

PM_{2.5} Conformity Hot-spot Analysis for Fairbanks, Alaska

November 24, 2010

Practical Overview

While a process is needed to meet the PM_{2.5} project-level requirements after December 14, 2010, it is unlikely to apply to most projects in the Fairbanks region because they are exempt from conformity. Few of the non-exempt projects are expected to exceed the 125,000 average daily traffic (AADT) levels or 8% diesel truck fraction thresholds. Additional criteria that could trigger project-level analysis include new highway projects and intersection projects with Level of Service (LOS) D, E, and F or significant increases in the number of diesel trucks or buses. Even though most projects will not require an air quality analysis, work will be required to document the status of each project to ensure that it is clear why the analysis requirements do not apply.

This document will be reviewed periodically and updated as necessary to reflect additional experience gained from implementation in Fairbanks, Alaska and/or new regulatory requirements or guidance issued by either EPA or FHWA.

Background

On March 10, 2006, the U.S. Environmental Protection Agency (EPA) published a final rule that establishes the transportation conformity criteria and procedures for determining which transportation projects must be analyzed for local air quality impacts in fine particulate matter (PM_{2.5}) and PM₁₀ nonattainment and maintenance areas. Project-level conformity determinations must be part of the final National Environmental Policy Act (NEPA) approval and/or other federal project authorizations for non-exempt projects. This document summarizes the proposed PM_{2.5} conformity hot-spot analysis process for Fairbanks, Alaska. The process is consistent with the March 10, 2006 final rule for hot-spot analyses¹ and EPA/FHWA guidance for implementing the requirements.² It is important to note that subsequent guidance released by FHWA in June 2009³ and EPA's March 24, 2010 conformity rule provide clarification in response to a legal challenge, but do not contain any substantive change to the requirements for project-level conformity determinations. The PM_{2.5} hot-spot analysis process is conducted in support of project-level conformity requirements, but does not fulfill all project-level conformity requirements (e.g., Carbon Monoxide, construction, mitigation).

¹ 47 FR 12468.

² "Transportation Conformity Guidance for Qualitative Hot-Spot Analyses in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas," March 2006, EPA 420-B-06-092

³ "Clarification to the 2006 Joint EPA/FHWA Transportation Conformity Guidance for Qualitative Hot-Spot Analysis in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas," FHWA, June 12, 2009

EPA designated Fairbanks nonattainment for the 2006 PM_{2.5} standard, effective December 14, 2009. Conformity for the PM_{2.5} standard applies one year after the effective date (i.e., December 14, 2010). After December 14, 2010, PM_{2.5} project-level conformity determinations must be made prior to final National Environmental Policy Act (NEPA) approval and/or other federal project authorizations for non-exempt projects. This applies to project authorizations made after December 14, even if the final NEPA approval was before December 14, 2010.

It is important to note that a portion of the Fairbanks/North Pole area is also designated a Carbon Monoxide (CO) Maintenance Area. Transportation projects located within the CO area will also need a CO project-level conformity analysis. The CO analysis should be submitted along with the PM_{2.5} Hot-Spot Analysis for interagency consultation. Transportation projects located within the “donut area” (geographic area outside the CO maintenance area boundary, but inside the PM_{2.5} nonattainment area boundary) do not require a corresponding CO project-level analysis.

Proposed Process

This PM_{2.5} Conformity Hot-Spot Analysis process should be used for any project that does not have an approved NEPA document in November 2010. This schedule should ensure no project delays.

Project sponsors are responsible for conducting the PM_{2.5} hot-spot analysis, as well as other project-level conformity requirements. The project sponsor should work with the Fairbanks Metropolitan Area Transportation System (FMATS) to process the PM hot-spot analysis through interagency consultation (IAC). The approach for completing the PM_{2.5} hot-spot analysis is outlined below.

1. Is the project exempt per Section 93.126 or 93.128 of the Conformity Rule?⁴
 - a. If Yes, no further analysis required and there is no need to complete PM_{2.5} hot-spot analysis form for IAC. Please be sure to note that the project is exempt from project-level conformity requirements in the environmental document.
 - b. If No, determine if project is 6004 assignable or not assignable by contacting Ben White, Statewide Environmental Manager for this determination, and proceed to step 2 below.⁵

⁴ Appendix B of the Draft PM_{2.5} Conformity Analysis contains a transportation project listing for the TIP and Donut Area that includes codes that identify exemptions from the requirement to determine conformity. It is important to note that codes 5.01–5.07 are not exempt from project-level requirements (e.g., Intersection Channelization Projects).

