is a hypothetical scenario that would result if the TIP and the 2030 New Visions Plan and all non-exempt projects were not implemented. The networks used for the 2012, 2015, 2025 and 2030 “no-build” scenarios assume projects in the TIP and the Plan as well as all non-exempt projects would not be implemented. Travel demand for the year 2012, 2015, 2025 and 2030 “no-build” scenarios was simulated using Capital District Regional Planning Commission (CDRPC) official forecasts of households and employment, and CDTC forecasts of vehicle ownership.

4. “Action” or “build” scenario

All projects in the 2007-2012 CDTC TIP and 2030 New Visions Plan, the 2007-2012 A/GFTC TIP and 2025 Long Range Plan, and applicable Capital Programs that could be accommodated in the modeling process were included in the conformity analysis “build” scenario networks. Therefore, this analysis includes not only the effect of the non-exempt and regionally significant projects but also a number of exempt projects that produce system performance benefits and can be modeled. For a detailed description of the coding of non-exempt and other projects in CDTC’s travel demand modeling process, please refer to Appendix A.

The year 2012 TIP/Financially Constrained Plan network includes projects from the 2007-2012 TIP; the 2015, 2025 and 2030 TIP/Financially Constrained Plan networks include all TIP projects, including those scheduled in the post 5 year period of the TIP. For build conditions for 2012, 2015, 2025 and 2030, travel demand forecasts were prepared that were consistent with achievements expected from implementation of the *New Visions* plan. With full implementation of the *New Visions* plan, increases in daily vehicle travel will be dampened from the trend forecast of 30% (1996-2015) to approximately one-third to one-half that level. This will occur through a combination of substitution of communication for travel, increased carpooling, increased bus, bike, and/or walk travel, and shorter trip lengths (due to proximity of activities). This dampening of daily vehicle travel was represented in the CDTC STEP model as a 10% reduction in vehicle trips in 2012 with respect to trend growth forecasts, and as a 15% reduction in vehicle trips in 2015, 2025 and 2030. The full *New Visions* Plan network for 2015, 2025 and 2030 includes TIP projects plus additional economic development and congestion management projects; hypothetical, representative projects were selected which do not have status in the New Visions Plan. The New Visions Plan intentionally does not designate the additional \$60 million for Congestion Management projects and the additional \$60 million economic development projects to any specific projects at this time.

The financially constrained plan is based on "steady-state funding". Steady state funding is the currently expected state, federal and local funds would continue at current levels (adjusted for inflation) through the 21-year period, and all federal demo project funds would be received. This scenario makes comparable progress across all plan improvement initiatives. The financially constrained plan is assumed to achieve comparable progress -- 71 percent -- in the reduction in travel that would be achieved by full plan implementation.

The TIP network used in the analysis assumes that all TIP projects are implemented. All non-exempt projects were modeled, as well as a number of exempt projects that will affect intersection capacities. Projects programmed in the post five year network were not included in the year 2012 TIP network, but were included in the 2015, 2025 and 2030 build networks. The year 2012 TIP/Financially Constrained Plan network includes projects from the 2007-2012 TIP; the year 2015 and 2025 TIP/Financially Constrained Plan network includes all TIP projects, including those scheduled in the post 5 year period of the TIP. For build conditions for years 2012, 2015, 2025 and 2030, travel demand forecasts were prepared that were consistent with achievements expected from implementation of the *New Visions* plan. CDTC's model network includes projects in the Town of Moreau within the A/GFTC planning boundary. There are no non-exempt projects scheduled for construction in Moreau during the time period of the *New Visions* Plan. For additional detail regarding the coding of non-exempt and other projects in the CDTC STEP model, refer to *Appendix A*.

In order to evaluate the impact of the CDTC TIP on emissions, the impacts of a "no-build" scenario were evaluated. The no-build scenario is a hypothetical scenario that would result if the TIP were not implemented. The networks used for the 2012, 2015, 2025 and 2030 "no-build" scenarios assume projects in the TIP would not be implemented. Travel demand for the year 2012, 2015, 2025 and 2030 "no-build" scenarios was simulated using Capital District Regional Planning Commission (CDRPC) official forecasts of households and employment, and CDTC forecasts of vehicle ownership.

Similarly, in order to evaluate the impact of the non-exempt project in the Montgomery County, the impacts of a "no-build" scenario and "build" scenario were evaluated. The traffic data used for the 2012, 2015, 2025 and 2030 "build" scenarios assumes the Rt. 30 capacity and signal improvements will be implemented while the no-build scenario assumes the same daily traffic volumes with improved level of service conditions during congested periods. Travel demand for the year 2012, 2015, 2025 and 2030 scenarios was based on traffic growth projections established by NYSDOT Region 2. There are no non-exempt or regionally significant projects scheduled for future construction in Greene or Schoharie Counties. Therefore, projects in these two counties have no effect on the future year "action" scenarios in the regional emissions analysis.

5. Identification of projects analyzed with an "off-model" process

As stated through this determination, there is one non-exempt project, PIN 2044.61 (Rt. 30: Amsterdam City Line to Fulton County Line) programmed for future construction in Montgomery County. This project was analyzed using updated build and no-build scenario traffic volumes, growth factors provided by NYSDOT Region 2 and speed values generated by the urban traffic micro simulation model, SimTraffic. The NYSDOT MOBILE 6.2 emission factor tables dated April 2007 were applied to the traffic data to estimate the effect of the emissions burden of the project in each conformity analysis year. The detailed results of this analysis including a description of the SimTraffic modeling process and formulas are included in *Appendix E*.

