

**Air Quality Conformity Analysis
for
Muskegon County, Michigan Nonattainment Area**

Final

April 16, 2020

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1.0 Conformity

1.1 Introduction

Transportation conformity provisions of the Clean Air Act Amendments require metropolitan planning organizations (MPOs) to make a determination that the Long-Range Transportation Plan (LRTP), Transportation Improvement Program (TIP), and projects conform to the State Implementation Plan (SIP), and that regional emissions will not negatively impact the region's ability to meet the National Ambient Air Quality Standards (NAAQS).

Conformity to the SIP means that the region's LRTP and TIP 1) will not cause any new violations of the NAAQS; 2) will not increase the frequency or severity of existing violation; and 3) will not delay attaining the NAAQS. A demonstration is conducted by comparing emissions estimates generated from implementation of LRTPs and TIPs for analysis years to the motor vehicle emissions budgets (MVEBs) contained in the maintenance SIP.

The purpose of this report is to document the process and findings of the transportation conformity analysis for the nonattainment and maintenance areas.

1.2 Nonattainment and Maintenance Areas

Muskegon County is partially an ozone nonattainment area and entirely an ozone maintenance area. Within the boundaries is part of the West Michigan Metropolitan Transportation Planning Program (WestPlan) MPO.

Findings of the transportation conformity analysis are for projects within Muskegon County. Projects in the WestPlan FY 2020-2023 TIP are included in the modeling but not in the project list, except one project that changed from exempt to non-exempt since the TIP was reviewed. Projects evaluated for this analysis are contained in:

- WestPlan 2045 LRTP and
- A new non-exempt TIP project.

1.3 Conformity Finding

The staff of WestPlan finds that the LRTP and TIP conform to the SIP for the 2015 ozone standard and 1997 ozone standard based on the results of this conformity analysis. This report makes the determination that the region's transportation plan and programs satisfy all applicable criteria and procedures in the conformity regulations.

This conformity analysis document was subject to a public comment period of March 19 to April 1, 2020. Comments received were recognized, considered, and a response provided.

The MPO policy committee made a formal conformity determination, through a resolution, at the WestPlan Policy Committee on April 15, 2020.

1.4 Results of Conformity Analysis

Conformity is demonstrated when the analysis-year emissions are equal to or less than the SIP budget. For the 2015 and 1997 ozone standards, as shown in Table 1, the emissions results for the analysis years show that the volatile organic compounds (VOC) and nitrogen oxides (NOx) emissions are lower than the SIP budgets; thus, conformity for the ozone standards are demonstrated.

Table 1: Results of 2015 and 1997 Ozone Standard Conformity Analysis

Analysis Year	Emissions (tons/day)	
	VOC	NOx
SIP Budget	6.67	11.0
2020	2.76	2.87
2025	2.18	1.77
2035	1.31	0.80
2045	1.11	0.61

2.0 Background and Attainment Status

2.1 Background

The federal Clean Air Act Amendments of 1990 (CAAA) established rules to improve the air, protect public health, and protect the environment. The act requires the U.S. Environmental Protection Agency (EPA) to set, review, and revise the National Ambient Air Quality Standards (NAAQS) periodically.

The Clean Air Act links together air quality planning and transportation planning through the transportation conformity process. Air quality planning is controlled by Michigan’s SIP, which includes the state’s plans for attaining or maintaining the NAAQS. The main transportation planning tools are the metropolitan LRTP and the metropolitan TIP. Transportation conformity ensures that federal funding and approval are given to highway and transit activities that are consistent with the SIP and that these activities will not affect Michigan’s ability to achieve the NAAQS.

Transportation activities that are subject to conformity are LRTPs, TIPs, and all non-exempt federal projects that receive Federal Highway Administration (FHWA) or Federal Transit Administration (FTA) funding or approval. The conformity process ensures emissions from LRTP, TIP, or projects are within acceptable levels specified within the SIP and meet the goals of the SIP.