⁵ In 2009, DOT&PF and FHWA entered into an MOU that assigned FHWA’s responsibilities for environmental review, interagency consultation, and regulatory compliance for the review and/or approval of 6004 Categorical Exclusion (CE) projects to DOT&PF. Air quality conformity determinations for Section 6004 CE projects have also been assigned to DOT&PF. Therefore, FHWA concurrence is not

2. Is project “Project of Air Quality Concern”?

- a. Complete PM_{2.5} hot-spot analysis form. A list of transportation data needs is attached to the form to assist project sponsor when completing the supporting traffic impact studies.
- b. If No, submit form for IAC.
- c. If Yes, conduct qualitative analysis and submit both for IAC.

3. Documentation Processing

- a. Submit to FMATS to process through IAC:
 - i. 6004 projects, request EPA and DOT concurrence.
 - ii. Non-assignable projects, request EPA and FHWA concurrence.
- b. Respond to comments if necessary.
- c. Incorporate form and IAC documentation into air quality reports and related environmental documents.

Projects of Air Quality Concern (POAQC) are certain highway and transit projects that involve significant levels of diesel vehicle traffic, or any other project that is identified in the PM_{2.5} SIP as a localized air quality concern. EPA released Draft Quantitative PM Hotspot Analysis Guidance in May 2010; comments were due July 2010. Quantitative analysis will be required after the guidance is finalized and announced in the Federal Register, and the model grace period ends. It is anticipated that the guidance will be finalized and announced in the Fall of 2010 and be required to be used two years thereafter (i.e., Fall 2012).

The document “Transportation Conformity Guidance for Qualitative Hot-spot Analyses in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas” dated March 2006 discusses two methods for completing qualitative PM_{2.5} and PM₁₀ hot-spot analyses: (1) comparison to another location with similar characteristics, and (2) air quality studies for the proposed project location. When using the first method of the qualitative analysis, agencies should consult FHWA’s clarification to the March 2006 guidance released in June 2009.⁶ These methods are provided as examples only, and there may be other methods available. The comparison method is a simple approach that involves reviewing existing highway or transit facilities that were constructed in the past and built in locations similar to the proposed project. Air quality studies may also be appropriate to understand the potential air quality impact from certain projects. The hot-spot analysis should include sufficient documentation to justify the conclusion that a proposed project meets conformity hot-spot analysis requirements and should include a summary of the

required for Section 6004 projects. However, FHWA’s overall air quality conformity responsibilities may not be assigned to DOT&PF under the MOU; regional conformity and project-level conformity determinations for non-assignable projects continue to be the responsibility of FHWA.

⁶ FHWA, 2009. *op cit.*

method and data that were used. Note that qualitative analysis will continue until such time as quantitative analysis is required as mentioned in the preceding paragraph.

Project sponsors should complete the attached PM_{2.5} hot-spot analysis form for all non-exempt projects. Projects that have been determined to be POAQC need to have qualitative analysis attached for processing. Completed forms should be provided to FMATS for review and circulation to the IAC partners via e-mail; DOT&PF, Northern Region will develop required documentation for State projects and process directly for IAC.

The guidance should be reviewed carefully when determining whether a project is a POAQC. The requirements vary for existing facilities vs. new facilities. Supporting transportation data needs to be provided *for year open to traffic and MTP horizon year both with and without the project; a source must be provided for all data.* A list of transportation data needs is attached to the form to assist project sponsor when completing the supporting traffic impact studies. Note that the form also includes sections for “explanations and discussion” of the proposed project and associated impacts which may be used where detailed supporting traffic data is not readily available.

The FMATS IAC e-mail transmittal (a sample is included on the attached PM_{2.5} Hot-Spot Analysis Form) should request that the IAC partners, specifically EPA and FHWA or DOT&PF (as appropriate), concur with the assessment or submit comments within two weeks. Replies from the interagency partners should be submitted via “reply to all.” Under the NEPA delegation program of SAFETEA-LU, DOT&PF has been assigned responsibility for Section 6004 CE project-level air quality conformity determinations; therefore, FHWA concurrence is not required for Section 6004 projects. Please note that the opportunity for IAC and public comment can take 30 days or longer.

