

**MEMORANDUM REPORT NO. 217**  
**(Appendix D: June 2015 Update)**  
**(Appendix E: September 2015 Update)**

# **ASSESSMENT OF CONFORMITY OF THE YEAR 2035 REGIONAL TRANSPORTATION PLAN AND THE YEAR 2013-2016 TRANSPORTATION IMPROVEMENT PROGRAM FOR THE 2008 EIGHT-HOUR OZONE AND 2006 24-HOUR FINE PARTICULATE NATIONAL AMBIENT AIR QUALITY STANDARDS**

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ASSESSMENT OF CONFORMITY OF THE YEAR 2035 REGIONAL TRANSPORTATION PLAN  
AND THE YEAR 2013-2016 TRANSPORTATION IMPROVEMENT PROGRAM  
FOR THE 2008 EIGHT-HOUR OZONE AND 2006 24-HOUR FINE PARTICULATE  
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U.S. Department of Transportation  
**Federal Highway Administration**



U.S. Department of Transportation  
**Federal Transit Administration**



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Southeastern Wisconsin Regional Planning Commission

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TRANSPORTATION PLAN AND THE YEAR 2013-2016 TRANSPORTATION  
IMPROVEMENT PROGRAM FOR THE 2008 EIGHT-HOUR OZONE AND 2006 24-  
HOUR FINE PARTICULATE (PM<sub>2.5</sub>) NATIONAL AMBIENT AIR QUALITY  
STANDARDS**

**INTRODUCTION**

This report is intended to provide the basis for a determination that the fiscally constrained year 2035 regional transportation plan (RTP) and also the year 2013-2016 transportation improvement program (TIP) are in conformance with the 2008 eight-hour ozone national ambient air quality standards (NAAQS) and interim emission analyses described in 40 CFR 93.119 for the Wisconsin portion of the Chicago-Naperville, IL-IN-WI marginal nonattainment area<sup>1</sup>, and the maintenance plan for the 2006 24-hour fine particulate (PM<sub>2.5</sub>) NAAQS for the three-county maintenance area consisting of Milwaukee, Racine, and Waukesha Counties. The report is also intended to demonstrate that the year 2013-2016 TIP continues to serve to implement the RTP.<sup>2</sup>

This finding of conformity is for the 2008 eight-hour ozone NAAQS for the Wisconsin portion of the Chicago-Naperville, IL-IN-WI marginal nonattainment area, consisting of that portion of Kenosha County east of IH 94, and the for the three-county nonattainment area for the 2006 24-hour PM<sub>2.5</sub> NAAQS within Southeastern Wisconsin consisting of Milwaukee, Racine, and Waukesha Counties. Map 1 shows the nonattainment and maintenance areas within Southeastern Wisconsin.

The United States Environmental Protection Agency (USEPA), on October 9, 2009, designated a three-county (Milwaukee, Racine, and Waukesha) PM<sub>2.5</sub> nonattainment area. In June 2012, the Wisconsin Department of Natural Resources (WDNR) submitted, a redesignation request and maintenance plan for air quality under the 2006 24-hour PM<sub>2.5</sub> NAAQS for the three-county PM<sub>2.5</sub> nonattainment area which established motor vehicle emission budgets (MVEB) for volatile organic compounds (VOC), Nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), and PM<sub>2.5</sub> for the years 2020 and 2025, which are based on the MOVES2010a emissions model. Effective April 22, 2014, USEPA has approved the maintenance plan and the three-county 2006 24-hour PM<sub>2.5</sub> nonattainment area has been redesignated as attaining the 2006 24-hour PM<sub>2.5</sub> NAAQS. With this approval and redesignation, the MVEBs have been determined to be adequate for the demonstration of transportation conformity.

The United States Environmental Protection Agency (USEPA), on May 31, 2012, designated Kenosha County east of IH 94 as being in nonattainment of the 2008 eight-hour ozone NAAQS and included this area in the larger Chicago-Naperville, IL-IN-WI marginal nonattainment area. As there is no approved state implementation plan with attendant MVEBs, this conformity analysis will be conducted using a build (action scenario) no greater than baseline

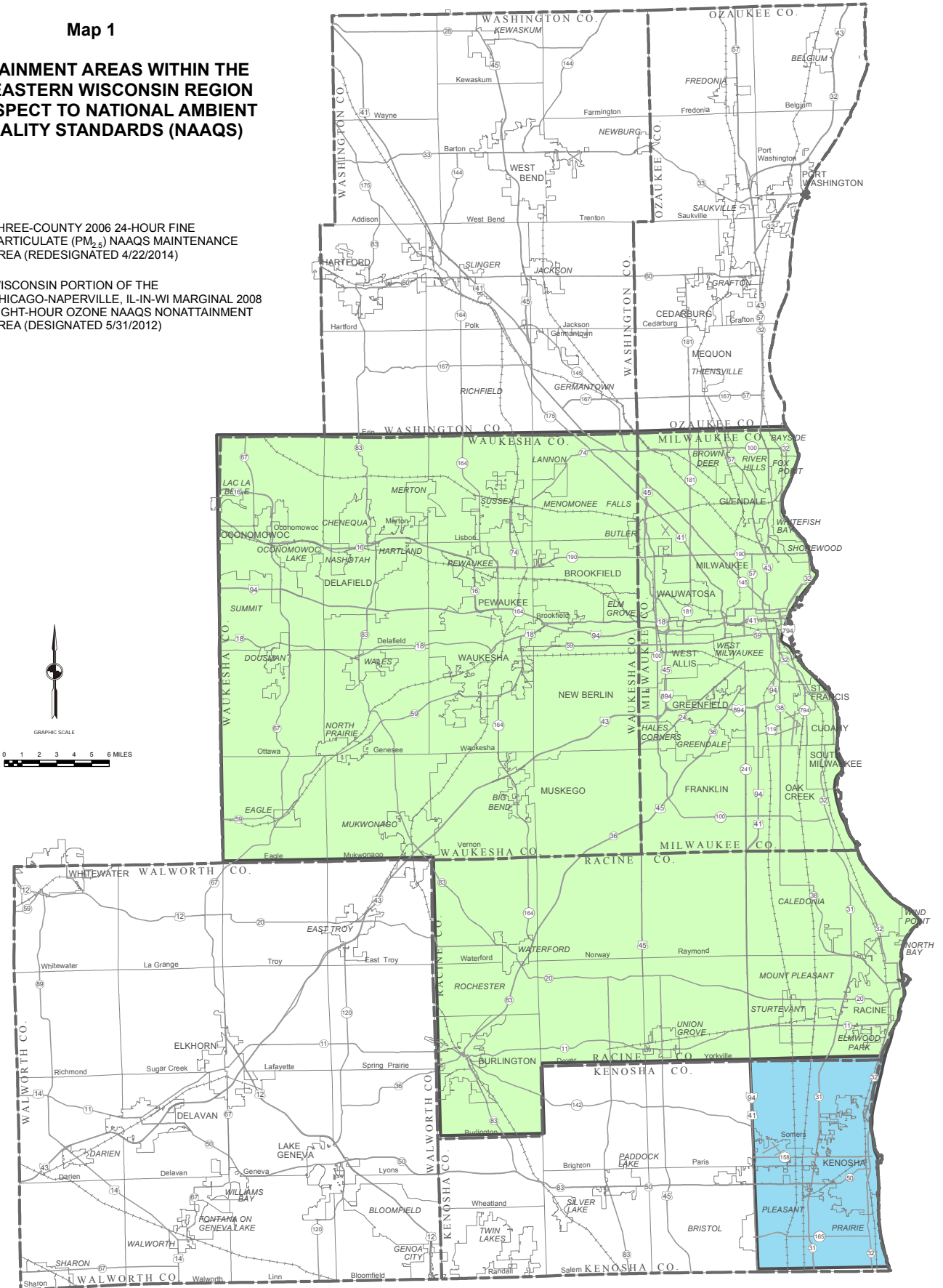
<sup>1</sup> *The Wisconsin portion of the Chicago-Naperville, IL-IN-WI marginal ozone nonattainment area for the 2008 eight-hour ozone NAAQS consisting of that portion of Kenosha County east of IH 94.*

<sup>2</sup> *The regional transportation plan is documented in SEWRPC Planning Report No. 49, A Regional Transportation System Plan for Southeastern Wisconsin: 2035 and SEWRPC Memorandum Report Number 215, Review and Update of the Year 2035 Regional Transportation Plan. The 2013-2016 Transportation Improvement Program is documented in a report entitled, A Transportation Improvement Program for Southeastern Wisconsin: 2013-2016.*

**Map 1**

**NONATTAINMENT AREAS WITHIN THE SOUTHEASTERN WISCONSIN REGION WITH RESPECT TO NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS)**

- THREE-COUNTY 2006 24-HOUR FINE PARTICULATE (PM<sub>2.5</sub>) NAAQS MAINTENANCE AREA (REDESIGNATED 4/22/2014)
- WISCONSIN PORTION OF THE CHICAGO-NAPERVILLE, IL-IN-WI MARGINAL 2008 EIGHT-HOUR OZONE NAAQS NONATTAINMENT AREA (DESIGNATED 5/31/2012)



Source: SEWRPC



test consistent with 40 CFR 93.119. The attendant emissions estimate for the baseline will be for the year 2011 and will be based on traffic count data published annually by the Wisconsin Department of Transportation (WisDOT).

USEPA and the U.S. Department of Transportation (USDOT) have established criteria and procedures to be used by a Metropolitan Planning Organization (MPO) in making conformity determinations of RTPs and TIPs. The Southeastern Wisconsin Regional Planning Commission (SEWRPC) is the gubernatorially designated Federal MPO for the Kenosha, Milwaukee, Racine, the Wisconsin portion of the Round Lake Beach, and West Bend urbanized areas. The conformity criteria established by USEPA are set forth in the Federal Register (40CFR Part 51), and the criteria with respect to ozone and PM<sub>2.5</sub> precursors apply to Southeastern Wisconsin. These Federal regulations identify the conformity criteria which should be applied at this time with respect to the Wisconsin portion of the Chicago-Naperville, IL-IN-WI marginal ozone nonattainment area (2008 eight-hour ozone NAAQS), and the three-county PM<sub>2.5</sub> maintenance area (2006 24-hour PM<sub>2.5</sub> NAAQS).

In addition to the Federal regulations governing the RTP and TIP conformity, SEWRPC, WDNR, and the Wisconsin Department of Transportation (WisDOT) have adopted a memorandum of agreement regarding the conduct of RTP and TIP conformity determinations, which was approved by USEPA and became effective on April 22, 2013. Appendix A provides a summary of the interagency agreement on the conformity criteria and tests which should be applied in this conformity determination. The principal agencies involved were SEWRPC, WisDOT, WDNR, USDOT, Federal Highway Administration and Federal Transit Administration, and USEPA. The conformity criteria to be applied to the three-county maintenance area under the 2006 24-hour PM<sub>2.5</sub> NAAQS with respect to VOC, NO<sub>x</sub>, SO<sub>2</sub>, and PM<sub>2.5</sub> requires the satisfaction of emissions budget tests described in 40 CFR 93.118; and the Wisconsin portion of the Chicago-Naperville, IL-IN-WI marginal ozone nonattainment area under the 2008 eight-hour ozone NAAQS with respect to VOC and NO<sub>x</sub> requires satisfaction of interim emission tests described in 40 CFR 93.119. This conformity demonstration is also intended to satisfy the requirement that conformity of the plan and TIP be demonstrated within two years of a maintenance plan approval or a budget or budgets being determined adequate by USEPA.

The next section of this report describes the fiscally-constrained year 2035 RTP for the seven-county Southeastern Wisconsin Region. The following section summarizes the 2013-2016 TIP which implements the plan. The remaining sections of this report then identify the specific conformity procedure requirements and conformity determination criteria which have been established by USEPA for use in the determination of RTP and improvement program conformity. These sections also indicate the extent to which the conformity analysis, RTP, and the TIP meet each of these requirements and criteria. The assessment of conformity with respect to each requirement and criterion concludes that the fiscally-constrained year 2035 RTP and the 2013-2016 TIP are in conformance with the maintenance plan for the three-county maintenance area for the 2006 24-hour PM<sub>2.5</sub> NAAQS and the interim emission tests for the Wisconsin portion of the Chicago-Naperville, IL-IN-WI 2008 marginal ozone nonattainment area for the 2008 eight-hour ozone NAAQS.

It is important to note that the RTP, TIP, and maintenance plan, have been prepared in a cooperative manner by the Commission and WDNR. The preparation of the RTP and maintenance plan has been extensively coordinated. The forecasts of vehicle-miles of travel (VMT) and air pollutant emissions utilized in the preparation of the RTP were based on the official Commission intermediate growth forecasts for the year 2035, and the forecasts of emissions under the maintenance plan for the 2006 24-hour PM<sub>2.5</sub> NAAQS were based on alternative high growth VMT and emissions forecasts under the year 2035 RTP, and increased by 7.5 percent to account for uncertainty in transportation emissions forecasts. Vehicle fleet, fuels, and meteorology inputs, which the Commission utilized to run USEPA's MOVES2010b emission model and estimate air pollutant emissions in the preparation of this conformity assessment of the RTP and TIP were provided by WDNR. This conformity analysis includes the emission reduction benefits attendant to Tier 2 motor vehicle and low sulfur fuel regulations. The MOVES model inputs which were used to establish the transportation emission budgets in the PM<sub>2.5</sub> maintenance plan also did

account for the emission reduction benefits attendant to these more recent regulations. In addition, WDNR has relied upon the RTP for the identification and evaluation of potential transportation control measures considered for incorporation into the maintenance plan.

## **REGIONAL TRANSPORTATION SYSTEM PLAN FOR SOUTHEASTERN WISCONSIN**

The design year 2035 RTP is documented in SEWRPC Report No. 49, *A Regional Transportation System Plan for Southeastern Wisconsin: 2035*, and SEWRPC Memorandum Report 215, *Review and Update of the Year 2035 Regional Transportation Plan*. The RTP is based upon a regional land use plan<sup>3</sup> that seeks to preserve the Region's best natural areas, preserve the Region's prime, most productive farmland, and accommodate new urban development within and around existing urban development as infill development, through redevelopment, and through the orderly expansion of planned urban service areas on lands proximate to these centers. The RTP is designed to serve the regional land use plan and not a projection of current land use development trends toward further decentralization of population, employment, and urban land uses. Thus if transportation facilities and services do indeed shape land use development, implementation of the RTP should promote implementation of the land use plan, which recommends a desirable pattern of future land use with respect to travel requirements.