Transportation conformity only applies to on-road sources and transportation-related pollutants: ozone, particulate matter (particulate sizes 2.5 and 10), nitrogen dioxide, and carbon monoxide.

In addition to emissions that are directly emitted, regulations specifically require certain precursor pollutants to be addressed. Precursor pollutants are those pollutants that contribute to the formation of other pollutants. For example, ozone is not directly emitted but created when NO_x and VOC react with sunlight.

When the EPA revises an NAAQS, all areas of the country are evaluated to determine if monitored levels of the pollutant are at or below the standard; these areas are classified as attainment. If the pollutant level is above the standard, these areas are classified as nonattainment. MPOs in areas classified as nonattainment or maintenance must conduct conformity analysis on their transportation programs.

2.2 Attainment Status

On April 15, 2004, the EPA issued final designations of areas not attaining the 1997 ozone NAAQS (also referred to as 1997 ozone standard). Muskegon County was designated a nonattainment area.

On May 16, 2007, the EPA redesignated the area attainment/maintenance, approving and finding adequate motor vehicle emissions budgets for VOC and NO_x for the year 2018. The area was placed into maintenance, requiring conformity emission to be compared to the MVEBs contained in the SIP, referred to as SIP budgets.

On July 20, 2012, the EPA designated all of Michigan as attainment for the strengthened 2008 ozone NAAQS.

On July 20, 2013, the EPA partially revoked the 1997 ozone standard, withdrawing the requirement to do transportation conformity for areas that were in maintenance. On April 6, 2015, the EPA completely revoked the 1997 ozone standard, which resulted in removal of all transportation conformity requirements.

On April 23, 2018, the FHWA started requiring areas in the country to conduct conformity if they were a maintenance area for the 1997 ozone standard and attainment for the 2008 ozone standard when the 1997 ozone NAAQS was revoked. This was to comply with the court's decision in *South Coast Air Quality Management District v. EPA*. Later, this was amended to require MPOs to have a conformity in place on Feb. 16, 2019, and conduct conformity going forward.

On Aug. 3, 2018, the EPA designated part of Muskegon County as nonattainment for the strengthened 2015 ozone NAAQS (also referred to as 2015 ozone standard).

2.3 SIP Budgets

Muskegon County has existing maintenance budgets from the 1997 ozone attainment/maintenance SIP. Regulations require use of these budgets to test both ozone standards. Emissions generated must be equal to or less than the SIP budgets, also referred to as MVEB. The MVEB is the portion of the total allowable emissions allocated to highway and transit vehicle use in the maintenance or nonattainment area. By showing emissions are below the MVEB, the LRTP and TIPs are conforming to the SIP. Conformity is conducted for the whole county until a budget is determined for the 2015 ozone nonattainment area.

3.0 Interagency Consultation

Consultation with federal, state, and local transportation authorities is conducted through the Michigan Transportation Conformity Interagency Workgroup (MITC-IAWG). Issues discussed include evaluating and choosing emission models and methods, determining regionally significant project definition and projects, procedures for future MITC-IAWG meetings, and rules for reviewing projects.

A MITC-IAWG was held on Oct. 10, 2019, to review projects in Muskegon County; individuals attended in person or by conference call. At the meeting, the Allegan nonattainment area was also discussed since both MPO regions extend into Ottawa County, which is part of the Grand Rapids 1997 ozone maintenance area. A MITC-IAWG was also held on Dec. 16, 2019, to review one TIP project. Summaries of the MITC-IAWG meetings and relevant interagency consultation correspondence related to this conformity is in Appendix A. A copy of this conformity analysis was sent to each MITC-IAWG member for review and comment.

4.0 Public Participation

The Public Participation Plan, adopted by the MPO policy committee, establishes the procedures by which the MPOs reach affected public agencies and the public. The same procedures were followed for this document, ensuring the public has an opportunity to review and comment before the MPO policy committee makes a determination.