If interagency comments are received, the Summary Form and/or attached qualitative analysis should be revised accordingly. The revision should then be re-transmitted for IAC for concurrence.

Once the interagency process is complete, please refer to the DOT&PF Environmental Section Document Preparation information⁷ for guidance on completing the NEPA requirements for project-level conformity determinations. The documentation from the IAC process (i.e., Project Summary Form, IAC transmittal, IAC concurrence, or revisions in response to comments received) should be incorporated into the final air quality reports and related environmental documents that will be reviewed and approved by DOT&PF and/or FHWA.

DEFINITIONS

The final rule (40 CFR 93.123(b)(1)) defines the following as Projects of Air Quality Concern:

⁷ Available at <http://www.dot.state.ak.us/stwddes/desenviron/resources/docprep.shtml>

- (i) New highway projects that have a significant number of diesel vehicles, and expanded highway projects that have a significant increase in the number of diesel vehicles;⁸
- (ii) Projects affecting intersections that are at LOS D, E, or F with a significant number of diesel vehicles, or those that will change to LOS D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project;⁸
- (iii) New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location;
- (iv) Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles⁹ congregating at a single location; and
- (v) Projects in or affecting locations, areas, or categories of sites that are identified in the PM_{2.5} and PM₁₀ implementation plan or implementation plan submission, as sites of possible violation.

According to the Environmental Protection Agency Transportation Conformity Guidance (final rule), March 10, 2006, the following are examples of Projects of Air Quality Concern:

- (i) A project on a new highway or expressway that serves a significant volume of diesel truck traffic, such as a facility with greater than 125,000 annual average daily traffic (AADT) and 8% or more of such AADT is diesel truck traffic;
- (ii) New exit ramps and other highway facility improvements to connect a highway or expressway to a major freight, bus, or intermodal terminal;
- (iii) Expansion of an existing highway or other facility that affects a congested intersection (operated at LOS D, E, or F) that has a significant increase in the number of diesel trucks;⁹ and
- (iv) Similar highway projects that involve a significant increase in the number of diesel transit busses and/or diesel trucks.⁹

⁸ The EPA Office of Transportation and Air Quality (OTAQ) has indicated that a “significant” increase in the number of diesel vehicles may be defined as a 10% increase in the build vs. no-build in any analysis year, and therefore would be a Project of Air Quality Concern. An increase less than 5% would not be considered the “significant,” whereas an increase in the range of 5 to 10% would require supporting justification that project is not a Project of Air Quality Concern. It is important to note that this interpretation does not address facility type or Volume/Capacity ratio.

⁹ See Footnote 8.

The March 2006 final rule also provided examples of projects that would not require a PM_{2.5} or PM₁₀ hot-spot analysis (71 FR 12491). Listed below are examples of projects that are not an air quality concern under 40 CFR 93.123(b)(1)(i) and (ii).

- (i) Any new or expanded highway project that primarily services gasoline vehicle traffic (i.e., does not involve a significant number or increase in the number of diesel vehicles), including such projects involving congested intersections operating at LOS D, E, or F;
- (ii) An intersection channelization project or interchange configuration project that involves either turn lanes or slots, or lanes or movements that are physically separated. These kinds of projects improve freeway operations by smoothing traffic flow and vehicle speeds by improving weave and merge operations, which would not be expected to create or worsen PM_{2.5} or PM₁₀ violations; and
- (iii) Intersection channelization projects, traffic circles or roundabouts, intersection signalization projects at individual intersections, and interchange reconfiguration projects that are designed to improve traffic flow and vehicle speeds, and do not involve any increases in idling. Thus, they would be expected to have a neutral or positive influence on PM_{2.5} or PM₁₀ emissions.

The following are examples of projects that are not an air quality concern under 40 CFR 93.123(b)(1)(iii) and (iv):

- (i) A new or an expanded bus terminal that is serviced by non-diesel vehicles (e.g., compressed natural gas) or hybrid-electric vehicles; and
- (ii) A 50% increase in daily arrivals at a small terminal (e.g., a facility with 10 buses in the peak hour).

The following table summarized the EPA definitions and examples listed above.