The RTP has been developed to meet the requirements of a Federally defined congestion management system<sup>4</sup>, including the definition of performance measures to establish congestion problems and to assist in the evaluation of alternative measures to address congestion and the evaluation and recommendation of alternative measures to resolve the identified congestion problems. The development and evaluation of transportation alternatives which would address existing and anticipated future traffic congestion problems was done in a disciplined way so as to ensure that highway capacity expansion projects were proposed for inclusion in the plan only as a last resort. Appropriate, detailed, quantified attention was paid to determining the extent to which a wide variety of transportation system management measures, including land use, traffic management, and transit, could be used to resolve congestion problems. Once that extent was determined, highway capacity improvement proposals were placed into the plan to resolve many, but not all, of the residual congestion problems. The implementation of the recommended transportation actions and their effectiveness, and performance of the transportation system is assessed on a four-year cycle along with RTP reaffirmation. This conformity assessment is being conducted as part of the 2014 quadrennial review and update of the year 2035 RTP. The first quadrennial review and update was completed in June 2010.

The RTP has been developed to be fiscally constrained, pursuant to USDOT metropolitan planning regulations (23CFR Part 450) and USEPA conformity regulations (40 CFR Part 93.108). The total costs of the transportation plan, including both capital and operating costs, have been estimated and compared to existing available and reasonably expected Federal, State, and local revenues. The conclusions reached in 2005, when the 2035 plan was initially adopted, and again in 2010 when that plan was first reviewed and updated, was that the plan recommendations were reasonably consistent with existing and reasonably expected to be available revenues. This conclusion is no longer possible given the elimination of motor fuel tax indexing and the failure of RTA legislation. The gap in funding constitutes an approximately 23 percent shortfall in year of expenditure dollars. As a result, in order to meet Federal regulations, the original year 2035 RTP is now considered to be a "vision" plan, outlining the desirable transportation system improvements believed to be necessary to address the current and future transportation needs of the Region. In addition, it is necessary to identify a "fiscally constrained" year 2035 RTP which includes those elements of the 2035 plan which likely can be achieved within the restrictions of the

<sup>3</sup> As documented in SEWRPC Planning Report 48, *A Regional Land Use Plan for Southeastern Wisconsin: 2035*

<sup>4</sup> The Commission's congestion management process is documented in SEWRPC Memorandum Report number 203, *A Congestion Management Process for Southeastern Wisconsin*.

amounts and limitations of existing and reasonably expected to be available revenues. Both the “vision” and “fiscally constrained” plans are documented in Chapter 6 of SEWRPC Memorandum Report 215, *Review and Update of the Year 2035 Regional Transportation Plan*. The following describes the fiscally constrained plan, which can be found at the Commission’s website ([www.sewrpc.org/2014update](http://www.sewrpc.org/2014update)).

### **Fiscally-Constrained Transportation System Plan**

As noted earlier, the estimated costs of implementing the vision RTP exceeds the existing and reasonably expected revenues available to implement the plan. This gap in funding affects the implementation of both highway and transit elements identified in the vision RTP. The other elements of the vision RTP are expected to be implemented within the current and reasonably expected revenues. The implications of the funding gap for the highway element of the 2035 Vision RTP differs from the transit element as highway expenditures are largely capital expenditures and transit expenditures are largely operating expenditures. The effect on the highway element is a deferral or delay in capital projects being implemented, specifically a reduction in the amount of freeway that can be reconstructed and the amount of surface arterials that can be reconstructed with additional traffic lanes or newly constructed by the year 2035. The principal effect on the transit element is a lack of the transit improvement and expansion identified under the 2035 Vision RTP, and as well reductions in current transit service and an increase in transit fares above inflation.

#### *Fiscally-Constrained Arterial Street and Highway Element*

Under the Year 2035 Fiscally Constrained RTP, 90 miles of freeway reconstruction, including 87 miles of freeway widening, recommended under the Year 2035 Vision RTP would be expected to be implemented by the year 2035 based on the cost of these improvements compared to existing and future reasonably to be expected available revenue. Map 2 shows the segments of the freeway system that would be expected to be reconstructed by the year 2035 based on existing and reasonably expected revenues, and the segments of freeway that would be expected to be deferred until beyond 2035. Additionally, all of the surface arterial capacity expansion recommended in the Year 2035 Vision RTP is included in the fiscally constrained plan, with the exception of the planned extension of the Lake Parkway between Edgerton Avenue and STH 100 in Milwaukee County. These reductions would result in approximately 90 percent, or 3,301 of the total 3,656 route-miles, of the planned arterial street in highway system being recommended to be resurfaced and reconstructed to their same capacity under the Year 2035 Fiscally Constrained RTP. Approximately 283 route-miles, or 8 percent of the total year 2035 arterial street and highway system are recommended for widening as part of their reconstruction to provide additional through traffic lanes. The remaining 72 route-miles, or about 2 percent of the total arterial system mileage, are proposed new arterial facilities. The proposed arterial street and highway capacity improvements—both freeway and surface arterial—under the recommended fiscally constrained regional transportation plan are shown in Map 3 and are listed in Table 1. These arterial highway capacity improvement and expansion recommendations represent all highway plan element projects with potential air quality impact and which are referred to in the Federal regulations as "nonexempt" projects. Table 1 also presents the anticipated implementation stages for all highway capacity improvement and expansion recommended under the plan; more specifically, the planned capacity improvement and expansion to be open to traffic by the years 2015, 2020, 2025, and 2035 are identified. Table 2 summarizes the mileage of system improvement and expansion anticipated to be implemented by 2015, 2020, 2025, and 2035. Given the potential for individual projects to be deferred or advanced due to considerations such as right-of-way acquisition, the anticipated implementation schedule for the plan is considered to be the mileage of county and local arterial system improvement and expansion, and the mileage of state trunk highway improvement and expansion as set forth in Table 2.

#### *Fiscally-Constrained Public Transit Element*

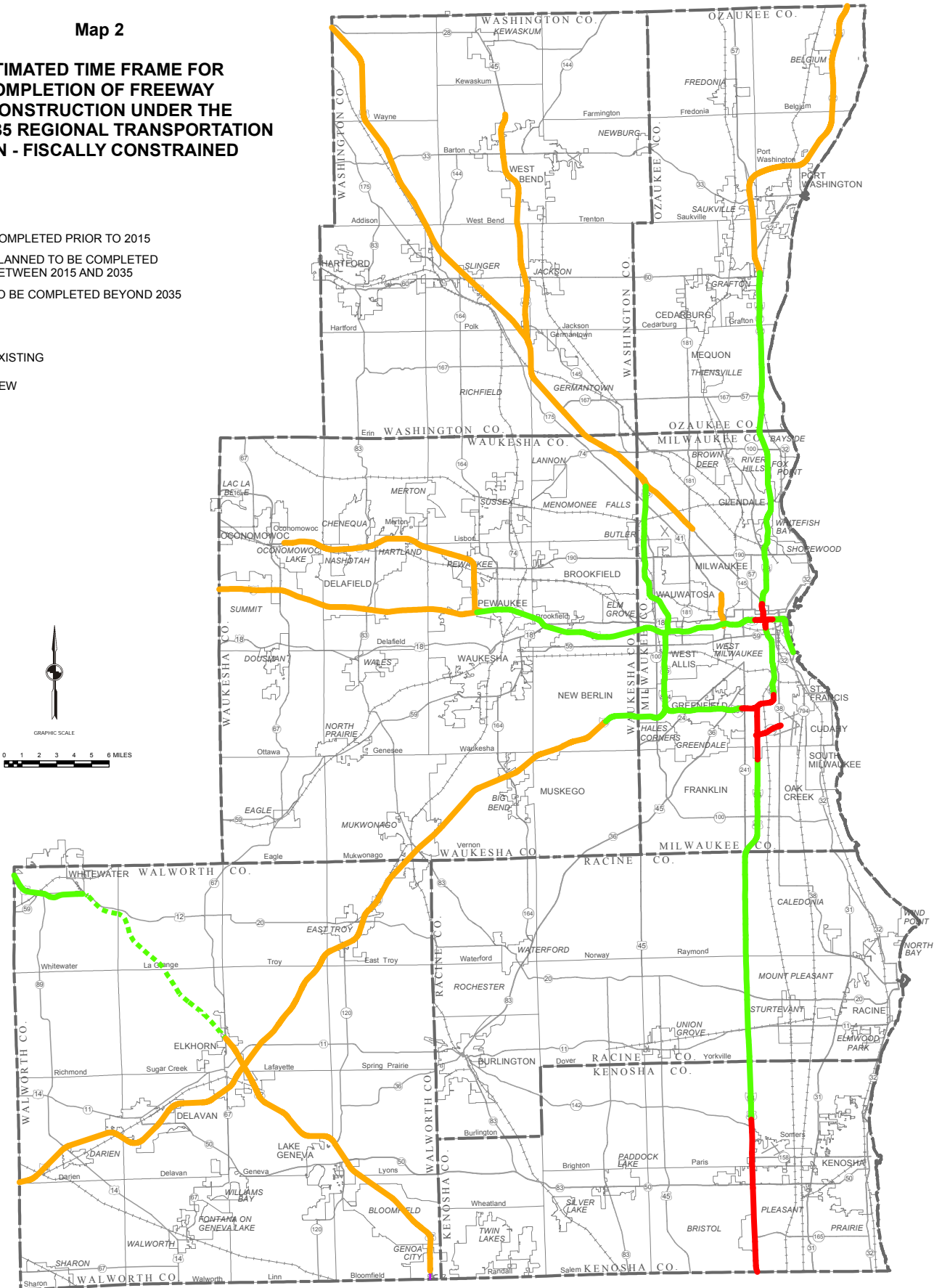
The expected funding gap between the estimated costs of the transit recommendations of the vision RTP and the existing and reasonably expected revenues available to implement the plan is expected to result in a lack of implementation of the improvement and expansion of public transit proposed in the Vision RTP, and as well

Map 2

**ESTIMATED TIME FRAME FOR COMPLETION OF FREEWAY RECONSTRUCTION UNDER THE YEAR 2035 REGIONAL TRANSPORTATION PLAN - FISCALLY CONSTRAINED**

**FREEWAY**

- COMPLETED PRIOR TO 2015
- PLANNED TO BE COMPLETED BETWEEN 2015 AND 2035
- TO BE COMPLETED BEYOND 2035
- EXISTING
- NEW







Source: Wisconsin Department of Transportation and SEWRPC

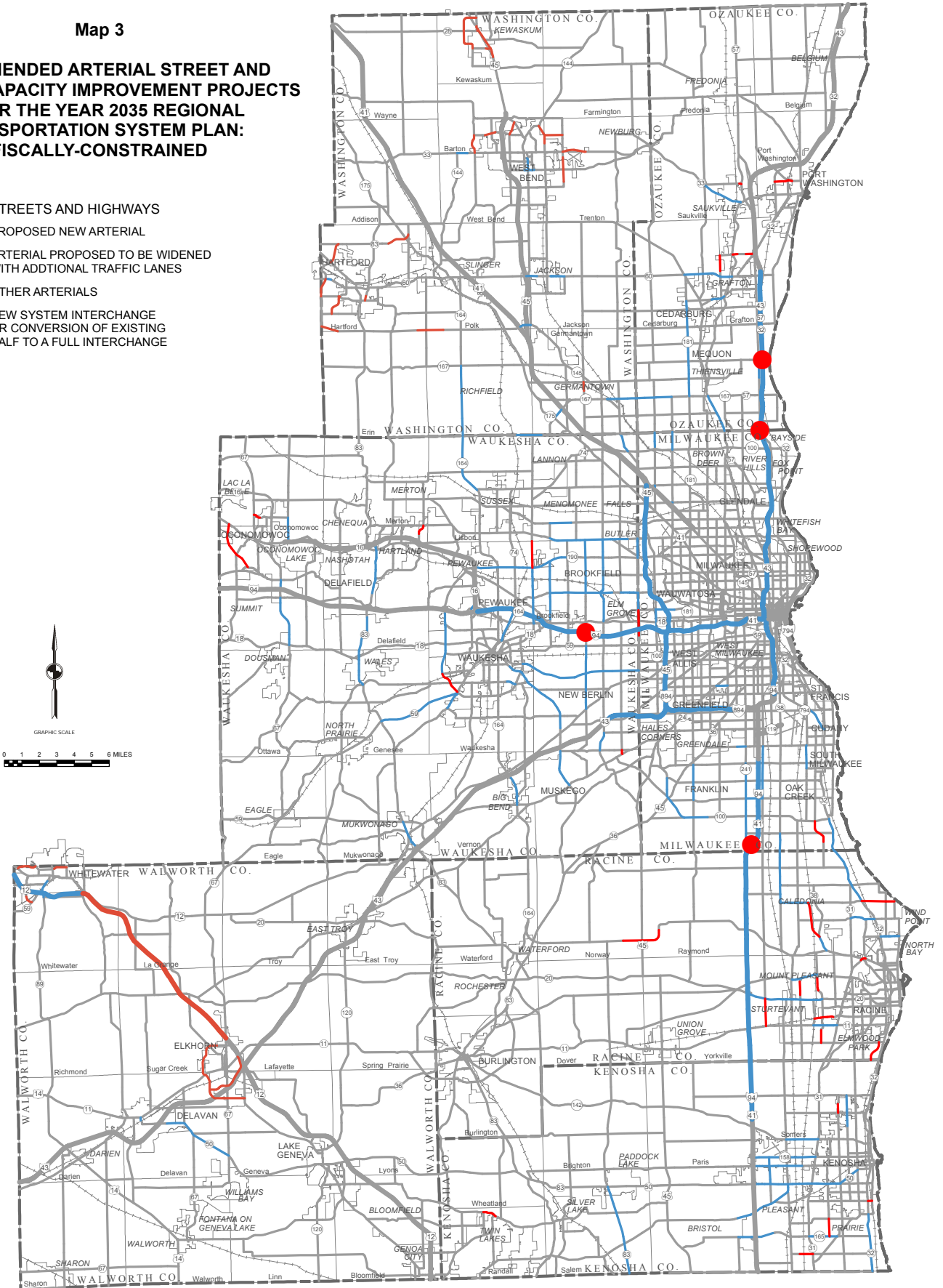
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Map 3

**RECOMMENDED ARTERIAL STREET AND  
HIGHWAY CAPACITY IMPROVEMENT PROJECTS  
UNDER THE YEAR 2035 REGIONAL  
TRANSPORTATION SYSTEM PLAN:  
FISCALLY-CONSTRAINED**

**ARTERIAL STREETS AND HIGHWAYS**

-  PROPOSED NEW ARTERIAL
-  ARTERIAL PROPOSED TO BE WIDENED WITH ADDITIONAL TRAFFIC LANES
-  OTHER ARTERIALS
-  NEW SYSTEM INTERCHANGE OR CONVERSION OF EXISTING HALF TO A FULL INTERCHANGE



Source: SEWRPC

Table 1

**ARTERIAL HIGHWAY CAPACITY IMPROVEMENT AND EXPANSION PROJECTS IN THE  
FISCALLY CONSTRAINED YEAR 2035 REGIONAL TRANSPORTATION SYSTEM PLAN**

