

Technical Memorandum

TO: Chattanooga Interagency Consultation Committee (ICC)

FROM: Betsy S. Evans, Chattanooga-Hamilton County/North Georgia (CHCNGA) Transportation Planning Organization (TPO)

DATE: June 2, 2011

SUBJECT: Chattanooga PM_{2.5} Nonattainment Area Conformity Determination Report (CDR) Addendum: Impacts of August 16, 2011 Proposed TIP Amendment for a Non-Exempt Project

Background

On April 5, 2005, the United States Environmental Protection Agency (U.S. EPA) designation of the Chattanooga nonattainment area for fine particulate matter (PM_{2.5}) under the 1997 annual PM_{2.5} standard became effective.¹ As a result of the PM_{2.5} nonattainment area designation, the Chattanooga TPO, in consultation with its interagency partners, must demonstrate that transportation planning activities conducted through development of the Chattanooga Long-Range Transportation Plan (LRTP) and Transportation Improvement Program (TIP) contribute to reduction of mobile source emissions and attainment and maintenance of the national PM_{2.5} air quality standard, as directed by the Federally mandated transportation conformity process.

The Chattanooga (TN-GA-AL) nonattainment area includes all of Hamilton County, Tennessee and all of Catoosa and Walker Counties in Georgia. Until recently, a portion of Jackson County in Alabama was also included in the PM_{2.5} nonattainment area. However, effective July 6, 2010, EPA issued a finding of insignificance for PM_{2.5} and NO_x for the Jackson County, Alabama portion of the tri-state nonattainment area. As a result, Alabama is no longer required to conduct regional emissions analyses. The CHCNGA

¹ The current Chattanooga nonattainment area designation is based on the 1997 annual PM_{2.5} standard of 15 ug/m³. Note that Chattanooga is in attainment for the 1997 24-hour PM_{2.5} standard of 65 ug/m³. The 1997 PM_{2.5} annual and 24-hour standards were promulgated in April 2005, with conformity required by April 2006. Effective December 18, 2006, the U.S. EPA promulgated a more stringent daily PM_{2.5} standard, reducing it from the current 65 ug/m³ to 35 ug/m³. Designations under the revised standard were finalized by U.S. EPA on October 8, 2009, with a 30-day effective date. The Chattanooga area meets the revised daily PM_{2.5} standard, and is not subject to nonattainment area designation under this standard.

TPO boundary includes all of Hamilton County, Tennessee and northern portions of Dade, Walker, and Catoosa Counties in North Georgia. The nonattainment portion of Georgia that is not within the TPO boundary is referred to as the Georgia donut area.

The current 2035 LRTP was adopted on February 16, 2010 with a corresponding positive conformity determination from the U.S. Department of Transportation (DOT) on March 5, 2010. During the conformity process, all projects were carefully evaluated for a realistic construction completion date to ensure that all construction projects expected to be complete by 2014 were modeled for the 2015 Tier and that there would be no impact to fiscal constraint. This technical memorandum is being initiated to demonstrate conformity for an amendment to the Fiscal Year (FY) 2011-2014 Chattanooga-Hamilton County/North Georgia TPO's Transportation Improvement Program (TIP) for one non-exempt project.

Introduction

This report constitutes a conformity determination being made on an air quality non-exempt project for a new phase being added to the FY 2011-2014 TIP. The TIP is the federally required short-range document that is a subset of, and implements the Long Range Transportation Plan (LRTP).

At the request of the Tennessee Department of Transportation (TDOT), the SR 317/ Apison Pike project (LRTP ID 17a) is being amended in the 2011-2014 TIP (#33042) as a result of the addition of a Right of Way (ROW) phase for 2012.

2011-2014 TIP Amendment Project Descriptions

Amendment to phasing to add the following for referenced project:

- A Right of Way (ROW) phase was added for 2012 with Surface Transportation Program (STP) State funds.

No amendment is being made to the project description of the referenced project. The project description remains as follows in the TIP and LRTP Tier 1 (2015):

- Widen from 2 to 4 lanes

This project is consistent with 2035 LRTP project description, length and termini as well as its implementation schedule in that the project is included in the 2015 (Tier 1) model year. As such, this project requires no new emissions analysis to demonstrate conformity.

Planning Assumptions

As noted above, the Chattanooga-Hamilton County/North Georgia TPO CDR for the 2035 LRTP was approved by the U.S. DOT and EPA in March of 2010. For an Amendment to the

TIP, the planning assumptions remain the same. The current planning assumptions are available at [http://www.chcrpa.org/TPO_\(reorganized\)/Plans_and_Programs/LRTP.htm](http://www.chcrpa.org/TPO_(reorganized)/Plans_and_Programs/LRTP.htm) under the “LRTP - Vol II Conformity Determination Report” link in Appendix B.

Emissions

Since the planning assumptions are remaining the same and there are no project changes which would require new emissions modeling, no new emissions analysis is needed.

Public Involvement and Interagency Consultation

The prior regional emissions analysis leading to U.S. DOT’s approval on March 5, 2010 complied with all federal and state requirements for interagency consultation and public involvement. This proposed amendment will undergo a 14-day public comment period per the Chattanooga-Hamilton County / North Georgia TPO public Participation Plan and any comments received will be provided as an Appendix to this report. The amendment process also includes the agreed upon Chattanooga Interagency Consultation Committee review and comment period of 14 calendar days.

Transportation Control Measures (TCMs)

The State Implementation Plan for the Chattanooga Region does not contain any Transportation Control Measures (TCMs).

Fiscal Constraint Analysis

The project included in this TIP Amendment is funded by available Surface Transportation Program (STP) State funds and therefore the TIP remains fiscally constrained.