Table 1			
Summary of EPA Definitions and Examples from Rule and Guidance			
Project Type	Criteria	POAQC Example	NOT a POAQC Example
New highway or expressway	Significant number of diesel vehicles	AADT > 125,000 and >= 8% (10,000) diesel truck traffic	Primarily services gasoline traffic
Highway/expressway expansion	Significant <i>increase</i> in diesel vehicles	Build increases diesel truck AADT by 10% over No-build	Primarily services gasoline traffic
Affecting intersections at LOS D, E or F	Significant number of diesel vehicles	Build increases diesel truck AADT by 10% over No-build	Project that affects a congested intersection that primarily services gasoline traffic
Changing intersections to LOS D, E or F	Significant number of diesel vehicles	Build increases diesel truck AADT by 10% over No-build	Project that does not attract diesel vehicles
New bus or rail terminal	Significant number of diesel vehicles	A new intermodal facility	A new bus terminal that is serviced by non-diesel vehicles (e.g., CNG, hybrids)
Bus or rail terminal expansion	Significant <i>increase</i> in diesel vehicles	Build increases diesel truck AADT by 10% over No-build	An expanded bus terminal that is serviced by non-diesel vehicles (e.g., CNG, hybrids)
Connector (e.g., exit ramp) between highway and major freight, bus, or intermodal terminal	--	Self explanatory	--
Located in or affecting locations that are possible PM _{2.5} violation sites	--	To be determined after SIP developed	Intersection channelization, configuration, signalization, re-configuration projects that improve traffic flow

Links to more information:

FHWA Transportation Conformity Website:

<http://www.fhwa.dot.gov/environment/conform.htm>

FHWA Project-Level Conformity Website, including guidance on developing qualitative hot-spot analyses: *<http://www.fhwa.dot.gov/environment/conformity/project.htm>*

EPA Transportation Conformity Website:

<http://www.epa.gov/otaq/stateresources/transconf/index.htm>

PM Hot-Spot Analysis

Project Summary Form for Interagency Consultation (IAC)

The purpose of this form is to provide sufficient information to receive concurrence from the IAC partners in Fairbanks, Alaska on the PM_{2.5} hot-spot analysis and POAQC determination.

The form is not required under the following circumstances:

1. The project does not require a project-level PM hot spot analysis since it:
 - a. Is exempt pursuant to 40 CFR 93.126 (see footnote 4 above); or
 - b. Is a traffic signal synchronization project under 40 CFR 93.128; or
 - c. Uses no federal funds and requires no federal approval.

It is the responsibility of the project sponsor to ensure that the form is filled out completely and provides a sufficient level of detail for the IAC partners to make an informed decision. For example, the IAC partners will be reviewing the effects of the project, and thus part of the required information includes build/no build traffic data. A list of transportation data needs is attached to the form to assist project sponsor when completing the supporting traffic impact studies. Note that the form also includes sections for “explanations and discussion” of the proposed project and associated impacts which may be used where detailed supporting traffic data is not readily available.

Instructions:

1. **Fill out form in its entirety using the fillable pdf file.**
2. **Be sure to include AKSAS ID#.**
3. **Provide a source for all traffic data used on the form.**
4. **Submit completed form to FMATS Coordinator. The MPO will review the form for accuracy and transmit to the IAC partners. DOT&PF, Northern Region projects can be submitted by the DOT&PF representative .**

TABLE 1
Type of Project

- | |
|---|
| <ol style="list-style-type: none">1. New highway2. Change to existing state highway3. New regionally significant street4. Change to existing regionally significant street5. Intersection channelization projects6. Intersection signalization projects at individual intersections7. Interchange reconfiguration projects8. Changes in vertical and horizontal alignment9. Truck size and weight inspection stations10. Bus terminals and transfer points |
|---|

Fairbanks, Alaska PM_{2.5} Hot-Spot Analysis Form for Interagency Consultation

Date:		
AKSAS ID# (required):		FHWA ID# (if applicable):
Federally Approved TIP (title/date):		Federally Approved MTP (title/date):
Federally Approved Conformity Determination (title/date):		
Project Description (clearly describe project):		
Type of Project (use Table 1 on instruction sheet):		
Narrative Location/Route & Postmiles:		
Borough:		Lead Agency:
Contact Person (name/title):		
Phone Number:	Fax Number:	Email Address:
Project of Air Quality Concern (check one): <input type="checkbox"/> Yes <input type="checkbox"/> No If "YES," attach qualitative analysis.		