Year Open to Traffic	County	Improvement Type	Facility	Termini	Description	
2015	Kenosha	Widening	CTH K (60th Street) <sup>a</sup> IH 94/USH 41 <sup>a</sup>	CTH H to Union Pacific Railway CTH C to STH 142	Widen from two to four traffic lanes Widen from six to eight traffic lanes	
	Milwaukee	Widening	CTH U (76th Street) <sup>a</sup> IH 94/IH 894/USH 41/STH 119 <sup>a</sup>  Pennsylvania Avenue <sup>a</sup> Watertown Plank Road <sup>a</sup> Watertown Plank Road <sup>a</sup>	Puetz Road to Imperial Drive Mitchell & Airport Interchanges  Rawson Avenue to College Avenue STH 100 to USH 45 USH 45 to 92nd Street	Widen from two to four traffic lanes Interchange reconstruction and modernization Widen from two to four traffic lanes Widen from four to six traffic lanes Widen from four to six traffic lanes	
	Ozaukee	Widening	STH 181 <sup>a</sup>	CTH T to Bridge Street	Widen from two to four traffic lanes	
	Waukesha	Widening	CTH L <sup>a</sup> CTH VV (Silver Spring Drive) <sup>a</sup>	CTH Y to CTH O CTH Y (Lannon Road) to Jackson Drive	Widen from two to four traffic lanes Widen from two to four traffic lanes	
	Kenosha	Expansion	51st Avenue extension CTH F extension	93rd Street to STH 165 CTH O to 89th Street	Construct two lanes on new alignment Construct two lanes on new alignment	
2020	Kenosha	Widening	CTH C CTH K CTH K CTH Q CTH S <sup>a</sup> IH 94/USH 41 <sup>a</sup> STH 158 (52nd Street) <sup>a</sup> STH 165 (104th Street)	CTH U to West Frontage Road IH 94 to 115th Street 104th Street to CTH H CTH U to IH 94 CTH H to STH 31 STH 142 to CTH KR STH 31 to 95th Avenue IH 94 to Prairie Springs Park	Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from six to eight traffic lanes Widen from two/four to six traffic lanes Widen from two to four traffic lanes	
		Expansion	15th Avenue extension Elm Road extension <sup>a</sup> IH 94/USH 41 <sup>a</sup>	STH 100 to Elm Road 27th Street to IH 94 Elm Road Interchange	Construct two lanes on new alignment Construct two lanes on new alignment Construct new interchange	
		Widening	IH 94 <sup>a</sup>  IH 94/IH 894/USH 45 <sup>a</sup>  107th Street 107th Street (CTH F)  124th Street 91st Street <sup>a</sup>  CTH V (13th Street) <sup>a</sup>  Morgan Avenue Pennsylvania Avenue Puetz Road  STH 241 (27th Street) <sup>a</sup> STH 241 (27th Street) STH 241 (27th Street)	Waukesha County Line to Zoo Interchange Zoo Interchange  Good Hope Road (CTH PP) to STH 145 Brown Deer Road (STH 100) to Ozaukee County Line Lisbon Avenue to Ruby Avenue Brown Deer Road (STH 100) to Ozaukee County Line Rawson Avenue (CTH BB) to Puetz Road Forest Home Avenue to 43rd Street Milwaukee Avenue to College Avenue STH 241 (27th Street) to CTH V (13th Street) College Avenue to Rawson Avenue Rawson Avenue to Drexel Avenue Racine County Line to Drexel Avenue	Widen from six to eight traffic lanes  Interchange reconstruction and modernization Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from four to six traffic lanes Widen from four to six traffic lanes Widen from four to six traffic lanes	
		Ozaukee	Widening	CTH W STH 57	Glen Oaks Lane to Highland Road Milwaukee County Line to STH 167	Widen from two to four traffic lanes Widen from two to four traffic lanes
		Racine	Expansion	21st Street extension CTH V extension Memorial Drive extension Oakes Road extension Oakes Road extension	Loni Lane to Willow Road STH 20 to STH 11 Chicory Road to CTH KR Braun Road to Oakes Road Oakes Road to Airline Road	Construct two lanes on new alignment Construct two lanes on new alignment Construct two lanes on new alignment Construct two lanes on new alignment Construct two lanes on new alignment
	Walworth	Widening	STH 11 <sup>a</sup> STH 32 <sup>a</sup>	Willow Road to STH 31 Five Mile Road to STH 31	Widen from four to six traffic lanes Widen from two to four traffic lanes	
		Expansion	W Market Street extension	CTH H to Voss Road	Construct two lanes on new alignment	
	Washington	Widening	STH 50	STH 11 to Washington Street	Widen from two to four traffic lanes	
		Expansion	18th Avenue extension	Jefferson Street to CTH D	Construct two lanes on new alignment	



**Table 1 (continued)**

Year Open to Traffic	County	Improvement Type	Facility	Termini	Description
2025	Ozaukee	Widening	STH 167	Washington County Line to Wauwatosa Road	Widen from two to four traffic lanes
			STH 181	STH 167 to CTH T	Widen from two to four traffic lanes
			STH 181	CTH C to CTH T	Widen from two to four traffic lanes
			STH 33	Progress Drive to CTH O	Widen from two to four traffic lanes
			STH 33	CTH I to Progress Drive	Widen from two to four traffic lanes
			STH 60	STH 181 to 12th Avenue	Widen from two to four traffic lanes
	Racine	Expansion	90th Street extension	STH 20 to CTH C	Construct two lanes on new alignment
		Widening	IH 94/USH 41 <sup>a</sup> IH 94/USH 41 <sup>a</sup> STH 20 STH 32	CTH K to CTH G CTH KR to CTH K IH 94/USH 41 to Oakes Road STH 31 to Milwaukee County Line	Widen from six to eight traffic lanes Widen from six to eight traffic lanes Widen from four to six traffic lanes Widen from two to four traffic lanes
	Walworth	Expansion	Indian Mound Parkway extension New Facility	Indian Mound Parkway to STH 59	Construct two lanes on new alignment
			W Market Street extension	STH 67 to STH 11 STH 11 to CTH H	Construct two lanes on new alignment Construct two lanes on new alignment
	Washington	Expansion	Trenton Road extension Wacker Drive extension Waterford Road extension	STH 33 to Maple Road Lee Road to Monroe Avenue Powder Hill Road to Pioneer Road	Construct two lanes on new alignment Construct two lanes on new alignment Construct two lanes on new alignment
		Widening	Decorah Road STH 60	7th Avenue to Indiana Avenue Independence Avenue to Existing four lane section	Widen from two to four traffic lanes Widen from two to four traffic lanes
Waukesha	Expansion	Oconomowoc Parkway	CTH BB (Concord Road) to Oconomowoc Parkway	Construct two lanes on new alignment	
		Sunnyslope Road extension	CTH HH to CTH L	Construct two lanes on new alignment	
	Widening	Calhoun Road CTH D (Cleveland Avenue)  CTH M (North Avenue) CTH M (North Avenue) <sup>a</sup> STH 83 STH 83	Cleveland Avenue to STH 59 Calhoun Road to Milwaukee County Line  Barker Road to Calhoun Road Calhoun Road to Pilgrim Road Mariner Drive to STH 16 Phylis Parkway to USH 18	Widen from two to four traffic lanes Widen from two to four traffic lanes  Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes	
2035	Kenosha	Expansion	85th Street extension	Sheridan Road to 7th Avenue	Construct two lanes on new alignment
			CTH ML extension	80th Avenue to STH 31	Construct two lanes on new alignment
		Widening	104th Avenue	STH 50 to STH 158	Widen from two to four traffic lanes
			CTH C Roosevelt Road STH 32 STH 165 STH 83	East Frontage Road to 104th Street 39th Avenue to 63rd Street 128th Street to 91st Street STH 31 to CTH ML 128th Street to STH 50	Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes
	Milwaukee	Widening	124th Street	North Avenue to Watertown Plank Road	Widen from two to four traffic lanes
			CTH ZZ (W College Avenue) IH 43	35th Street to 27th Street CTH O (Moorland Road) to Hale Interchange	Widen from two to four traffic lanes Widen from four to six traffic lanes
			IH 43	Marquette Interchange to Silver Spring Drive	Widen from six to eight traffic lanes
			IH 43/IH 894	Hale Interchange to STH 241 (27th Street)	Widen from six to eight traffic lanes
			IH 43/IH 894/USH 45	Hale Interchange	Interchange reconstruction and modernization
			IH 43/IH 94	Marquette Interchange	Interchange reconstruction and widening
Ozaukee	Expansion	Cedar Creek Road	CTH O to East Cedar Creek Road	Construct two lanes on new alignment	
		Cold Springs Road extension E. Cedar Creek Road	CTH O to CTH W East River Road to CTH W	Construct two lanes on new alignment Construct two lanes on new alignment	



**Table 1 (continued)**

Year Open to Traffic	County	Improvement Type	Facility	Termini	Description	
2035	Ozaukee	Expansion	Walters Street extension	CTH LL to Grant Street	Construct two lanes on new alignment	
	Racine	Expansion	CTH MM/Rapids Drive	Rivershore Drive to Rapids Court	Construct two lanes on new alignment	
			CTH K extension	Britton Road to 108th Street	Construct two lanes on new alignment	
	Racine	Expansion	Five Mile Road extension	North Point Drive to Erie Street	Construct two lanes on new alignment	
			Five Mile Road extension	Dublin Court to Sunshine Lane extended	Construct two lanes on new alignment	
	Racine	Expansion	STH 38 (Proposed Realignment)	Five Mile Road to Existing STH 38	Construct four lanes on new alignment	
			Widening	CTH C	CTH H to Airline Road	Widen from two to four traffic lanes
	CTH H	STH 38 to Five Mile Road		Widen from two to four traffic lanes		
	Five Mile Road	CTH H to Proposed STH 38		Widen from two to four traffic lanes		
	Four Mile Road	STH 31 to STH 32		Widen from two to four traffic lanes		
	W. Main Drive	Buena Park Road to Rivermoor Road		Widen from two to four traffic lanes		
	STH 38	Proposed STH 38 to CTH K		Widen from two to four traffic lanes		
	STH 38	Milwaukee County Line to CTH H		Widen from two to four traffic lanes		
	Walworth	Expansion	Three Mile Road	STH 32 to CTH G	Widen from two to four traffic lanes	
Deere Road extension			Deere Road to New Facility	Construct two lanes on new alignment		
E Market Street extension			STH 11 to STH 67	Construct two lanes on new alignment		
New East-West Arterial			Main Street to Tratt Street	Construct two lanes on new alignment		
New Facility			CTH H to STH 67	Construct two lanes on new alignment		
Starin Road Extension			Fremont Street to Newcomb Street	Construct two lanes on new alignment		
USH 12			CTH H to Illinois State Line	Construct four lanes on new alignment		
Walworth	Expansion	USH 12	CTH H Interchange	Construct new interchange		
		USH 12	CTH P Interchange	Construct new interchange		
		USH 12	STH 89 Interchange	Construct new interchange		
		USH 12	CTH A Interchange	Construct new interchange		
		USH 12	Howard Road to STH 67 Interchange	Construct four lanes on new alignment		
		USH 12	CTH S Interchange	Construct new interchange		
Walworth	Widening	STH 50 <sup>a</sup>	STH 67 Interchange	Construct new interchange		
		STH 59	Lake Lawn Lodge Entrance to CTH F (south)	Widen from two to four traffic lanes		
Walworth	Widening	STH 89	STH 89 to Whitewater Street	Widen from two to four traffic lanes		
		USH 12	Willis Ray Road to STH 59	Widen from two to four traffic lanes		
Washington	Expansion	USH 12	Cold Spring Road to Howard Road	Widen from two to four traffic lanes		
		CTH H extension	USH 45 to relocated USH 45	Construct two lanes on new alignment		
		Division Road extension	Main Street to Freistadt Road	Construct two lanes on new alignment		
		Jefferson Street extension	North River Road to Trenton Road	Construct two lanes on new alignment		
		Kettleview Road extension	STH 28 to USH 45	Construct two lanes on new alignment		
		Kettleview Road extension	CTH H to STH 28	Construct two lanes on new alignment		
		Kettleview Road extension	STH 33 to Schuster Drive	Construct two lanes on new alignment		
		Monroe Avenue extension	Monroe Avenue to Pond Road	Construct two lanes on new alignment		
		North River Road extension	North River Road to STH 144	Construct two lanes on new alignment		
		Schuster Drive extension	Schuster Drive to Beaver Dam Road	Construct two lanes on new alignment		
Washington	Expansion	STH 28 extension	USH 45 to relocated USH 45	Construct two lanes on new alignment		
		Taylor Road extension	Pond Road to STH 60	Construct two lanes on new alignment		
		USH 45 relocation	Sandy Ridge Road to STH 28	Construct two lanes on new alignment		
		Waterford Road realignment	Taylor Road to North Shore Drive	Construct two lanes on new alignment		
		Wilson Avenue extension	Monroe Avenue to Lincoln Avenue	Construct two lanes on new alignment		
		Washington	Widening	Main Street	Decorah Street to Walnut Street	Widen from two to four traffic lanes
				STH 33	STH 144 to Meadowlark Ct.	Widen from two to four traffic lanes
				STH 60	Ridgeway Drive to Maple Road	Widen from two to four traffic lanes
				STH 164	CTH Q to STH 167	Widen from two to four traffic lanes
				STH 167	STH 145 (Fond Du Lac Avenue) to Ozaukee County Line	Widen from two to four traffic lanes
Waukesha	Expansion	124th Street extension	Watertown Plank Road to 124th Street (STH 59)	Construct two lanes on new alignment		
		IH 94	Calhoun Road Interchange	Construct new interchange		
	Widening	Oconomowoc Parkway	STH 16 to CTH BB	Construct two lanes on new alignment		
		CTH D (Cleveland Avenue)	STH 59/164 to Calhoun Road	Widen from two to four traffic lanes		
Waukesha	Widening	CTH K (Lisbon Road)	CTH Y to Calhoun Road	Widen from two to four traffic lanes		
		CTH O (Moorland Road)	Calhoun Road to Hampton Road	Widen from two to four traffic lanes		
Waukesha	Widening	CTH K (Lisbon Road)	College Avenue to Grange Avenue	Widen from two to four traffic lanes		
		CTH O (Moorland Road)		Widen from two to four traffic lanes		

**Table 1 (continued)**

Year Open to Traffic	County	Improvement Type	Facility	Termini	Description
2035	Waukesha	Widening	CTH T Hampton Road IH 94 STH 59 STH 145 (Old Orchard Road)	Golf Road to CTH SS Lisbon Road to 132nd Street STH 16 to Milwaukee County Line STH 83 to St. Paul Avenue STH 100 (Main Street) to Washington/Waukesha County Line	Widen from two to four traffic lanes Widen from two to four traffic lanes Widen from six to eight traffic lanes Widen from two to four traffic lanes Widen from two to four traffic lanes

Source: SEWRPC

<sup>a</sup> Project included in 2013-2016 Transportation Improvement Program

<sup>b</sup> Project is not listed in 2013-2016 TIP. This project was previously included in the 2011-2014 Transportation Improvement Program. Work is currently underway. Additional funding obligations are expected beyond the last year of the 2013-2016 Transportation Improvement Program.

reductions in the current transit service and a potential increase in transit fares above the rate of inflation. There has been already a reduction in transit service levels from the 69,000 vehicle-miles of transit operating on average weekday in existing year 2005 (the base year of the adopted year 2035 regional transportation plan) to 61,000 vehicle-miles of transit operating in 2012, a reduction of about 11 percent. Based on the fiscally-constrained RTP, it would be expected that there would be about an 11 percent further reduction in transit service from 2012 service levels to 54,100 vehicle-miles of transit operating by the year 2035. Further, the fiscally-constrained transit element of the RTP assumed that transit fares would increase at about 3.5 percent annually, somewhat greater than the current rate of inflation of 2.5 percent experienced from 2006—the year the plan was adopted—to 2012. The reduction in transit service levels of about 11 percent from existing service levels would be expected to be achieved through reductions in service frequency. The only major project for transit included in the fiscally constrained RTP is the City of Milwaukee streetcar project. Map 4 shows the existing year 2012 routes and service areas for the public transit systems in Southeastern Wisconsin, which now represent the transit system in the Year 2035 Fiscally Constrained RTP.