A formal public comment period for the draft Air Quality Conformity Analysis was held from March 19 to April 1, 2020. Public comments received and responses to the comments are in Appendix B.

5.0 Projects Evaluated for the Conformity Analysis

All projects in the WestPlan 2045 LRTP were evaluated for inclusion in the analysis. Projects classified as non-exempt must be analyzed. Projects with exempt classification that can be modeled with the travel demand model were modeled. Appendix C includes a complete list of the projects evaluated for inclusion in this analysis. Projects in the WestPlan FY 2020-2023 TIP are included in the modeling but not in the project list, except one project that changed from exempt to non-exempt since the TIP was reviewed.

6.0 Transportation Modeling

6.1 Travel Demand Forecasting Models

Nonattainment areas are established independent of MPO boundaries. The Muskegon County nonattainment and maintenance area is covered by the WestPlan travel demand forecasting model. The model was developed in TransCAD modeling software, using the latest demographic and employment data available to generate estimates of travel, vehicle miles of travel (VMT), vehicles hours of travel (VHT), and speeds. Detailed documentation is contained in a separate document available upon request.

6.1.2 WestPlan Model

The WestPlan model covers all of Muskegon County and the northwest portion of Ottawa County. Only the Muskegon County portion of the model is considered for this analysis. Developed by MDOT, this standard four-step model has a base year of 2015 and a horizon year of 2045. Each of the four steps - trip generation, trip distribution, mode choice, and traffic assignment - are checked for reasonableness against national standards. Final model validation verifies that the assigned volumes replicate actual traffic counts. The decennial 2010 census and 2015 ACS data were the sources of population and household base data. Employment data is developed from a private business database verified with local knowledge. Future data is based on the Regional Economic Models, Inc. (REMI) economic and demographic forecasts. The University of Michigan and MDOT jointly develop county-specific forecast data for the REMI model.

6.1.3 Coding Travel Demand Model Links for NFC by Urban and Rural

For emission modeling, the National Functional Classification (NFC) system is used to determine the function of roads; however, after 2010 NFCs do not distinguish roads by urban and rural. The emission model, Motor Vehicle Emission Simulator (MOVES), requires roads to be classified as urban or rural. MOVES require roads to be grouped into one of four road types: rural restricted, rural unrestricted, urban restricted, and urban unrestricted. To determine a road's urban or rural status, roads within the adjusted census urban boundary were considered urban and those outside as rural. NFCs designated as interstate and other freeways are considered restricted while all others are considered unrestricted. The Michigan Geographic Framework (GIS digital base map) was used to combine NFC with adjusted census urban boundary to generate MOVES road types for the network.

6.1.4 Highway Performance Monitoring System (HPMS)

The EPA and FHWA endorse HPMS as the source of VMT estimates. The travel demand modeling VMT is aggregated by NFC road types for the county, then normalized to HPMS data for the base year/validation year of the travel demand model. Normalization factors were applied to all analysis years.

6.2 Analysis Years

Analysis years were determined by the MITC-IAWG. Projects requiring modeling are grouped into an analysis year based on the projects open-to-traffic date. Emissions are generated for each analysis year.

Analysis Year	Reason
2020	2015 ozone standard attainment year
2025	Interim year (so analysis years not more than 10 years apart)
2035	Interim year (so analysis years not more than 10 years apart)
2045	Last year of the WestPlan long-range transportation plan

7.0 Latest Planning Assumptions

7.1 Demographic Data

The most current and future assumptions developed or approved by the MPO were used in the development of the travel demand models. Table 2 shows base and future year population and employment by county from the travel demand models.

Table 2: Base and Future Year Population and Employment by County

County	Population		Employment	
	2015	2045	2015	2045
Muskegon County	223,939	232,248	113,993	119,418

7.2 Vehicle Miles of Travel

Vehicle miles of travel (VMT) is one measure of travel. Current and future levels of travel and growth rates are provided in Table 3.