Federal Action for which PM Hot-spot Analysis is Needed (check appropriate box):

- Categorical Exclusion (NEPA) FONSI or Final EIS Other
 EA or Draft EIS PS&E or Construction

Scheduled Date of Federal Action:

NEPA Delegation – Project Type (check appropriate box):

- Exempt Section 6004 – Categorical Exclusion Non Assignable – Non-Categorical Exclusion

Current Programming Dates (as appropriate):

	PE/Environmental	ENG	ROW	CON
Start				
End				

Project Purpose and Need (Summary): (attach additional sheets as necessary):

Surrounding Land Use/Traffic Generators (especially effect on diesel traffic):

Opening Year: Build and No Build LOS, AADT, Diesel Truck%, Diesel Truck AADT of proposed facility

Facility Name:

Year:

	LOS	AADT	Diesel Truck Percent	Diesel Truck AADT
Build				
No-Build				
Data Source(s)				

MTP Horizon Year: Build and No Build LOS, AADT, Diesel Truck %. Diesel Truck AADT of proposed facility

Facility Name

Year

	LOS	AADT	Diesel Truck Percent	Diesel Truck AADT
Build				
No-Build				
Data Source(s)				

Opening Year: If facility is an interchange(s) or intersection(s), Build and No Build cross-street AADT, Diesel Truck%, Diesel Truck AADT

Facility Name

Year

	LOS	AADT	Diesel Truck Percent	Diesel Truck AADT
Build				
No-Build				

Data Source(s)

MTP Horizon Year: If facility is an interchange (s) or intersection(s), Build and No Build cross-street AADT, Diesel Truck%, Diesel Truck AADT

Facility Name

Year

	LOS	AADT	Diesel Truck Percent	Diesel Truck AADT
Build				
No-Build				

Data Source(s)

Describe potential traffic redistribution effects of congestion relief (impact on other facilities):

Comments/Explanation/Details (attach additional sheets as necessary):

List of Data Needs
for Fairbanks, Alaska PM2.5 Hot-Spot Analysis Form for Interagency Consultation
(to be provided by the supporting traffic impact studies)

Analysis years:

Open to traffic
MTP horizon year

Scenarios:

Build (or with project)
No-build (or without project)

Traffic data:

Level of service (LOS)

Annual average daily traffic (AADT)

Diesel truck percent

- May be calculated based on AADT provided below
- May be estimated for local facilities using fleet mix in the absence of other data

Diesel truck AADT

- May be calculated based on assumed truck percentage above
- May be estimated for local facilities using fleet mix in the absence of other data

Note: if facility is an interchange or intersection, the traffic data should be provided for the cross-street as well.

**SAMPLE FMATS TRANSMITTAL FOR PM_{2.5} HOT-SPOT ANALYSIS FORM
(VIA E-MAIL TO THE IAC PARTNERS)**

Recommended Subject Line: PM_{2.5} Hot-spot Analysis Form for IAC Review & Concurrence for [INSERT Project Name & AKSAS ID # + Type 6004/non-assignable CE/EA/EIS as appropriate]

Recommended File Name: PM_{2.5} Hot-spot Analysis Form for [INSERT Project Name & AKSAS ID #]

The [INSERT Project Sponsor] has prepared the attached PM_{2.5} Hot-spot Analysis Form for interagency consultation for the [INSERT Project Name and AKSAS ID# + Type 6004/non-assignable CE/EA/EIS]. The [INSERT Project Sponsor] has determined that the project is NOT a project of air quality concern [OR “The Project Sponsor has determined that the project is a project of air quality concern and the corresponding qualitative analysis is attached.”]

While all of the interagency consultation partners are encouraged to reply to this email to confirm their concurrence [OR concurrence on approach and findings of the qualitative analysis] or provide comments by [INSERT date and time (minimum 2 weeks)], a response from [SELECT one: EPA & DOTP&F or EPA & FHWA] is requested; no response will be assumed to be concurrence. A conference call will be conducted upon request. Please contact [INSERT MPO Staff Contact] if you have questions or need additional information.