The implementation schedule for the fiscally-constrained RTP identifies the elements of the transit plan which should be available for use as of the years 2015, 2020, 2025, and 2035. As shown in Figure 1 and Table 3, the year 2035 transit plan element implementation schedule anticipates that the anticipated 11 percent decrease in vehicle-miles of transit service over 2012 levels will continue from the year 2012 resulting in a decrease in service to about 59,000 vehicle-miles by 2015, 57,900 by 2020, 56,600 by 2025, and 54,100 by 2035. Also, under the fiscally-constrained RTP, transit fares would increase 1 percent annually, adjusted for inflation. In addition, the operations of the City of Milwaukee streetcar project are expected to begin by the year 2020.

### **Principal Differences between Year 2035 Regional Transportation Plan: Vision and Fiscally Constrained Plans**

These are three principal differences between Vision and Fiscally Constrained 2035 plans.







- Amount of freeway system reconstruction accomplished by year 2035
  - Vision Plan – 254 miles (including the widening of 114 miles of the existing freeway system in Southeastern Wisconsin).
  - Fiscally-Constrained Plan - 90 miles (including the widening of 87 miles of the existing freeway in Southeastern Wisconsin).

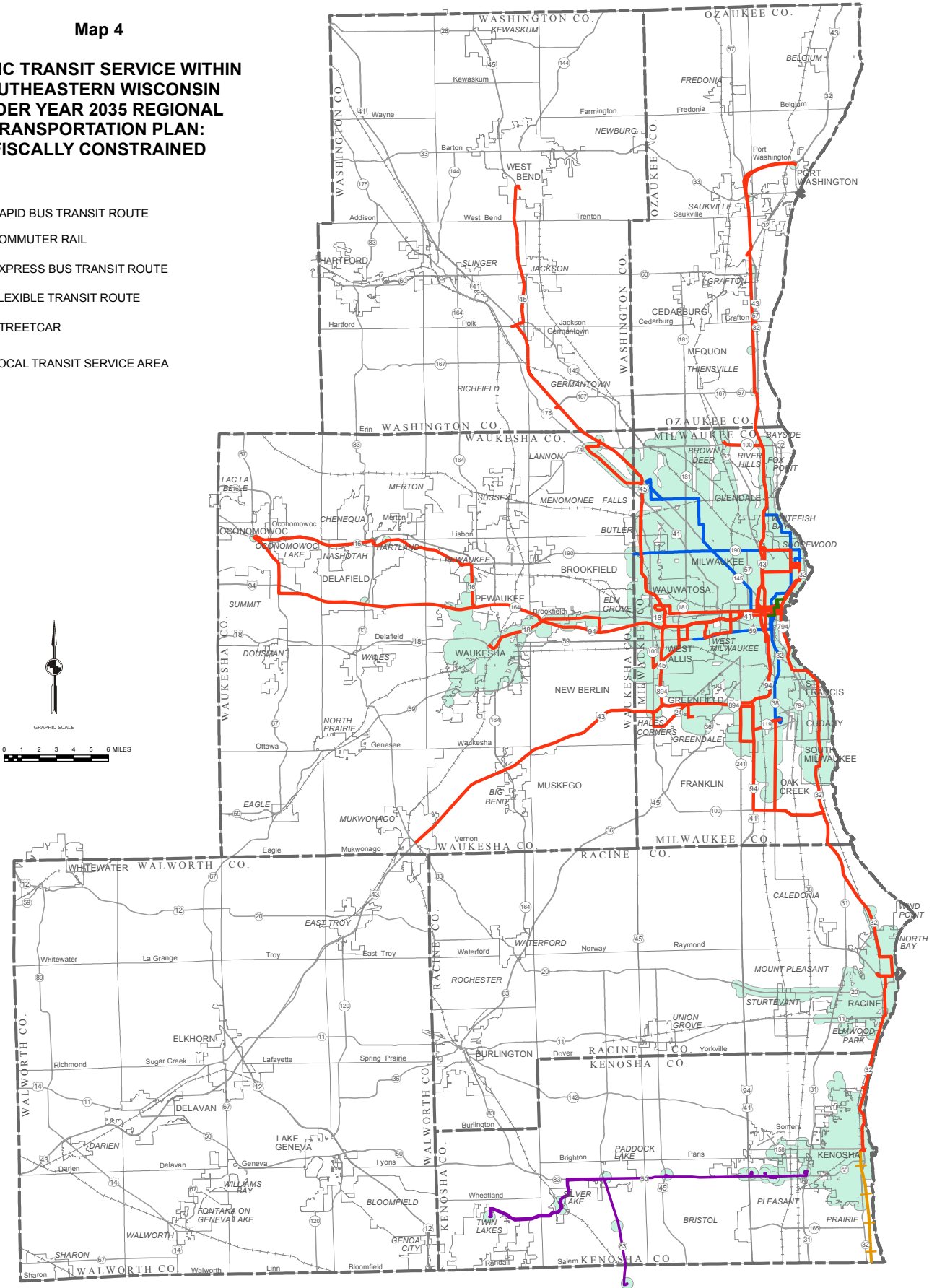
Under the Vision Plan, the entire freeway system would be reconstructed by 2035.

- Amount of surface arterials to be reconstructed with additional traffic lanes or newly constructed by the year 2035.
  - Vision Plan – 262 miles.
  - Fiscally-Constrained Plan – 256 miles.
- Public Transit Improvement and Expansion
  - Vision Plan – 76,300 additional weekday vehicle-miles of transit service representing a 125 percent expansion from year 2012 service levels.
  - Fiscally Constrained Plan – the reduction of 6,900 weekday vehicle-miles of service representing an 11 percent decline from 2012 service levels.

Map 4

**PUBLIC TRANSIT SERVICE WITHIN  
SOUTHEASTERN WISCONSIN  
UNDER YEAR 2035 REGIONAL  
TRANSPORTATION PLAN:  
FISCALLY CONSTRAINED**

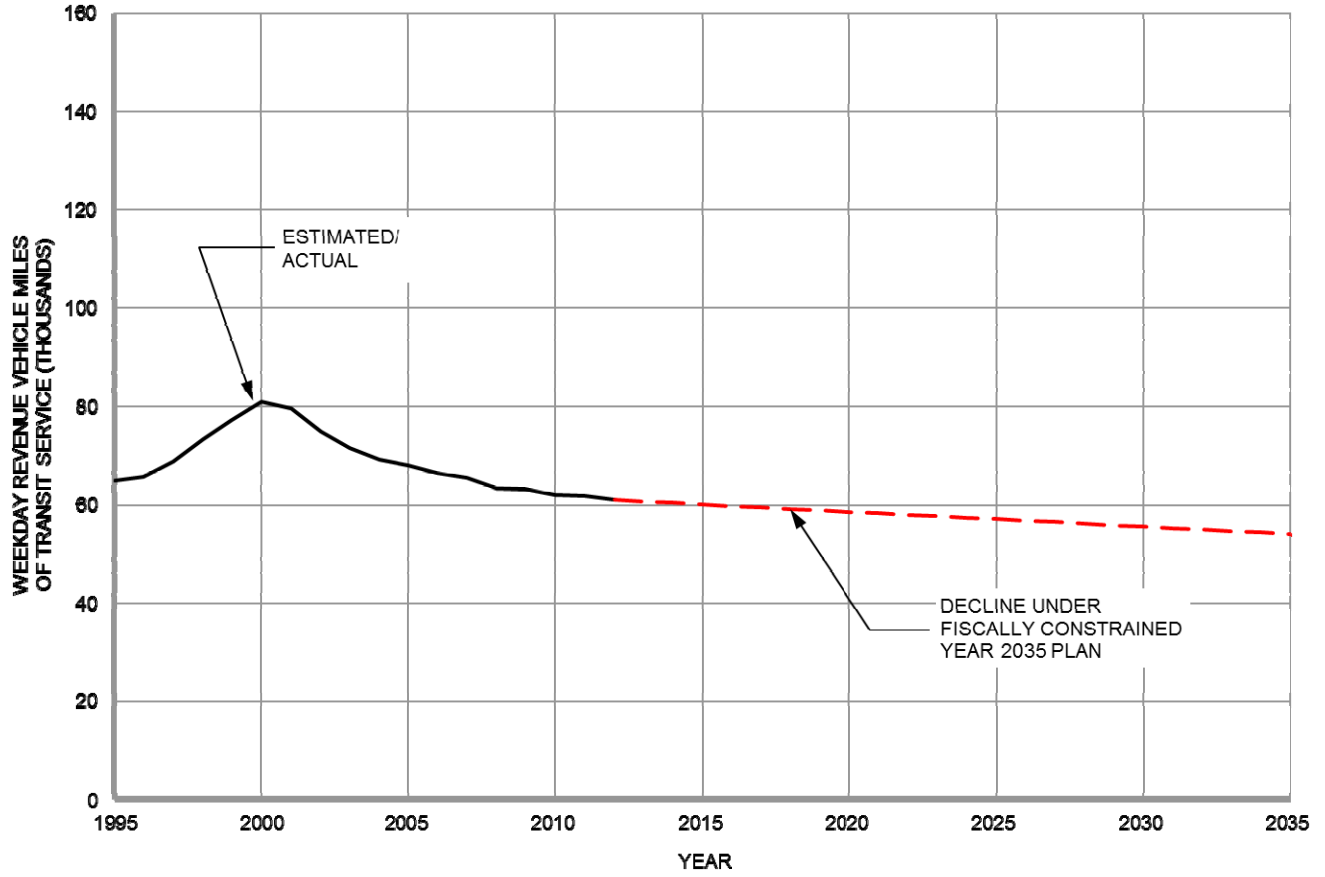
-  RAPID BUS TRANSIT ROUTE
-  COMMUTER RAIL
-  EXPRESS BUS TRANSIT ROUTE
-  FLEXIBLE TRANSIT ROUTE
-  STREETCAR
-  LOCAL TRANSIT SERVICE AREA



Source: SEWRPC

Figure 1

**HISTORIC AND PLANNED VEHICLE-MILES OF PUBLIC TRANSIT SERVICE  
ON AN AVERAGE WEEKDAY IN THE SOUTHEASTERN WISCONSIN REGION: 1995-2035**



Source: SEWRPC.

**Table 3**

**POTENTIAL STAGES OF THE FISCALLY-CONSTRAINED TRANSIT PLAN ELEMENT: 2015, 2020, 2025, AND 2035**

Year	Description
2015	Transit service reduced to approximately 59,000 vehicle miles of service on an average weekday, maintain transit service area. Average fares increase annually 1 percent over inflation.
2020	Transit service reduced to approximately 57,900 vehicle miles of service on an average weekday, maintain transit service area. Average fares increase annually 1 percent over inflation.  Initiate operation of Phase I of the City of Milwaukee Streetcar <sup>a</sup>
2025	Transit service reduced to approximately 56,600 vehicle miles of service on an average weekday, maintain transit service area. Average fares increase annually 1 percent over inflation.
2035	Transit service reduced to approximately 54,100 vehicle miles of service on an average weekday, maintain transit service area. Average fares increase annually 1 percent over inflation.

<sup>a</sup> Project included in the 2013-2016 Transportation Improvement Program

Source: SEWRPC.

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## **2013 THROUGH 2016 TRANSPORTATION IMPROVEMENT PROGRAM (TIP) FOR SOUTHEASTERN WISCONSIN**

The 2013-2016 TIP for Southeastern Wisconsin is documented in the SEWRPC report entitled, *A Transportation Improvement Program for Southeastern Wisconsin: 2013-2016*. The TIP includes all Federally and otherwise funded arterial highway and public transit projects programmed within the seven-county Southeastern Wisconsin Region for the years 2013 through 2016. A current listing of all projects included in the TIP can be found at the Commission's website ([www.sewrpc.org/TIP](http://www.sewrpc.org/TIP)).

The TIP includes projects for the entire seven-county Region both inside and outside the five urbanized areas within the Region—Milwaukee, Racine, Kenosha, the Wisconsin portion of the Round Lake Beach, and West Bend urbanized areas. The TIP also includes both arterial highway and public transit projects which receive Federal assistance and projects which are funded solely with State and/or local funds. The Commission's TIP has historically included both Federally funded and otherwise funded projects and has included projects for the entire Southeastern Wisconsin Region as well, not just the five urbanized areas within that Region. The TIP has included more than the Federally required listing of Federally assisted projects in the five urbanized areas in order to provide complete information on proposed arterial highway and public transit improvements. The continuation of the preparation of such a comprehensive TIP for Southeastern Wisconsin permits a comprehensive evaluation of transportation improvements with respect to air quality impacts.

Historically, the TIP for Southeastern Wisconsin has been structured to indicate the programmed projects in nine categories: highway system preservation, highway system improvement, highway system expansion, transit system preservation, transit system improvement, transit system expansion, highway safety, highway environmental enhancement, and off-system highway.<sup>5</sup>

The TIP has been developed to be fiscally constrained, pursuant to USDOT metropolitan planning regulations (23CFR Part 450) and USEPA conformity regulations (40 CFR Part 93.108). The funding attendant to implementing the TIP has been determined to be consistent with existing available Federal, State, and local funding levels.

### **ASSESSMENT OF CONFORMITY OF THE YEAR 2035 REGIONAL TRANSPORTATION PLAN AND THE 2013 THROUGH 2016 TRANSPORTATION IMPROVEMENT PROGRAM**

This section of the report demonstrates the conformity of the year 2035 fiscally-constrained RTP and the 2013-2016 TIP for Southeastern Wisconsin with respect to each of the conformity criteria, as well as with respect to the procedures to be used to demonstrate conformity as established by USEPA for such conformity assessment. This conformity demonstration is for the Wisconsin portion of the 2008 eight-hour marginal ozone nonattainment area consisting of Kenosha County east of IH 94 and for the three-county PM<sub>2.5</sub> maintenance area consisting of Milwaukee, Racine, and Waukesha Counties.