Table 3: Vehicle Miles of Travel and Growth Rate by County

	Analysis year				
	Base Year 2015	2020	2025	2035	2045
Muskegon County					
VMT	4,108,569	4,208,184	4,290,740	4,370,003	4,403,462
Growth Rate	1.00	1.02	1.04	1.06	1.07

7.3 Vehicle Hours Traveled

Vehicle hours traveled (VHT) is an indicator of congestion. Current and future levels are provided in Table 4.

Table 4: Vehicle Hours of Travel by County

	Analysis year				
Muskegon County	Base Year 2015	2020	2025	2035	2045
VHT	115,117	117,974	120,386	122,734	123,607

7.4 Transportation Control Measures

There are no transportation control measures (TCMs) identified in the applicable state implementation plan. Thus, no measures are included at this time.

8.0 Emission Modeling

8.1 MOVES Specifications

The EPA’s MOVES version MOVES2014b was used to generate emissions. Ozone is formed in the presence of heat and sunlight, so the highest ozone concentrations are monitored during the summer. This conformity analysis involves generating a summer (July) weekday emissions to simulate the meteorology of a high-ozone summer day.

8.2 Road Type Distribution

HPMS data is used to create MOVES road-type distribution fractions. County-level HPMS passenger data is used for motorcycle and passenger vehicles, and commercial HPMS is used for trucks and buses. HPMS VMT is aggregated to MOVES road types, then converted to a fraction, generating a road-type distribution.

8.3 Average Speed

Speed distributions are created using a method developed by EPA for taking a single average speed and creating a distribution. The method generates an average speed fraction by MOVES road type, by day, by hour, and speed bin from speeds generated by the travel demand forecasting models. The same distribution is used for each vehicle type.

8.4 Ramp Fraction

The default VHT ramp fraction of 8 percent was used.

8.5 Average Weekday VMT to Annual VMT

Monthly VMT adjustment factors were obtained from MDOT's data collection area. The EPA's AADVMT Converter-Tool MOVES 2014 was used to convert annual average daily VMT to annual VMT, monthly VMT fractions, and daily VMT fractions. Hourly fractions use MOVES default data. For motorcycles, the monthly fractions use MOVES defaults since local data is limited. Future analysis years utilize the same fractions.

8.6 Vehicle Population

The source of the vehicle population is the Michigan Secretary of State (SOS) vehicle registration database of 2015. The database was supplemented with school bus data from the Michigan Department of Education and MDOT public transit bus data. The EPA's default distributions were used to determine intercity bus, refuse truck, single-unit truck, and combination truck categories. The SOS data must be converted to MOVES source (vehicle) types. Table 5 shows how vehicle body style combined with plate type and company code are used to obtain MOVES vehicle types.

Future year vehicle population is based on growth in VMT from base year to analysis year. The growth rate is applied to all MOVES vehicle types. Table 3 shows the VMT for each analysis year and growth rate.

8.7 Vehicle Age Distribution

MOVES requires vehicle age as one of the local data inputs. The Michigan SOS vehicle registration database of 2015 was the source of vehicle ages. Vehicles are assigned to an age group, from 0 to 30-plus, based on model year indicated in the SOS database, with 0 being the newest vehicles (2015 or newer) and each year is its own group until vehicles are 30 years and older, which are aggregated into the 30-plus group. The SOS database is sorted by MOVES vehicle types and age. For intercity buses, refuse trucks, single-unit trucks, and combination trucks, the EPA's default age distribution are used to calculate splits in population because of limited local numbers. Base year age distribution fractions were used for all future analysis years.

8.8 Other Local Data

The MOVES model allows input for other types of local data, if available. This conformity demonstration used default meteorology data since the budgets were developed using default data; thus, analysis should also. Lacking local data, defaults were used for hoteling (truck parking) and starts. The default fuel data is correct for Michigan.