The emission impacts of ITS projects in the CDTC TIP were also modeled using a process which was exogenous to the CDTC STEP Model assignments, since these emission impacts are based on improvements to non-recurring, incident related delay. The results of this analysis were then added to the regional total emission results. A detailed discussion of this analysis is provided in *Appendix B*. The affected projects are:

- PIN 1806.60 Transportation Management Center
- PIN 1806.61 Highway Emergency Local Patrol (HELP) Program
- PIN 1807.03 ITS Elements & Transmit Systems for Capital District Interstates

Consistency of TIP and Plan

None of the projects in the 2007-2012 CDTC TIP or 2007-2019 Statewide Transportation Improvement Program are anticipated to interfere with the implementation of any project in the New Visions Plan, and vice versa. All applicable projects were consolidated into one regional emissions analysis that captures the effects of implementing all transportation system improvements in each applicable future analysis year (i.e. 2012, 2015, 2025 and 2030).

Regionally Significant Non-Federal Projects

There are no regionally significant non-federal transportation projects scheduled for construction in the Capital District non-attainment area.

Latest Emissions Model

MOBILE 6.2 emission factor tables developed by NYSDOT in April 2007 were used for this analysis. For future analysis years, the MOBILE 6.2 input files are based on 2006 vehicle registration and diesel fraction data, the Upstate vehicle I/M program, reformulated gasoline. The input files for temperature, humidity, mileage accumulation, start distribution, VMT by hour, and vehicle certification programs used to develop these tables are consistent with those used by NYSDEC in developing the on-road motor vehicle emissions inventory for counties in Upstate New York. For further detail on the MOBILE6 inputs used, refer to Appendix G.

CDTC has developed a post processor program that calculates total emissions for any given traffic assignment. Emission rates for VOC, NO_x and carbon monoxide from the NYSDOT emission factor tables are coded into look-up tables used by the STEP Model. For any given traffic assignment, emissions are calculated for each link on the network based on assigned traffic VMT, functional class, total link operating speed, year of analysis and the corresponding emission rate. The total emissions for all links are then aggregated for a regional total. NYSDOT's 2006 Traffic Count Processing Seasonal Adjustment Factors were used to increase VMT in all scenarios to reflect summer traffic volumes, since the highest levels of ozone are usually detected in the summer months.

Regional emissions analysis

In each analysis year, VOC and NO_x emissions in the build/action scenario are less than or equal to corresponding emissions in the no-build scenario. Therefore, the regional emissions analysis demonstrates that the CDTC 2007-2012 TIP and 2030 *New Visions* Plan, 2007-2012 A/GFTC TIP and 2025 Long Range Plan, and 2007-2019 Capital Programs of Transportation Projects in Greene,

Montgomery, and Schoharie Counties conform to the New York State Implementation Plan for the 1-hour and 8-hour ozone standard. A table summarizing the regional emissions follows:

Air Quality Impact of the CDTC 2007-2012 TIP, Fiscally Constrained CDTC <i>New Visions</i> Plan, A/GFTC 2007-2012 TIP, A/GFTC 2025 Long Range Plan and the Capital Program of Transportation Projects in Montgomery, Greene, and Schoharie Counties					
Scenario	Volatile Organic Compounds (VOCs) Emissions		Nitrogen Oxides (NO_x) Emissions		Daily Vehicle Miles Traveled (Thousands)
	kg/day	tons/day	kg/day	tons/day	
Year 2002*	37,956	41.84	48,400	53.35	23,070
Year 2012 No-build	14,276	15.74	19,566	21.57	25,802
Year 2012 with 2007-2012 TIP and Financially Constrained New Visions Plan	12,794	14.10	18,188	20.05	23,653
Year 2015 No-build	11,968	13.19	14,346	15.81	26,600
Year 2015 with 2007-2012 TIP and Financially Constrained New Visions Plan	10,432	11.50	13,104	14.44	23,910
Year 2025 No-build	7,765	8.56	7,126	7.86	28,675
Year 2025 with 2007-2012 TIP and Financially Constrained New Visions Plan	6,648	7.33	6,488	7.15	25,733
Year 2030 No-build	8,675	9.56	5,832	6.43	29,757
Year 2030 with 2007-2012 TIP and Financially Constrained New Visions Plan	7,067	7.79	5,181	5.71	26,555

The regional emissions analysis is presented in further detail in *Appendices B - E*.

Public Involvement

The Albany-Schenectady-Troy conformity determination is currently undergoing a public review process administered by CDTC, A/GFTC, and NYSDOT in October of 2007. Any comments on the conformity determination raised during the public review period will be addressed in the final conformity determination. Evidence of public notice will be included in the final conformity determination Appendix H.

Evidence of MPO Resolution

The applicable signed CDTC and A/GFTC Policy Board resolutions will be included in Appendix I of the final conformity determination.

Statement of Conformity with the SIP

The attached documentation and information summarized herein demonstrate that all transportation plans and programs in the Albany-Schenectady-Troy 8-hour Ozone Non-Attainment Area are in conformity with the SIP, in accordance with the transportation conformity rules published by EPA and NYSDEC.