#### **Conformity Determination Procedural Requirements**

The procedures to determine conformity set forth in the *Federal Register* (40CFR Parts 51 and 93), as amended through March 14, 2012, are: 1) use of latest planning assumptions, 2) use of latest emission model, 3) interagency and public consultation, 4) provision for timely implementation of transportation control measures, 5) transportation plan content, and 6) procedures for determining RTP related emissions.

<sup>5</sup>All TIP projects with potential impact on air quality, that is, "nonexempt" projects, are listed later in this report in Table 7.

### ***Use of Latest Planning Assumptions***

This conformity determination procedural requirement (40 CFR, Part 93.110) specifies that the conformity assessment must be based upon the official and most current planning assumptions, including current and future population levels, employment levels, travel demand, traffic volumes, and transit ridership.

As previously noted, SEWRPC is the gubernatorially designated MPO for the Kenosha, Milwaukee, Racine, the Wisconsin portion of the Round Lake Beach, and West Bend urbanized areas within Southeastern Wisconsin and also the statutory official areawide planning agency for the seven-county Southeastern Wisconsin Region, which contains these five urbanized areas. The Commission is the agency within Southeastern Wisconsin responsible under State law for the preparation of current population, household, employment, travel, and traffic estimates and also for the preparation of future household, employment, travel, and traffic forecasts. The Commission also maintains the travel and traffic simulation models which are used within Southeastern Wisconsin for transportation and air quality planning. The models used in this conformity analysis are the same as used by the Commission in its regional planning efforts, and as well in support of air quality planning by WDNR.

The determination of conformity of the RTP and TIP requires specific travel and emission forecasts for the years 2015, 2020, 2025, and 2035. The population, household, and employment data at regional and subregional levels for the years 2015, 2020, and 2025 have been projected by interpolation between existing regional and subregional estimates and the year 2035 regional forecasts and subregional planned forecast allocations based upon the regional land use plan. The regional level year 2035 forecasts for population, households, and employment are set forth in Table 4, along with the interpolated years 2015, 2020, and 2025 population, household, and employment levels.

As part of regional transportation planning over the years, the implications of a range of different future development scenarios for Southeastern Wisconsin have historically been explored, including such scenarios with respect to VMT. The different scenarios included intermediate- and high-growth scenarios for the Region as a whole, centralized and decentralized land use patterns, and alternative regional transportation systems ranging from a "no-build" option, to an alternative which would substantially increase the price of automobile transportation, to the recommended system plan. The results of analyses of these scenarios indicated that the future annual growth in VMT within the Region may be expected to range from about 1.0 percent to 2.0 percent. The analyses indicated that alternative land use patterns and transit and highway improvements may be expected to have little impact on VMT, accounting for less than 0.1 percent variation in annual growth. Variations in regional economic growth and substantial changes in the perceived cost of automobile use may be expected to account each for about 0.5 percent variation in growth annually.

The determination of conformity utilizes the travel simulation models which have been maintained, refined, and validated by the Commission since the 1960s, and utilized in the preparation of the RTP and for the motor vehicle emissions forecasts for the State Implementation Plan. These models and their validation are described in Chapter VI, "Travel Simulation Models," of SEWRPC Planning Report No. 49, *A Regional Transportation Plan for Southeastern Wisconsin: 2035*. The Commission travel models were revalidated and recalibrated, using new data provided by a major origin and destination travel survey completed within the Region in 2001. The models were validated for the years 2000-2001 by applying the models with Census data and 2001 transportation network data and comparing model estimates of trip generation, trip distribution, highway traffic, and transit ridership to estimates derived from travel surveys and actual traffic and transit ridership counts. The validation indicated that the models were able to accurately replicate not only observed trip generation, travel pattern, modal choice, and VMT data, but also model-estimated individual arterial street traffic volume within 10 percent of the actual average weekday vehicular traffic. These models were validated again for the year 2008 by applying the models with year 2008 estimates of households, population, and employment and 2008 transportation network data and comparing estimates of arterial VMT and transit ridership to model estimates derived from actual traffic and transit ridership. This revalidation is documented in Appendix E of SEWRPC Memorandum Report 205, *Assessment of Conformity*



**Table 4**

**FORECAST POPULATION, HOUSEHOLD, AND EMPLOYMENT LEVELS  
FOR SOUTHEASTERN WISCONSIN: 2015, 2020, 2025, AND 2035**

Characteristics	Forecast Year			
	2015	2020	2025	2035
Southeastern Wisconsin				
Population	2,086,600	2,140,700	2,193,200	2,276,000
Households	837,700	865,000	889,500	925,800
Employment	1,284,400	1,308,300	1,323,100	1,368,100
Three County Area: Milwaukee, Racine, and Waukesha Counties				
Population	1,569,900	1,598,400	1,626,600	1,667,500
Households	636,800	652,400	665,900	685,600
Employment	1,012,200	1,026,200	1,036,400	1,069,100
East of I-94 in Kenosha County				
Population	130,700	136,200	141,700	151,700
Households	50,700	53,300	55,700	60,100
Employment	64,900	66,300	67,100	69,300

Source: SEWRPC.

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*of the Year 2035 Regional Transportation Plan and the Year 2013-2016 Transportation Improvement Program for the 1997 and 2008 Eight-Hour Ozone and 2006 24-Hour Fine Particulate National Ambient Air Quality Standards.*

Under this procedural requirement, changes in the transit system with respect to service levels and fares since the last plan and improvement program conformity determination are to be described. The last conformity determination was completed in December 2012 on the year 2035 RTP and the 2013-2016 TIP. That conformity determination was the sixth determination completed on the RTP for the year 2035, with the first conformity determination completed in June, 2006.

The vision RTP proposed that transit service levels measured in vehicle-miles of service double by the year 2035, with the increase in service levels beginning in 2007 and increasing approximately 2.5 percent annually to the year 2035. The plan also proposed that transit fare increases be held to general price inflation. Since 2005, the base year of the year 2035 plan, transit service levels have declined by approximately 11.4 percent. With respect to transit fares, the adult base fare on the Milwaukee County Transit System, which represents over 90 percent of the transit service provided in Southeastern Wisconsin, was \$1.75 in 2005, having last been increased in 2004. This adult base fare has been adjusted twice since 2005, an increase to \$2.00 in 2009, and an increase to \$2.25 in 2010, representing an increase of 29 percent. General price inflation is estimated to have experienced an increase of about 19 percent since 2005. The average fare per revenue passenger, which accounts for changes in the adult base fare and the price of passes and tickets, increased from \$0.81 in 2005 to \$1.11 in 2012, the last year revenue ridership and passenger revenue data are available, a 37 percent increase.

The conclusions reached in 2005, when the 2035 plan was initially adopted, and again in 2010 when that plan was first reviewed and updated, was that the plan recommendations were reasonably consistent with existing and reasonably expected to be available revenues. This conclusion is no longer possible given the elimination of motor fuel tax indexing and the failure of RTA legislation. As a result, in order to meet Federal regulations, the original year 2035 plan is now considered to be a “vision” plan, outlining the desirable transportation system improvements believed to be necessary to address the current and future transportation needs of the Region. In addition, it is necessary to identify a “fiscally constrained” year 2035 regional transportation plan which includes those elements of the 2035 plan which likely can be achieved within the restrictions of the amounts and limitations of existing and reasonably expected to be available revenues. With regard to transit, it would be expected that there would be about an 11 percent further reduction in transit service from 2012 service levels to 54,100 vehicle-miles of transit operating by the year 2035. Further, consistent with historical trends, the fiscally-constrained transit element assumed that transit fares would increase at about 3.5 percent annually, somewhat greater than the current rate of inflation of 2.5 percent experienced from 2006—the year the plan was adopted—to 2012. The reduction in transit service levels of about 11 percent from existing service levels would be expected to be achieved through reductions in service frequency.

The maintenance plan for the 2006 24-hour PM<sub>2.5</sub> NAAQS for the three-county area includes motor vehicle emissions budgets (MVEBs) considered adequate for the purposes of transportation conformity. These MVEBs were based on a high growth scenario from the Commission’s year 2035 plan with attendant growth in VMT of approximately 1.7 percent per year to the year 2010 to 2020, and 1.1 percent per year for 2020-2025 and 7.5 percent in additional emissions to account for uncertainty in transportation emission forecasts. This conformity is based upon the Commission official intermediate growth year 2035 forecasts with an attendant 0.9 percent annual increase in vehicles miles travel from the year 2001 to the year 2015, a 0.8 percent annual increase from 2015 to 2025, and a 0.6 percent annual increase from 2025 to 2035. The VMT forecasts in the maintenance plan and the fiscally-constrained RTP are consistent, with the maintenance plan forecasts being equal to, or greater than, the fiscally-constrained RTP forecasts. The higher rate of growth assumed in the maintenance plan provides latitude for potential VMT increases in a year or short-term period of years which may exceed long-term average increases, for example, during short-term periods of rapid economic growth and gasoline price decline. Lower

rates of increase in VMT are anticipated in the future due to anticipated slower growth in employment and labor force levels, stability in household size and slower growth in household levels, and modest increases in the fuel-related costs of operating a motor vehicle.

WisDOT has prepared an estimate of the actual growth in VMT for the years 2001 to 2010 in the Southeastern Wisconsin Region based upon traffic counts taken by the Department which represents the universe of Highway Performance Monitoring System (HPMS) data. Traffic counts are performed by the Department every three years in each County. Based upon these counts, the VMT in Southeastern Wisconsin is estimated to have increased by about 1.1 percent annually from 2001 to 2010, or slightly less than incorporated in the maintenance plan.<sup>6</sup>

### ***Use of Latest Emissions Model***

A second procedural requirement for the plan and program conformity determination (40 CFR 93.111) requires use of the latest air pollutant emissions estimation model. Accordingly, this determination of conformity utilizes the latest emission estimation model available, the USEPA MOVES2010b air pollutant emissions estimation model. The assumptions in the emissions estimation model for the years 2015, 2020, 2025, and 2035 in this conformity analysis, are presented in Table 5. This emissions estimation model is the latest version of the model (MOVES2010a) used by WDNR in its development of the transportation conformity budgets for VOC, NO<sub>x</sub>, SO<sub>2</sub>, and PM<sub>2.5</sub> included in the maintenance plan which served as the basis for USEPA's redesignation of the three-county southeastern Wisconsin 2006 24-hour PM<sub>2.5</sub> NAAQS nonattainment area to attainment on April 22, 2014. This conformity determination assumes implementation of, and credit for, Tier 2 motor vehicle standards and low sulfur gasoline regulations.

### ***Interagency and Public Consultation***

A third procedural requirement for plan and program conformity determination (40 CFR 93.112) relates to interagency and public consultation. The development of the RTP has involved interagency and public consultation, including, specifically, such consultations with respect to air quality impacts and the implications for conformity of the new plan and its alternatives. The 2013-2016 TIP directly implements the plan and is consistent with the plan schedule for implementation. In particular, WisDOT, WDNR, USDOT, and the county and local units of government have all been extensively involved in the development of the regional plans, including with respect to the consideration and evaluation of alternatives. These Federal, State, county, and local units and agencies of government have also been consulted, and have, as members of the Commission Advisory Committee guiding the preparation of the regional plan, reviewed and approved the travel simulation models utilized in the regional plan preparation and as well the level of detail of the RTP. It should be noted, with respect to the latter, that the fiscally-constrained RTP incorporates all existing local, express, and rapid transit facilities and services and includes the maintenance of the existing transit service areas. The plan also incorporates the entire arterial street and highway network of the Region, including all arterials in both urban and rural areas and major collectors in rural areas. The agencies concerned have also given consideration to the treatment in the travel simulation modeling and in the RTP of transportation control measures. In addition, there has been public consultation with respect to the RTP, including consultation on alternatives considered and evaluated. The consultation includes a series of public informational

<sup>6</sup> The traffic counts as taken by WisDOT are as follows: Kenosha County (8 percent of Region VMT in 2001), 1.67 percent annual growth from 2001 to 2008; Milwaukee County (43 percent of Region VMT in 2001) 1.05 percent annual reduction from 2001 to 2010; Ozaukee County (5 percent of Region VMT in 2001) 2.22 percent annual growth in VMT from 2001 to 2010; Racine County (9 percent of Region VMT in 2001) 0.46 percent annual growth in VMT from 2002 to 2008; Walworth County (6 percent of Region VMT in 2001) 1.53 percent annual growth in VMT from 2002 to 2008; Washington County (8 percent of Region VMT in 2001) 2.32 percent annual growth in VMT from 2001 to 2010; and Waukesha County (22 percent of Region VMT in 2001) 3.91 percent annual growth in VMT from 2000 to 2009. (See Appendix B.)

The Regional Planning Commission also prepared an estimate of the growth in vehicle-miles of travel within the Southeastern Wisconsin Region. The Commission used annual traffic counts available on the Region's freeway system, traffic counts on the surface arterial system which are available every three years, and special surface arterial counts conducted every year to factor the counts which are only available every three years. The Commission's estimate of the growth in vehicle-miles of travel from 2001 to 2008 was 1.2 percent annually, or about the same as the WisDOT estimate of 1.1 percent annually.