9.0 Conclusion

Conformity has a two-step endorsement process. The MPOs must make a formal conformity determination through a resolution that the findings of this conformity analysis conform to the SIP; thus, emissions are at or below the budgets found in the SIP. Then FHWA, jointly with the FTA, after consultation with the EPA, issues a letter of concurrence with the determination.

The conformity analysis described here and conducted by MDOT, with support of the WestPlan, concludes that the WestPlan 2045 LRTP and 2020-2023 TIP contained in the Muskegon County conformity area meets all applicable requirements for conformity for the 2015 and 1997 ozone standards; thus, it is recommended FHWA support this conformity determination finding.

Table 5: MOVES Source Types from SOS Body Style, Plate Type, and Company Code

MOVES Source Type	SOS Body Style, Plate Type, and Company Code
11 – Motorcycles	Motorcycles
21 – Passenger Cars	Two-Door Four-Door Convertible Roadster Low-Speed
31 – Passenger Trucks	Station Wagon Pickup Van Hearse with Plate Type, Personal Ambulance with Plate Type, Personal Panel Van with Plate Type, Personal
32 – Light Commercial Trucks	Pickup Commercial or Company Van Commercial or Company Hearse Commercial or Company Ambulance Commercial or Company Panel Van Commercial or Company Utility Truck Wrecker
40 – Buses (MOVES: 41*, 42, 43)	Bus; Supplemented with Other Data Sources
50 – Single-Unit Trucks* (MOVES: 51, 52, 53)	Dump Truck Mixer Truck Stake Truck
54 – Motorhomes	Motorhome
60 – Combination Trucks* (MOVES: 61, 62)	Tractor Trailer Tanker

* The EPA default age distribution is applied to calculate individual MOVES Source Type categories.

Appendix A: Meeting Summary of the Interagency Workgroups

Summary of Meeting

Michigan Transportation Conformity Interagency Workgroup (MITC-IAWG)

Allegan County Nonattainment Area

Muskegon County Nonattainment Area

For New 2045 Long Range Transportation Plans

2:30-3:30 p.m., Thursday, Oct. 10, 2019

Dory Conference Room, Third floor, Van Wagoner Transportation Building, Lansing, MI

<u>Name</u>	<u>Agency</u>
In attendance:	
Andrea Dewey	Federal Highway Administration (FHWA)
Breanna Bukowski	Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Michael Leslie	Environmental Protection Agency (EPA)
Donna Wittl	Michigan Department of Transportation (MDOT)
Amy Haack	Muskegon MPO (WestPlan)
Brian Mulnix	WestPlan
Joel Fitzpatrick	WestPlan
Carolyn Ulstad	Holland MPO (MACC)
Dennis Kent	MDOT
Tyler Kent	MDOT
Jon Roberts	MDOT
Ryan Gladding	MDOT

Attendance at the meeting was in person or teleconferencing with web linking.

Michigan Transportation Conformity Interagency Workgroup (MITC-IAWG) for two areas.

- 1) Muskegon County, 1997 ozone orphan maintenance and 2015 ozone nonattainment area
- 2) Allegan County, 1997 ozone orphan maintenance and 2015 ozone nonattainment area

Agenda:

- 1) Modeling assumptions
- 2) Review projects
- 3) Policies for reviewing projects: existing and new
- 4) Coordination between MACC and rural STIP for Allegan County
- 5) Status of limited orphan maintenance and orphan maintenance areas

With the overlapping MPO boundaries within the Grand Rapids limited orphan maintenance area, a joint MITC-IAWG is usually held for three areas. But since the Grand Rapids MPO did not have their 2045 LRTP project list completed, the other two areas held a joint meeting. The same meeting

summary is duplicated for each of the two areas, with only projects in that nonattainment area attached.

Modeling Assumptions

The group discussed and agreed on all the modeling assumptions that will be used for the conformity analyses, listed below.