Example completed form:

SAMPLE

Fairbanks, Alaska PM_{2.5} Hot-Spot Analysis Form for Interagency Consultation

Date: 9/21/10		
AKSAS ID# (required): 63213		FHWA ID# (if applicable): RS-M-0617(3)
Federally Approved TIP (title/date): FMATS 2010 – 2013 TIP, Amendment #2, 7.21.10		Federally Approved MTP (title/date): FMATS 2010 – 2035 MTP, 7.10
Federally Approved Conformity Determination (title/date): Air Quality / Transportation Plan CO Conformity Fairbanks Maintenance Area 2010 LRTP/TIP, 8.5.10		
Project Description (clearly describe project): Widening of University Avenue to five lanes between Mitchell Expressway and College Road, and intersection improvements at Airport Way and Geist Road.		
Type of Project (use Table 1 on instruction sheet): Change to existing regionally significant street & intersection signalization and reconfigurations.		
Narrative Location/Route & Postmiles: University Avenue is the major north-south transportation corridor on the west side of Fairbanks. Project proposes to reconstruct University Avenue from just north of the Mitchell Expressway to Thomas Street, a length of 2.12 miles.		
Borough: Fairbanks North Star		Lead Agency: DOT & PF
Contact Person (name/title): Bruce Campbell		
Phone Number: 907.451.2238	Fax Number:	Email Address: bruce_campbell@alaska.gov
Project of Air Quality Concern (check one): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "YES," attach qualitative analysis.		

Federal Action for which PM Hot-spot Analysis is Needed (check appropriate box):

- Categorical Exclusion (NEPA) FONSI or Final EIS Other
 EA or Draft EIS PS&E or Construction

Scheduled Date of Federal Action: Unknown

NEPA Delegation – Project Type (check appropriate box):

- Exempt Section 6004 – Categorical Exemption Non Assignable – Non-Categorical Exemption

Current Programming Dates (as appropriate):

	PE/Environmental	ENG	ROW	CON
Start				2014-2015
End	2005	2013	2006	

Project Purpose and Need (Summary): (attach additional sheets as necessary):

The purpose of the project is to:

- Improve safety for motorists
- Improve safety for pedestrians and bicyclists
- Provide efficient movement of traffic
- Replace deficient facilities

Surrounding Land Use/Traffic Generators (especially effect on diesel traffic):

Land use along the corridor is changing from residential and undeveloped property to commercial. Residential property is being rezoned to commercial and professional business use. Traffic generators include schools, Fairbanks International Airport, retail establishments, government agencies, professional business and restaurant establishments, and the Chena River State Recreation Site.

Opening Year: Build and No Build LOS, AADT, Diesel Truck%, Diesel Truck AADT of proposed facility

Facility Name: University Avenue

Year: 2015

	LOS	AA DT	Diesel Truck Percent	Diesel Truck AADT
Build	C or better	24600	< 6%	Not Available (N/)
No-Build	D	N/A	N/A	N/A
Data Source(s)	EA			

MTP Horizon Year: Build and No Build LOS, AADT, Diesel Truck %. Diesel Truck AADT of proposed facility

Facility Name University Avenue

Year 2035

	LOS	AA DT	Diesel Truck Percent	Diesel Truck AADT
Build	C or better	29200	< 6%	N/A
No-Build	D	N/A	N/A	N/A
Data Source(s)	EA			

Opening Year: If facility is an interchange(s) or intersection(s), Build and No Build cross-street AADT, Diesel Truck%, Diesel Truck AADT

Facility Name

Year

	LOS	AADT	Diesel Truck Percent	Diesel Truck AADT
Build				
No-Build				
Data Source(s)	Not Available			

MTP Horizon Year / Design Year: If facility is an interchange (s) or intersection(s), Build and No Build cross-street AADT, Diesel Truck%, Diesel Truck AADT

Facility Name

Year

	LOS	AADT	Diesel Truck Percent	Diesel Truck AADT
Build				
No-Build				
Data Source(s)	Not Available			

Describe potential traffic redistribution effects of congestion relief (impact on other facilities):

Project focus is to improve safety and reduce traffic conflicts with increasing traffic volumes.

Comments/Explanation/Details (attach additional sheets as necessary):

The project has been determined to be a project NOT of air quality concern for the following reasons:

- AADT < 125,000
- LOS improves to C or better
- Heavy-duty diesel truck traffic < 8% and no significant increase in diesel trucks due to project
- Intersection improvements include signals and turn lanes, which are examples of projects NOT of air quality concern per 40 CFR 93.123(b)(1)(i) and (ii).

The proposed project meets the Clean Air Act requirements and 40 CFR 93.116 without an explicit hot-spot analysis.