Table 5

**ASSUMPTIONS ASSOCIATED WITH MOVES2010b EMISSIONS  
ESTIMATING MODEL: 2011, 2015, 2025, AND 2035**

Wisconsin Portion of the Chicago-Naperville, IL-IN-WI Marginal Ozone Nonattainment Area				
Category	2011	2015	2025	2035
<b>Fuel Inputs</b>				
Gasoline Fuel				
Subtype.....	Gasohol (E10)	Gasohol (E10)	Gasohol (E10)	Gasohol (E10)
Ethanol Blends Market Share .....	100%	100%	100%	100%
Ethanol Volume .....	9.59%	9.59%	9.59%	9.59%
Reid Vapor Pressure (RVP).....	7.08 psi	7.08 psi	7.08 psi	7.08 psi
Sulfur Content.....	30 ppm	30 ppm	30 ppm	30 ppm
Aromatic Content.....	18.01%	18.01%	18.01%	18.01%
Olefin Content.....	5.16%	5.16%	5.16%	5.16%
Benzene Content.....	0.8%	0.7%	0.7%	0.7%
E200.....	48.6%	48.6%	48.6%	48.6%
E300.....	83.3%	83.3%	83.3%	83.3%
T50 (degrees Fahrenheit) .....	203.8	203.8	203.8	203.8
T90 (degrees Fahrenheit) .....	336.0	336.0	336.0	336.0
Diesel Fuel				
Subtype.....	Conv. Diesel	Conv. Diesel	Conv. Diesel	Conv. Diesel
Conventional Diesel Market Share .....	100%	100%	100%	100%
Sulfur Content.....	11 ppm	11 ppm	11 ppm	11 ppm
<b>Inspection/Maintenance Program Inputs</b>				
Fuel Type Tested .....	Gasoline	Gasoline	Gasoline	Gasoline
Inspection Frequency.....	Biennial	Biennial	Biennial	Biennial
Tests Conducted .....	Exh. and Evp. OBD	Exh. and Evp. OBD	Exh. and Evp. OBD	Exh. and Evp. OBD
Passenger Cars (All Model Years)				
Model Years Tested .....	1996 to 2008	1996 to 2012	1996 to 2022	1996 to 2032
Compliance Factor .....	95.04%	95.04%	95.04%	95.04%
Passenger Trucks (pre-2007 Model Years)				
Model Years Tested .....	1996 to 2006	1996 to 2006	1996 to 2006	1996 to 2006
Compliance Factor .....	89.34%	89.34%	89.34%	89.34%
Passenger Trucks (2007 and later Model Years)				
Model Years Tested .....	2007 to 2008	2007 to 2012	2007 to 2022	2007 to 2032
Compliance Factor .....	95.04%	95.04%	95.04%	95.04%
Light Commercial Trucks (pre-2007 Model Years)				
Model Years Tested .....	1996 to 2006	1996 to 2006	1996 to 2006	1996 to 2006
Compliance Factor .....	83.64%	83.64%	83.64%	83.64%
Light Commercial Trucks (2007 and later Model Years)				
Model Years Tested .....	2007 to 2008	2007 to 2012	2007 to 2022	2007 to 2032
Compliance Factor .....	93.14%	93.14%	93.14%	93.14%
<b>Other Inputs</b>				
<b>Meteorological Inputs</b>				
Range of Hourly Temperature (degrees Fahrenheit) .....	70.0 to 94.0	70.0 to 94.0	70.0 to 94.0	70.0 to 94.0
Range of Hourly Relative Humidity.....	55.9% to 85.8%	55.8% to 87.2%	55.8% to 87.2%	55.8% to 87.2%
Summer Weekday VMT .....	SEWRPC	SEWRPC	SEWRPC	SEWRPC
VMT by Hour of the Day.....	MOVES Default	MOVES Default	MOVES Default	MOVES Default
VMT by Vehicle Class .....	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR
Average Speed Distribution .....	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR
Vehicle Age Distribution				
Pass. Cars, Pass. Tks. and Light Commercial Tks. ....	WisDNR	WisDNR	WisDNR	WisDNR
All Other Vehicle Classes.....	MOVES Default	MOVES Default	MOVES Default	MOVES Default
Vehicle Population.....	M. Def./WisDNR	M. Def./WisDNR	M. Def./WisDNR	M. Def./WisDNR
Road Type Distribution.....	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR
Ramp Fraction.....	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR
Annual Mileage Accumulation .....	MOVES Default	MOVES Default	MOVES Default	MOVES Default

NOTE: The following abbreviations have been used in this table: MOVES (or MOVES2010b) = United States Environmental Protection Agency's Motor Vehicle Emissions Simulator model (version 2010b); E10 = fuel blend of approximately 90% gasoline and 10% ethanol; psi = pounds per square inch; ppm = parts per million; E200 = percent of fuel evaporated at 200 degrees Fahrenheit; E300 = percent of fuel evaporated at 300 degrees Fahrenheit; T50 = temperature (degrees Fahrenheit) at which 50% of the fuel is evaporated; T90 = temperature (degrees Fahrenheit) at which 90% of the fuel is evaporated; Conv. = Conventional; Exh. and Evp. OBD = Exhaust and Evaporative On-Board Diagnostic Check; VMT = Vehicle-Miles of Travel; SEWRPC = Southeastern Wisconsin Regional Planning Commission; WisDNR = Wisconsin Department of Natural Resources; Pass. = Passenger; Tks. = Trucks; and M. Def. = MOVES Default.

Table 5 (continued)

**ASSUMPTIONS ASSOCIATED WITH MOVES2010b EMISSIONS  
ESTIMATING MODEL: 2015, 2020, 2025, AND 2035**

Three-County Fine Particulate Nonattainment Area <sup>a</sup>				
Category	2015	2020	2025	2035
<b>Fuel Inputs</b>				
Gasoline Fuel				
Subtype.....	Gasohol (E10)	Gasohol (E10)	Gasohol (E10)	Gasohol (E10)
Ethanol Blends Market Share.....	100%	100%	100%	100%
Ethanol Volume.....	9.70%	9.70%	9.70%	9.70%
Reid Vapor Pressure (RVP).....	13.4 psi	13.4 psi	13.4 psi	13.4 psi
Sulfur Content.....	30 ppm	30 ppm	30 ppm	30 ppm
Aromatic Content.....	15.96%	15.96%	15.96%	15.96%
Olefin Content.....	5.49%	5.49%	5.49%	5.49%
Benzene Content.....	0.7%	0.7%	0.7%	0.7%
E200.....	59.5%	59.5%	59.5%	59.5%
E300.....	85.4%	85.4%	85.4%	85.4%
T50 (degrees Fahrenheit).....	158.7	158.7	158.7	158.7
T90 (degrees Fahrenheit).....	326.8	326.8	326.8	326.8
Diesel Fuel				
Subtype.....	Conv. Diesel	Conv. Diesel	Conv. Diesel	Conv. Diesel
Conventional Diesel Market Share.....	100%	100%	100%	100%
Sulfur Content.....	11 ppm	11 ppm	11 ppm	11 ppm
<b>Inspection/Maintenance Program Inputs</b>				
Fuel Type Tested.....	Gasoline Biennial	Gasoline Biennial	Gasoline Biennial	Gasoline Biennial
Inspection Frequency.....				
Tests Conducted.....	Exh. and Evp. OBD	Exh. and Evp. OBD	Exh. and Evp. OBD	Exh. and Evp. OBD
Passenger Cars (All Model Years)				
Model Years Tested.....	1996 to 2012	1996 to 2017	1996 to 2022	1996 to 2032
Compliance Factor.....	95.04%	95.04%	95.04%	95.04%
Passenger Trucks (pre-2007 Model Years)				
Model Years Tested.....	1996 to 2006	1996 to 2006	1996 to 2006	1996 to 2006
Compliance Factor.....	89.34%	89.34%	89.34%	89.34%
Passenger Trucks (2007 and later Model Years)				
Model Years Tested.....	2007 to 2012	2007 to 2017	2007 to 2022	2007 to 2032
Compliance Factor.....	95.04%	95.04%	95.04%	95.04%
Light Commercial Trucks (pre-2007 Model Years)				
Model Years Tested.....	1996 to 2006	1996 to 2006	1996 to 2006	1996 to 2006
Compliance Factor.....	83.64%	83.64%	83.64%	83.64%
Light Commercial Trucks (2007 and later Model Years)				
Model Years Tested.....	2007 to 2012	2007 to 2017	2007 to 2022	2007 to 2032
Compliance Factor.....	93.14%	93.14%	93.14%	93.14%
<b>Other Inputs</b>				
Meteorological Inputs				
Range of Hourly Temperature (degrees Fahrenheit).....	10.6 to 27.7	10.6 to 27.7	10.6 to 27.7	10.6 to 27.7
Range of Hourly Relative Humidity.....	67.5% to 78.1%	67.5% to 78.1%	67.5% to 78.1%	67.5% to 78.1%
January Weekday VMT.....	SEWRPC	SEWRPC	SEWRPC	SEWRPC
VMT by Hour of the Day.....	MOVES Default	MOVES Default	MOVES Default	MOVES Default
VMT by Vehicle Class.....	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR
Average Speed Distribution.....	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR
Vehicle Age Distribution				
Pass. Cars, Pass. Tks. and Light Commercial Tks. ....	WisDNR	WisDNR	WisDNR	WisDNR
All Other Vehicle Classes.....	MOVES Default	MOVES Default	MOVES Default	MOVES Default
Vehicle Population.....	M. Def./WisDNR	M. Def./WisDNR	M. Def./WisDNR	M. Def./WisDNR
Road Type Distribution.....	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR
Ramp Fraction.....	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR	SEWRPC/WisDNR
Annual Mileage Accumulation.....	MOVES Default	MOVES Default	MOVES Default	MOVES Default

NOTE: The following abbreviations have been used in this table: MOVES (or MOVES2010b) = United States Environmental Protection Agency's Motor Vehicle Emissions Simulator model (version 2010b); E10 = fuel blend of approximately 90% gasoline and 10% ethanol; psi = pounds per square inch; ppm = parts per million; E200 = percent of fuel evaporated at 200 degrees Fahrenheit; E300 = percent of fuel evaporated at 300 degrees Fahrenheit; T50 = temperature (degrees Fahrenheit) at which 50% of the fuel is evaporated; T90 = temperature (degrees Fahrenheit) at which 90% of the fuel is evaporated; Conv. = Conventional; Exh. and Evp. OBD = Exhaust and Evaporative On-Board Diagnostic Check; VMT = Vehicle-Miles of Travel; SEWRPC = Southeastern Wisconsin Regional Planning Commission; WisDNR = Wisconsin Department of Natural Resources; Pass. = Passenger; Tks. = Trucks; and M. Def. = MOVES Default.

<sup>a</sup>Milwaukee, Racine, and Waukesha Counties.

Source: Wisconsin Department of Natural Resources and SEWRPC.

meetings and hearings, transmittal of a series of newsletters to over 2,500 individuals, extensive outreach activities, and a website including all study and plan materials. The public consultation on the year 2035 RTP is documented in a series of reports which document the comments received on the plan and its social, economic, and environmental impacts, and the consideration and response to the public comment. The public consultation on the 2014 quadrennial review and update of the year 2035 RTP includes the transmittal of a newsletter to approximately 2000 individuals, and a public meeting and hearing. Comments received and the consideration and response are documented in Chapter 6 of SEWRPC Memorandum, *The Review, Update, and Reaffirmation of the Year 2035 Regional Transportation Plan*.

State and county and municipal governments have also been directly involved in the preparation of the 2013-2016 TIP through their submittal of projects for inclusion in the TIP and their consideration and approval of the TIP.

#### ***Provision for Timely Implementation of Transportation Control Measures***

A fourth procedural requirement for plan and program conformity determination, (40 CFR Part 93.113) is that the RTP and TIP must provide for timely implementation of all transportation control measures in the maintenance plan for air quality for the three-county nonattainment area for the 2006 24-hour PM<sub>2.5</sub> NAAQS, and that the transportation plan or program may not interfere with the implementation of any transportation control measure in the State Implementation Plan. There are no transportation control measures in the maintenance plans. The State plan submitted in November 1993 by WDNR did include implementation of the Federally mandated Employee Commute Options program. The Employee Commute Options Mandate was eliminated on December 23, 1995, and affected ozone nonattainment areas were allowed to substitute other emission reduction efforts for the reductions expected from the Employee Commute Options program. WDNR formally withdrew its Employee Commute Options program State Implementation Plan in May 1996 (after USEPA approval of the Wisconsin 15 percent State Implementation Plan in March 1996). WDNR indicated that it would be substituting the Wisconsin Partners for Clean Air program for the Employee Commute Options program. The Partners program requests that large employers and other interested parties continue with any previously mandated Employee Commute Options related trip reduction activities, sign a pledge to promote trip reduction and transit promotion activities, promote Ozone Action Day efforts, or make point and area source emission reductions beyond current Federal and State requirements. The RTP and TIP would in no way interfere with the implementation of the Partners program and would assist in its implementation. The RTP recommends a number of measures which should serve to assist in the implementation of the trip reduction goals that are a key component of the Partners program. The 2013-2016 TIP includes a number of measures which should serve to significantly assist in the implementation of the Partners program, including the provision of transit service as an option for commuters.

#### ***Transportation Plan Content***

A fifth procedural requirement for plan and program conformity determination is the content, or level of detail, of the transportation plan. The fiscally-constrained RTP and the travel simulation modeling analysis of attendant plan emissions fully meet the requirements of transportation plan content (40 CFR 93.106). The fiscally constrained plan includes all additions to the transportation system with respect to both highway and public transit which can be expected to be completed by the year 2035 based on existing and reasonably expected revenues.

All additions of arterial street system highway capacity which can be expected to be completed by the year 2035 based on existing and reasonably expected revenues, including widening of arterial streets to provide additional traffic lanes and construction of new arterial facilities, are included in the fiscally constrained RTP. This arterial street system includes approximately 3,600 miles of streets within the seven-county Southeastern Wisconsin Region, or about one-third of the total street system, and includes all state, county, and municipal arterials within urban areas and all arterials and major collectors within rural areas of the Region. The plan also includes the total existing transit system, including the existing local, express, and rapid transit system components, includes an expected 11 percent

reduction in 2012 service levels and maintenance of the geographic coverage of the existing transit systems, and the planned construction and operation of Phase I of the City of Milwaukee streetcar.

The travel simulation modeling conducted under this conformity analysis is fully consistent with, indeed identical to, the travel simulation modeling conducted by the Commission for the preparation of the RTP and for the preparation of the maintenance plan. The travel simulation modeling for the conformity determination is sensitive to the added capacity and service provided by each highway and transit plan proposal, accurately reflecting its potential effect through changes in travel time and attendant route choice, mode choice, travel patterns, and trip generation. The RTP and its treatment in the travel simulation modeling analysis goes beyond the Federally required consideration of Federally defined regionally significant projects, that is, principal arterials and transit fixed guideways, in that it includes all arterial and public transit facilities. Also, the vision RTP is consistent with the adopted regional land use plan since it was designed to serve and promote implementation of the land use plan. The consistency between the transportation system and land use plans was tested by comparing both the accessibility provided under the transportation plan, and the incremental accessibility provided by the vision RTP relative to a "no-build" plan, to the land use plan. As the projects included in the fiscally-constrained RTP come out of the vision RTP, the accessibility provided by the fiscally-constrained RTP should also serve and promote implementation of the land use plan.

#### ***Transportation Emissions and Travel Modeling Procedures***

The procedures for estimating the RTP and program emissions also fully meet the emission and travel modeling requirements, (40 CFR 93.122).<sup>7</sup> Specifically, the travel simulation modeling analysis for this conformity determination incorporates in the analysis all planned highway capacity improvements and expansion, for all arterial facilities, including major collectors in rural areas, and for all transit improvements and expansion included in the fiscally-constrained RTP. The travel simulation modeling analysis does not assume emission reductions for any transportation control measures or control programs external to the transportation system, as, for example, changes in motor fuel volatility or vehicle inspection and maintenance programs, except with respect to such programs incorporated in the maintenance plan.