Analysis Years:

Base Year	Reason
2015	Base year for analysis: validation year of travel demand models WestPlan, MACC, and Statewide model
Analysis Year	Reason
2020	2015 ozone standard attainment year
<u>2021</u>	1997 ozone standard maintenance budget year (<u>only Allegan County</u>)
2025	Interim year (so analysis years not more than 10 years apart)
2035	Interim year (so analysis years not more than 10 years apart)
2045	Last year of MACC and WestPlan long range transportation plans

MOVES Model: use MOVES2014b

Base template for MOVES Inputs:

- 2015 Highway Performance Monitoring System (HPMS)
- 2015 MI Secretary of State vehicle registration data and vehicle population and age distribution

Review of Projects:

- MACC: Allegan and Ottawa county projects for the LRTP
- WestPlan: Muskegon and Ottawa county projects for the LRTP

The group discussed the projects and agreed on analysis groupings and non-exempt status for all projects for the MACC. The Beach Road project in Ottawa County was removed from the list.

The group discussed the potential road changes around the casino in rural Allegan County. From the description, the group indicated the project would most likely be exempt.

The projects for the WestPlan were discussed. The Henry Street project was moved from analysis year 2040 to 2045. The group discussed the projects and agreed analysis years for the projects and exempt or non-exempt status.

Policies for Reviewing Projects: Existing and New

The existing policies were reviewed. The traffic circle policy was altered to include roundabouts, too. The auxiliary lane policy was changed from "if less than 1 mile" to "if 1 mile or less." This makes the policy consistent with the other policies. The policy on adding a center turn lane was changed from not

triggering a new conformity to if 1 mile or less will be exempt because the project will correct, improve or eliminate a hazardous feature. Several new policies were agreed to and a few policies that the group had agreed to in the past were stated for clarification. The new list of policies is included at the end of the summary.

The template statement for an amendment with projects that only have cost changes is also included at the end of this summary.

The question was asked if US-231 was included in the base travel demand models. It is in both travel demand models' base year. The travel demand modelers were asked how they keep track of modeled projects. The answer is that most keep a list of projects. The group discussed how indirect left turns are handled in the travel demand models. These types of changes should be brought to the IAWG to be discussed on an individual basis.

Coordination between MACC and Rural STIP for Allegan County

The coordination between the MACC and rural STIP amendment cycle was discussed. The MACC will contact Mark Kloha, MDOT, to get the projects from the rural STIP and thus provide all projects in Allegan County to the IAWG. The MACC has TIP amendments scheduled every month where the rural STIP only has amendments every other month.

Status of limited orphan maintenance and orphan maintenance areas

The Grand Rapids area (Ottawa and Kent counties) will soon be a limited orphan maintenance area (LOMA) for the 1997 ozone standard. With this new status, the MITC-IAWG for this area will only meet for new LRTPs and new TIPs. For amendments in Ottawa and Kent counties, the statement indicating these projects are in a LOMA should be attached to the amendment.

For Allegan and Muskegon county nonattainment areas, if the amendment is only for exempt projects, the MPOs will e-mail their individual projects to the MITC-IAWGs. A conference call will be needed to review non-exempt projects. In this case, both Muskegon County and Allegan County groups will be included; this will facilitate consistency.

Other

Andrea Dewey informed the group this was her last meeting; she is taking another position within FHWA on Oct. 13, 2019. Aaron Dawson will be taking responsibility for the MACC, WestPlan, and GVMC MPOs.

Summary of Meeting

Michigan Transportation Conformity Interagency Workgroup (MITC-IAWG)
Allegan County Nonattainment Area
Muskegon County Nonattainment Area
For New 2045 Long Range Transportation Plans

10-11 a.m. (EST), Monday, Dec. 16, 2019

<u>Name</u>	<u>Agency</u>
In attendance:	
Aaron Dawson	Federal Highway Administration (FHWA)
Breanna Bukowski	Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Michael Leslie	Environmental Protection Agency (EPA)
Donna Wittl	Michigan Department of Transportation (MDOT)
Amy Haack	Muskegon MPO (WestPlan)
Brian Mulnix	WestPlan
Joel Fitzpatrick	WestPlan
Laurel Joseph	Grand Rapids MPO (GVMC)
Andrea Faber	GVMC
George Yang	GVMC
Dennis Kent	MDOT
Tyler Kent	MDOT
Bill Loehle	MDOT
Jon Roberts	MDOT
Ryan Gladding	MDOT
Jeff Franklin	MDOT
Luke Walters	MDOT

Attendance at the meeting was teleconferencing only.

One project was reviewed by the group, job number 205376. This is a local project in Muskegon County that was reviewed by the group previously as a reconstruction only; however, it will be a four-lane conversion to two lanes. The new configuration was determined to be non-exempt and will be modeled in the 2025 analysis year.

**MITC-IAWG Policies for Reviewing Projects for
Allegan County Nonattainment Area and
Muskegon County Nonattainment Area**

Policies were reviewed and agreed to by the Michigan Transportation Conformity Interagency Workgroups (MITC-IAWG) for Allegan County nonattainment and maintenance area and Muskegon County nonattainment and maintenance area at the Oct. 10, 2019, meeting.

The Transportation Conformity State Implementation Plan memorandum of agreement defines roles, responsibilities, and regulations for interagency workgroups in Michigan.

Policies:

1. Definition of an air quality regionally significant project:
A transportation project on a facility that serves regional transportation needs (access to and from the areas) from outside the region, access to major activity centers (and new centers of activity malls, sporting, and transportation terminals), and would normally be included in the travel demand model. At a minimum, includes principal arterials (national functional classification 1, 2, and 3) and fixed guideway transit that offer an alternative to regional highway travel.
2. Traffic circles and roundabouts: exempt; intersection channelization project.
3. Auxiliary lanes if 1 mile or less: exempt; projects that correct, improve, or eliminate a hazardous location or feature. EPA/FHWA policy November 2017.
4. Ramp metering: exempt; projects that correct, improve, or eliminate a hazardous location or feature. EPA/FHWA policy November 2017.
5. Addition of right-turn lane or left-turn lane at an intersection, individual lane length less than half a mile: exempt; projects that correct, improve, or eliminate a hazardous feature; or not able to be modeled with the travel demand model.
6. Adding a center turn lane of 1 mile or less: exempt; projects that correct, improve, or eliminate a hazardous feature.
7. Road diets:
 - a. Four to three lanes: four through-lanes to two through-lanes with dual center left-turn lane if length is 1 mile or less: exempt; projects that correct, improve, or eliminate a hazardous location or feature.

- b. Other types of road diets must be discussed by the group to consider specific details to determine exempt or non-exempt status.
8. For amendments to only change the cost of a project or projects, the previous air quality status (exempt or non-exempt) will remain for each project. The MITC-IAWG will not need to review the project again. The MPO for TIP projects and MDOT for rural STIP projects will be responsible for ensuring that only the cost changed. A statement attached to the amendment when submitted will state only costs have changed. The statement will also list when the last time each project was reviewed by MITC-IAWG.
9. Moving a non-exempt project within an analysis year group can be done as part of an e-mail IAWG. The situation should be explained in the air quality comment field.
10. If a non-exempt project is part of an amendment, a conference call MITC-IAWG is required.
11. If all projects in the amendment are exempt, an MITC-IAWG can be conducted by e-mail.
12. Process to conduct a MITC-IAWG through e-mail:
 - a. The MPO will e-mail the IAWG requesting concurrence that all projects are exempt.
 - b. The IAWG members will have five business days, starting the day after the e-mail project list is sent to review. IAWG members are requested to respond whether they “concur” or “do not concur.” Only one response from each key agency of the IAWG is required.
 - c. The date of the IAWG will be the date the e-mail request is sent.
 - d. A basic e-mail format has been established.
13. All projects that can be modeled in the travel demand model will be modeled regardless of exempt status when a new conformity analysis is conducted.
14. Projects are grouped into analysis years based on the year the project will be open to traffic.