The Federal requirements for determination of conformity after January 1, 1997, (40 CFR 93.122(d)), have been met under this conformity determination. The travel and traffic simulation models used to estimate the transportation plan and improvement program air pollutant emissions are network-based models which forecast travel demand and traffic volume based upon economic and demographic forecasts, planned land use allocation patterns, and the characteristics of the transportation system. As already noted, the travel models are fully described in Chapter VI, "Travel Simulation Models," of SEWRPC Planning Report No. 49, *A Regional Transportation Plan for Southeastern Wisconsin: 2035*. The models were calibrated with year 2001 large-scale travel survey data and represent state-of-the-art professional practice approved by the Commission Advisory Committee on Regional Transportation System Planning, which Committee includes representation from Federal, State, and local governments.

The models were validated for the years 2000-2001 using 2000 census data and land use inventory data, and 2001 travel survey data and transportation system inventory data with respect to simulation of both transit ridership and arterial street and highway traffic by comparing model estimates to actual counts. The models were revalidated for the year 2008 by applying the models with year 2008 estimates of households, population, and employment and year 2008 transportation network data and comparing estimates of arterial VMT and transit ridership to estimates derived from actual traffic and transit ridership. This revalidation is documented in Appendix E of SEWRPC Memorandum

<sup>6</sup>A U.S. Department of Transportation, Federal Highway Administration report issued May 21, 1997, on the Federal Review of the travel modeling conducted by the Commission, is documented in Appendix E of SEWRPC Memorandum Report No. 147, entitled, *Assessment of Conformity of the Amended Year 2000-2002 Transportation Improvement Program and Amended Year 2020 Regional Transportation Plan With Respect to the State of Wisconsin Air Quality Implementation Plan—Six-County Severe Ozone Nonattainment Area and Walworth County Ozone Maintenance Area, along with a Commission report which cites how each requirement in 40CFR 93.122 is met.*

Report 205, *Assessment of Conformity of the Year 2035 Regional Transportation Plan and the Year 2013-2016 Transportation Improvement Program for the 1997 and 2008 Eight-Hour Ozone and 2006 24-Hour Fine Particulate National Ambient Air Quality Standards.*

The future travel and traffic forecasts from the models have been compared to historic trends. The population, employment, land use, and other assumptions attendant to the travel and traffic forecast are documented in Chapter 3 of SEWRPC Memorandum Report 215, *Review and Update of the Year 2035 Regional Transportation Plan.*

The conclusion of this review is that the forecasts attendant to the year 2035 RTP including population, households, employment, and other assumptions continue to remain valid for long-range transportation planning.

The models incorporate sensitivity to peak-hour traffic congestion and travel time through a capacity restrained traffic assignment. A peak hour traffic assignment with forecast peak hour traffic volumes and speeds is prepared. The peak hour volumes and speeds are sensitive to the total travel volume on the facility and the potential for the spreading of peak hour traffic to adjacent hours of the day. The models incorporate the peak-hour congestion and travel times as determined in traffic assignment in the trip distribution model to determine travel patterns and mode choice model to determine transit ridership.

The models incorporate an iteration, or feedback, of model steps so that the travel times used to determine travel patterns, transit ridership, and route choice are consistent with the travel times established in capacity restraint traffic assignment.

The constrained peak hour, and the free flow, or off-peak, travel speeds incorporated in the models are based upon actual field surveyed speeds and travel times. The last such survey was completed in 2000. The models estimate peak and off-peak travel times and utilize peak-travel times in trip distribution and modal choice of peak travel (work and school travel). Off-peak travel times are used in trip distribution and mode choice for off-peak travel (shopping and other travel).

The model steps of trip distribution and mode choice are directly sensitive to the price of travel, as well as travel time, including public transit travel time.

The consistency of the vision RTP and the underlying land use plan is directly established, tested, and documented<sup>8</sup>. First, the transportation plan is designed to serve the regional land use plan, which is an agreed upon desirable pattern of future land use and not a projected pattern of likely future land use. The transportation plan only includes highway and transit improvements which address existing needs and travel demands and those future needs and travel demands which are generated by the regional land use plan. Second, to test this consistency of the regional land use and transportation plans, all transportation improvements are mapped and compared to areas of existing and planned development under the land use plan, and areas which are to be protected under the plan from development. Third, an additional test of the consistency of the regional land use and transportation plans was the preparation of forecasts of the accessibility provided by the transportation plan to each subarea of the region, as defined by traffic analysis zones. The total level of accessibility provided by the transportation plan, and, as well, the incremental level of accessibility compared to a "no-build" transportation plan was compared to areas of existing and planned development under the regional land use plan, and areas under the plan which are to be protected from development. The fiscally-constrained RTP is consistent with the land use plan in the projects included in the fiscally-constrained RTP come from the vision RTP. Thus the accessibility provided by the projects included in the fiscally-constrained RTP should also serve and promote implementation of the land use plan.

<sup>8</sup> *Consistency of the RTP and land use plans are documented in Chapter VIII, Regional Transportation Plan Development and Evaluation, of SEWRPC Planning Report Number 49, A Regional Transportation Plan for Southeastern Wisconsin: 2035*



The VMT estimated by the models in the base year of its validation (2008) have been compared to estimates prepared with the Highway Performance Monitoring System (HPMS), and it has been determined that the 2008 model estimate is consistent with the 2008 inventory estimate. In addition, the Commission has maintained for over 20 years procedures to estimate off-network roadway travel. The procedures have been periodically reevaluated and validated. Such procedures were developed as part of the first Statewide implementation plan for air quality, prepared by the Regional Planning Commission in 1978, and provide estimates for use in RTP and State Implementation Plan preparation and conformity determination. The method is based on analyses which estimate off-network travel by calculating total intrazonal travel and trip lengths, based upon zone size and development distribution. The analyses indicate off-network travel represents about 9 percent of total travel. This is consistent with independent highway performance monitoring system estimates. Off-network travel is estimated for each alternative by factoring network travel forecasts by approximately 10 percent.

Also, for use in capacity restrained traffic assignment, as well as in trip distribution and mode choice, the simulation model estimates traffic speeds sensitive to the forecast traffic volume on each roadway segment for both peak-hour and average 24-hour conditions, the latter based upon the proportion of traffic traveling under peak-hour and congested conditions and the proportion of traffic traveling under off-peak conditions. The estimated congested traffic speeds are calculated on the basis of a model calibrated using inventoried speeds and congestion which relates reductions in speed to the ratio of traffic volume to design capacity. The model was validated through comparison of model-estimated speeds to actual arterial street and highway segment operating speeds.

### **Conformity Determination Criteria--Consistency with Motor Vehicle Emissions Budget and Interim Emissions Tests**

The test of RTP and TIP conformity requires that the transportation system emissions forecasts under the fiscally-constrained RTP and TIP must be consistent with, that is, equal to, or less than, the transportation systems emissions budget, or "motor vehicle emissions budget," in the maintenance plan for the three-county maintenance area for the 2006 24-hour PM<sub>2.5</sub> NAAQS.

With respect to the three-county area, the maintenance plan for the 2006 24-hour PM<sub>2.5</sub> NAAQS for this conformity analysis is the attainment demonstration submitted to USEPA in June 2012 with VOC, NO<sub>x</sub>, PM<sub>2.5</sub>, and SO<sub>2</sub> emission budgets for 2020 and 2025. This will fulfill the requirement to determine conformity of the RTP and TIP within two years of a maintenance plan approval by USEPA. The maintenance plan was approved and the three-county area redesignated to attainment on April 22, 2014.

With regard to the Wisconsin portion of the Chicago-Naperville, IL-IN-WI marginal nonattainment area, the test for RTP and TIP conformity is that forecast year emission estimates must be less than the baseline year 2011 emissions estimated for VOC and NO<sub>x</sub>. The estimate of year 2011 emissions is based on traffic count data published annually by WisDOT.

The transportation system emissions attendant to the fiscally-constrained RTP and 2013-2016 TIP through the year 2035 were forecast through application of the Commission travel and traffic simulation models under the year 2035 population, households, and employment forecasts and regional land use plan. Table 6 presents the forecast VMT attendant to the forecast years of 2015, 2020, 2025, and 2035. The transportation plan projects incorporated in each forecast year were listed in Tables 3 (transit) and 1 (arterial street and highway).

The year 2013-2016 TIP is consistent with the year 2035 RTP and the plan's implementation schedule. All TIP projects, that is, projects with air quality impacts, are included in the plan. Also, the TIP includes all projects essential to implement the plan on schedule. The satisfaction of these two tests is demonstrated in Tables 1, 3, and 7.

Table 6

AVERAGE WEEKDAY VEHICLE MILES OF TRAVEL WITHIN SOUTHEASTERN WISCONSIN: FORECAST YEAR 2015, 2020, 2025 and 2035<sup>a</sup>

Facility Type	Speed Range	2015	2020	2025	2035
Standard Arterials Three-County Area	0 to 2.5	--	--	--	--
	2.5 to 7.5	169	170	100	--
	7.5 to 12.5	31,819	33,095	33,790	35,753
	12.5 to 17.5	471,887	484,198	501,392	514,714
	17.5 to 22.5	2,438,676	2,486,734	2,552,729	2,537,628
	22.5 to 27.5	3,506,259	3,582,187	3,650,340	3,665,842
	27.5 to 32.5	3,602,866	3,666,826	3,761,360	3,786,563
	32.5 to 37.5	2,960,323	3,121,191	3,198,596	3,269,182
	37.5 to 42.5	2,929,792	3,140,064	3,231,573	3,396,188
	42.5 to 47.5	724,956	752,418	794,384	844,333
	47.5 to 52.5	2,635,778	2,827,212	2,885,919	3,085,109
	52.5 to 57.5	--	--	--	--
	57.5 to 62.5	--	--	--	--
	62.5 to 67.5	--	--	--	--
	67.5 to 72.5	--	--	--	--
72.5+	--	--	--	--	
Subtotal	--	19,302,356	20,093,925	20,610,083	21,135,312
Freeways Three-County Area	0 to 2.5	--	--	--	--
	2.5 to 7.5	13,175	9,839	14,844	8,379
	7.5 to 12.5	9,032	9,040	6,318	5,600
	12.5 to 17.5	68,728	78,267	56,212	55,775
	17.5 to 22.5	397,364	364,154	354,116	337,281
	22.5 to 27.5	391,094	402,996	444,864	344,239
	27.5 to 32.5	291,225	333,302	271,601	388,667
	32.5 to 37.5	362,498	387,976	424,851	425,365
	37.5 to 42.5	407,816	411,540	398,342	429,692
	42.5 to 47.5	648,942	685,739	670,033	766,188
	47.5 to 52.5	1,808,865	1,777,276	1,923,290	1,992,838
	52.5 to 57.5	2,870,001	3,429,070	3,373,489	4,143,684
	57.5 to 62.5	1,241,184	1,248,326	1,305,832	1,425,648
	62.5 to 67.5	3,899,040	3,863,595	4,336,203	4,649,256
	67.5 to 72.5	--	--	--	--
72.5+	--	--	--	--	
Subtotal	--	12,395,789	12,991,281	13,565,151	14,964,233
Three-County Area Total		31,698,145	33,085,206	34,175,234	36,099,545

Table 6 (continued)

AVERAGE WEEKDAY VEHICLE MILES OF TRAVEL WITHIN SOUTHEASTERN WISCONSIN: FORECAST YEAR 2015, 2020, 2025 and 2035<sup>a</sup>

Facility Type	Speed Range	2015	2020	2025	2035
Standard Arterials Kenosha County (Part) Area	0 to 2.5	--	--	--	--
	2.5 to 7.5	--	--	--	--
	7.5 to 12.5	9	22	10	49
	12.5 to 17.5	7,369	7,878	7,940	9,456
	17.5 to 22.5	79,495	82,040	78,914	83,527
	22.5 to 27.5	184,065	189,808	189,184	202,132
	27.5 to 32.5	233,742	243,371	260,664	269,853
	32.5 to 37.5	238,917	251,793	272,315	318,871
	37.5 to 42.5	579,270	618,653	649,887	717,313
	42.5 to 47.5	187,245	201,146	227,223	235,909
	47.5 to 52.5	230,882	257,293	265,302	291,429
	52.5 to 57.5	--	--	--	--
	57.5 to 62.5	--	--	--	--
	62.5 to 67.5	--	--	--	--
	67.5 to 72.5	--	--	--	--
72.5+	--	--	--	--	
Subtotal	--	1,740,994	1,852,004	1,951,439	2,128,539
Freeways Kenosha County (Part) Area	0 to 2.5	--	--	--	--
	2.5 to 7.5	--	--	--	--
	7.5 to 12.5	--	--	--	--
	12.5 to 17.5	--	--	--	--
	17.5 to 22.5	--	--	--	--
	22.5 to 27.5	--	--	--	--
	27.5 to 32.5	--	--	--	--
	32.5 to 37.5	--	--	--	--
	37.5 to 42.5	9,031	--	--	--
	42.5 to 47.5	2,783	--	--	--
	47.5 to 52.5	--	--	--	--
	52.5 to 57.5	31,818	4,786	--	25,552
	57.5 to 62.5	58,906	51,418	130,136	235,441
	62.5 to 67.5	948,095	1,075,679	1,071,513	1,042,745
	67.5 to 72.5	--	--	--	--
72.5+	--	--	--	--	
Subtotal	--	1,050,633	1,131,883	1,201,649	1,303,738
Kenosha County (Part)Total		2,791,627	2,983,887	3,153,088	3,432,277

<sup>a</sup> The vehicle miles of travel set forth in this table represent arterial vehicle miles of travel only. Nonarterial vehicle miles of travel would increase the total average weekday vehicle miles of travel by approximately 10 percent.

Source: SEWRPC

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#217949

Tables 1 and 3 list all projects with air quality impact proposed in the RTSP, along with the plan-recommended implementation schedule, and identifies the plan projects which are included in the year 2013-2016 TIP. Table 7 lists all projects with air quality impact, so-called “nonexempt” projects in the year 2013-2016 TIP and confirms that they are included in the fiscally-constrained RTP and confirms that their schedule in the improvement program is consistent with their schedule for project completion proposed in the RTP.<sup>9</sup>

Table 8 presents for the years 2015, 2020, 2025, and 2035 forecast VOC, NO<sub>x</sub>, SO<sub>2</sub>, and PM<sub>2.5</sub> emissions from the transportation system within the three-county PM<sub>2.5</sub> nonattainment area under the RTP and TIP, and compares the forecast emissions to the year 2020 and 2025 transportation system emission budgets included in maintenance plan for the 2006 24-hour PM<sub>2.5</sub> NAAQS submitted to USEPA on June 5, 2012. In all cases, the RTP and TIP forecast emissions are less than the emissions budgets in the maintenance plan. Thus, this conformity criterion is shown to be fully met for the 2006 24-hour PM<sub>2.5</sub> NAAQS by the fiscally-constrained RTP and 2013-2016 TIP.

Table 8 presents for the years 2015, 2025, and 2035 forecast VOC and NO<sub>x</sub> emissions from the transportation system within the Wisconsin portion of the Chicago-Naperville, IL-IN-WI moderate nonattainment area for the 2008 eight-hour ozone NAAQS under the RTP and the TIP, and compares the forecast emissions to the base year 2011 estimated emissions. In all cases, the forecast emissions are less than the estimated year 2011 emissions utilized in the build no greater than baseline emissions test (40 CFR 93.119); thus this conformity criterion is fully met for the 2008 eight-hour ozone NAAQS by the fiscally-constrained RTP and 2013-2016 TIP.