Template to be used with amendments with only cost changes.

**Transportation Improvement Program
Amendment for Projects with Only Cost Change**

(Insert MPO name or MDOT here)

Air Quality Conformity

2015 Ozone NAAQS Nonattainment and Maintenance Area for **(insert county here)**

Transportation conformity provisions of the Clean Air Act Amendments (CAAA) requires metropolitan planning organizations (MPOs) in nonattainment and maintenance areas to make a determination that the Long-Range Transportation Plan (LRTP) and Transportation Improvement Program (TIP), conform to the State Implementation Plan (SIP), and that regional emissions will not negatively impact the region's ability to meet the National Ambient Air Quality Standards (NAAQS).

Conformity to the SIP means that the region's LRTPs and TIPs 1) will not cause any new violations of the NAAQS; 2) will not increase the frequency or severity of existing violation; and 3) will not delay attaining the NAAQS.

This amendment contains projects that are for cost change only. **(select one: The MPO or MDOT)** has reviewed the projects and determined that only cost changes are being made. These project/s were reviewed by the Michigan Transportation Conformity Interagency Workgroup (MITC-IAWG) previously, and the current amendment will not change the existing conformity analysis. MITC-IAWG review is not required for this amendment.

Job Number

Last Date MITC-IAWG Reviewed

Appendix B: Public Comments and Responses

No comments were received.

Appendix C: Projects Evaluated for Conformity Analysis

The list of projects begins on the following page.

2045 WestPlan Long-Range Transportation Projects in Muskegon County

Review at Dec. 16, 2019 MITC-IAWG

Fiscal Year	Job Type	Job#	MPO	County	Responsible Agency	Project Name	Limits	Length	Primary Work Type	Phase	Total Estimated Amount	Air Quality	Air Quality Comments
2022	Local	205376	WESTPLAN	Muskegon	Muskegon	Terrace St	Terrace Street - Shoreline Drive to Apple Ave	0.521	Convert 4 lane boulevard into 2 lane road (one lane in each direction) and reconstruct	CON	\$1,010,000	non-exempt	modeled in 2025 analysis year

Reviewed at Oct 10, 2019 MITC-IAWG

Fiscal Year	Job Type		MPO	County	Responsible Agency	Project Name	Limits	Length	Project Description	Phase	Total Estimated Amount	Air Quality	Air Quality Comment
2030	Local		WESTPLAN	Muskegon	Muskegon County	Sternberg Road	Quarterline Road to Airline Road	1 mile	Reconstruct 2 to 3 lanes	CON	\$800,000	non-exempt	
2045	Local		WESTPLAN	Muskegon	Norton Shores	Henry Street	Seminole to Hile	1.25 miles	Reconstruct 2 to 3 lanes	CON	\$1,600,000	non-exempt	
2040	Local		WESTPLAN	Muskegon	North Muskegon	Witham Road	Bear Creek Bridge to Moulton Road	0.38 miles (2000 feet)	Reconstruct add left turn lane and storm sewer	CON	\$670,000	exempt	modeled
2045	Local		WESTPLAN	Muskegon	Norton Shores	Sternberg Road	Martin Road to Lake Harbor Road	2 miles	New two lane road	CON	\$2,200,000	non-exempt	
2045	Local		WESTPLAN	Muskegon	Norton Shores	Ponataluna Road	Grand Haven Road to Harvey	0.75 miles	Reconstruct 2 to 3 lanes	CON	\$1,600,000	non-exempt	
2045	Local		WESTPLAN	Muskegon	Norton Shores	Grand Haven Road	Hile to 100 ft south of Seaway	0.75 miles	Reconstruct 2 to 3 lanes	CON	\$1,100,000	non-exempt	
2045	Local		WESTPLAN	Muskegon	Norton Shores	Hile Road	Harvey Street to Grand Haven Road	0.75 miles	Reconstruct 2 to 3 lanes with bike lane	CON	\$1,600,000	non-exempt	