As described earlier in this report, the year 2013-2016 TIP is consistent with the RTP and the plan’s implementation schedule. All TIP projects, that is, projects with air quality impacts, are included in the plan. Also, the TIP includes all projects essential to implement the RTP on schedule. The satisfaction of these two tests has been demonstrated in Tables 1, 3, and 7.

CTH/cth  
5/6/2014  
#217931

<sup>9</sup>All 2013-2016 TIP projects can be found at the Commission’s TIP webpage ([www.sewrpc.org/tip](http://www.sewrpc.org/tip)).

Table 7

TRANSPORTATION IMPROVEMENT PROGRAM FOR THE MILWAUKEE TRANSPORTATION MANAGEMENT AREA -- MILWAUKEE COUNTY 2013-2016

PROJECT SPONSOR	PROJECT			ESTIMATED COSTS (\$1,000)						AIR QUAL STAT	
	NO	DESCRIPTION / STATE ID	TYPE	2013	2014	2015	2016	Total			
STATE OF WISCONSIN	57 (63)	RECONSTRUCTION WITH ADDITIONAL TRAFFIC LANES OF IH-94 FROM THE ILLINOIS STATE LINE TO THE MITCHELL INTERCHANGE IN MILWAUKEE, RACINE, AND KENOSHA COUNTIES (32.50 MI)	HI	DETAIL COSTS	PE	1,630.0	0.0	0.0	0.0	1,630.0	NON-EXEMPT
					ROW	0.0	0.0	0.0	0.0	0.0	
					CONST	36,569.9	30,859.4	389.3	48,044.6	115,863.2	
					OTHER	918.5	288.2	0.0	6,683.2	7,889.9	
					TOTAL	39,118.4	31,147.6	389.3	54,727.8	125,383.1	
SOURCE OF FUNDS COMB	LOCAL	122.0	0.0	0.0	0.0	122.0					
	STATE	24,327.2	30,859.4	389.3	24,257.0	79,832.9					
	FEDERAL	14,669.2	288.2	0.0	30,470.8	45,428.2					
	TOTAL	39,118.4	31,147.6	389.3	54,727.8	125,383.1					
	8000076										
	58 (17)	RECONSTRUCTION OF THE ZOO INTERCHANGE AND APPROACHES ON IH-94, IH 894 AND USH 45 IN MILWAUKEE COUNTY	HI	DETAIL COSTS	PE	0.0	0.0	0.0	0.0	0.0	NON-EXEMPT
					ROW	7,950.0	4,225.0	0.0	0.0	12,175.0	
					CONST	257,440.5	265,665.0	355,062.4	136,210.0	1,014,377.9	
					OTHER	60,344.7	3,521.0	786.0	0.0	64,651.7	
					TOTAL	325,735.2	273,411.0	355,848.4	136,210.0	1,091,204.6	
SOURCE OF FUNDS COMB	LOCAL	2,018.4	0.0	0.0	0.0	2,018.4					
	STATE	205,536.3	208,667.8	267,663.2	56,175.9	738,043.2					
	FEDERAL	118,180.5	64,743.2	88,185.2	80,034.1	351,143.0					
	TOTAL	325,735.2	273,411.0	355,848.4	136,210.0	1,091,204.6					
	8000205	1060-33-00									
	59 (64)	RECONSTRUCTION WITH ADDITIONAL LANES OF USH 45/STH 100 FROM ST. MARTINS RD TO COLLEGE AVE IN THE CITY OF FRANKLIN (2.98 MI)	HI	DETAIL COSTS	PE	0.0	0.0	0.0	0.0	0.0	NON-EXEMPT
					ROW	0.0	0.0	0.0	0.0	0.0	
					CONST	0.0	0.0	0.0	24,882.0	24,882.0	
					OTHER	0.0	0.0	0.0	0.0	0.0	
					TOTAL	0.0	0.0	0.0	24,882.0	24,882.0	
SOURCE OF FUNDS NHS	LOCAL	0.0	0.0	0.0	23.2	23.2					
	STATE	0.0	0.0	0.0	4,971.8	4,971.8					
	FEDERAL	0.0	0.0	0.0	19,887.0	19,887.0					
	TOTAL	0.0	0.0	0.0	24,882.0	24,882.0					
	8000135	2040-14-70									
	60 (66)	RECONSTRUCTION WITH ADDITIONAL LANES OF 27TH ST (STH 241) FROM W DREXEL AVE TO COLLEGE AVE (CTH ZZ) IN THE CITIES OF FRANKLIN AND OAK CREEK (2.0 MI)	HI	DETAIL COSTS	PE	0.0	0.0	0.0	0.0	0.0	NON-EXEMPT
					ROW	0.0	0.0	0.0	0.0	0.0	
					CONST	0.0	0.0	0.0	24,695.0	24,695.0	
					OTHER	0.0	0.0	0.0	0.0	0.0	
					TOTAL	0.0	0.0	0.0	24,695.0	24,695.0	
SOURCE OF FUNDS STP-O	LOCAL	0.0	0.0	0.0	1,250.0	1,250.0					
	STATE	0.0	0.0	0.0	4,689.0	4,689.0					
	FEDERAL	0.0	0.0	0.0	18,756.0	18,756.0					
	TOTAL	0.0	0.0	0.0	24,695.0	24,695.0					
	8009941	2265-16-70									
MILWAUKEE COUNTY	91 (106)	RECONSTRUCTION WITH ADDITIONAL TRAFFIC LANES OF S 76TH ST (CTH U) FROM 600' N OF HIGH ST TO CARTER BLVD IN THE CITY OF FRANKLIN (2.0 MI)	HI	DETAIL COSTS	PE	1,150.0	0.0	0.0	0.0	1,150.0	NON-EXEMPT
					ROW	420.0	0.0	0.0	0.0	420.0	
					CONST	0.0	8,633.4	0.0	0.0	8,633.4	
					OTHER	0.0	0.0	0.0	0.0	0.0	
					TOTAL	1,570.0	8,633.4	0.0	0.0	10,203.4	
SOURCE OF FUNDS STP-M	LOCAL	314.0	1,766.6	0.0	0.0	2,080.6					
	STATE	0.0	0.0	0.0	0.0	0.0					
	FEDERAL	1,256.0	6,866.8	0.0	0.0	8,122.8					
	TOTAL	1,570.0	8,633.4	0.0	0.0	10,203.4					
	4000234	2160-10-70									
	82 (100)	RECONSTRUCTION WITH ADDITIONAL TRAFFIC LANES OF S 13TH ST (CTH V) FROM W RAWSON AVE (CTH BB) TO PUETZ RD AND RECONSTRUCTION TO SAME CAPACITY FROM PUETZ RD TO RYAN RD IN THE CITY OF OAK CREEK (3.00 MI)	HI	DETAIL COSTS	PE	0.0	800.0	1,000.0	0.0	1,800.0	NON-EXEMPT
					ROW	0.0	0.0	500.0	500.0	1,000.0	
					CONST	0.0	0.0	0.0	4,000.0	4,000.0	
					OTHER	0.0	0.0	0.0	0.0	0.0	
					TOTAL	0.0	800.0	1,500.0	4,500.0	6,800.0	
SOURCE OF FUNDS	LOCAL	0.0	800.0	1,500.0	4,500.0	6,800.0					
	STATE	0.0	0.0	0.0	0.0	0.0					
	FEDERAL	0.0	0.0	0.0	0.0	0.0					
	TOTAL	0.0	800.0	1,500.0	4,500.0	6,800.0					
	4000032										
MILWAUKEE (CITY)	173 (226)	IMPLEMENTATION OF THE MILWAUKEE DOWNTOWN CONNECTOR STREETCAR BETWEEN THE MILWAUKEE INTERMODAL STATION AND AN AREA NORTH OF THE CENTRAL BUSINESS DISTRICT	TE	DETAIL COSTS	PE	0.0	0.0	0.0	0.0	0.0	NON-EXEMPT
					ROW	100.0	0.0	0.0	0.0	100.0	
					CONST	56,500.0	0.0	0.0	0.0	56,500.0	
					OTHER	0.0	0.0	0.0	0.0	0.0	
					TOTAL	56,600.0	0.0	0.0	0.0	56,600.0	
SOURCE OF FUNDS IH-C/S	LOCAL	8,490.0	0.0	0.0	0.0	8,490.0					
	STATE	0.0	0.0	0.0	0.0	0.0					
	FEDERAL	48,110.0	0.0	0.0	0.0	48,110.0					
	TOTAL	56,600.0	0.0	0.0	0.0	56,600.0					
	4109958										



Table 7

TRANSPORTATION IMPROVEMENT PROGRAM FOR THE MILWAUKEE TRANSPORTATION MANAGEMENT AREA -- WAUKESHA COUNTY 2013-2016

PROJECT SPONSOR	PROJECT			ESTIMATED COSTS (\$1,000)						AIR QUAL STAT
	NO	DESCRIPTION / STATE ID	TYPE	2013	2014	2015	2016	Total		
STATE OF WISCONSIN	310  (434)	CONSTRUCTION OF THE WAUKESHA BYPASS WITH ADDITIONAL LANES FROM SUMMIT AVE TO GENESEE RD IN THE CITY AND TOWN OF WAUKESHA (3.80 MI)	HI	DETAIL COSTS	PE	0.0	0.0	0.0	0.0	0.0
					ROW	2,800.0	0.0	0.0	0.0	2,800.0
					CONST	0.0	0.0	28,750.0	0.0	28,750.0
					OTHER	0.0	0.0	0.0	0.0	0.0
				TOTAL	2,800.0	0.0	28,750.0	0.0	31,550.0	
SOURCE OF FUNDS STP-O	LOCAL	0.0	0.0	0.0	0.0	0.0				
	STATE	2,800.0	0.0	5,750.0	0.0	8,550.0				
	FEDERAL	0.0	0.0	23,000.0	0.0	23,000.0				
	TOTAL	2,800.0	0.0	28,750.0	0.0	31,550.0				
		8009781	2788-00-71							
	311  (435)	RECONSTRUCTION WITH ADDITIONAL LANES OF SUMMIT AVE (STH 67) FROM CTH DR (DELAFIELD RD) TO SUMMIT AVE IN THE CITY OF OCONOMOWOC (2.49 MI)	HI	DETAIL COSTS	PE	0.0	0.0	0.0	0.0	0.0
					ROW	0.0	0.0	0.0	0.0	0.0
					CONST	0.0	21,165.0	0.0	0.0	21,165.0
					OTHER	0.0	0.0	0.0	0.0	0.0
				TOTAL	0.0	21,165.0	0.0	0.0	21,165.0	
SOURCE OF FUNDS STP-O	LOCAL	0.0	0.0	0.0	0.0	0.0				
	STATE	0.0	4,233.0	0.0	0.0	4,233.0				
	FEDERAL	0.0	16,932.0	0.0	0.0	16,932.0				
	TOTAL	0.0	21,165.0	0.0	0.0	21,165.0				
		8009926	3030-08-70							
	312  (436)	RECONSTRUCTION WITH ADDITIONAL LANES OF STH 83 FROM PERKINS RD TO GLACIER PASS (NORTH OF USH 18) IN THE VILLAGE OF WALES AND THE TOWN OF GENESEE (2.76 MI)	HI	DETAIL COSTS	PE	0.0	0.0	0.0	0.0	0.0
					ROW	0.0	0.0	0.0	0.0	0.0
					CONST	9,430.0	0.0	0.0	0.0	9,430.0
					OTHER	0.0	0.0	0.0	0.0	0.0
				TOTAL	9,430.0	0.0	0.0	0.0	9,430.0	
SOURCE OF FUNDS STP-O	LOCAL	0.0	0.0	0.0	0.0	0.0				
	STATE	1,886.0	0.0	0.0	0.0	1,886.0				
	FEDERAL	7,544.0	0.0	0.0	0.0	7,544.0				
	TOTAL	9,430.0	0.0	0.0	0.0	9,430.0				
		8000063	1330-18-70							
WAUKESHA COUNTY	328  (455)	RECONSTRUCTION OF WEST WAUKESHA BYPASS WITH ADDITIONAL LANES FROM USH 18 TO NORTHVIEW RD IN THE TOWN AND CITY OF WAUKESHA (5.30 MI)	HI	DETAIL COSTS	PE	0.0	0.0	0.0	0.0	0.0
					ROW	500.0	0.0	0.0	0.0	500.0
					CONST	0.0	3,600.0	0.0	0.0	3,600.0
					OTHER	0.0	50.0	0.0	0.0	50.0
				TOTAL	500.0	3,650.0	0.0	0.0	4,150.0	
SOURCE OF FUNDS STP-M	LOCAL	500.0	730.0	0.0	0.0	1,230.0				
	STATE	0.0	0.0	0.0	0.0	0.0				
	FEDERAL	0.0	2,920.0	0.0	0.0	2,920.0				
	TOTAL	500.0	3,650.0	0.0	0.0	4,150.0				
		7009991	2788-02-00							
	329  (456)	RECONSTRUCTION WITH ADDITIONAL LANES OF JANESVILLE RD (CTH L) FROM RACINE AVE (CTH Y) TO MOORLAND RD (CTH O) IN THE CITY OF MUSKEGO (2.30 MI)	HI	DETAIL COSTS	PE	0.0	0.0	0.0	0.0	0.0
					ROW	0.0	0.0	0.0	0.0	0.0
					CONST	8,954.0	0.0	0.0	0.0	8,954.0
					OTHER	0.0	0.0	0.0	0.0	0.0
				TOTAL	8,954.0	0.0	0.0	0.0	8,954.0	
SOURCE OF FUNDS STP-M	LOCAL	3,401.0	0.0	0.0	0.0	3,401.0				
	STATE	0.0	0.0	0.0	0.0	0.0				
	FEDERAL	5,553.0	0.0	0.0	0.0	5,553.0				
	TOTAL	8,954.0	0.0	0.0	0.0	8,954.0				
		7000010	2380-00-73							
	330	RECONSTRUCTION WITH ADDITIONAL LANES OF CTH M (NORTH AVE) FROM CALHOUN RD TO PILGRIM RD IN THE CITY OF BROOKFIELD (1.0 MI)	HI	DETAIL COSTS	PE	0.0	0.0	0.0	550.0	550.0
					ROW	0.0	0.0	0.0	0.0	0.0
					CONST	0.0	0.0	0.0	0.0	0.0
					OTHER	0.0	0.0	0.0	0.0	0.0
				TOTAL	0.0	0.0	0.0	550.0	550.0	
SOURCE OF FUNDS	LOCAL	0.0	0.0	0.0	550.0	550.0				
	STATE	0.0	0.0	0.0	0.0	0.0				
	FEDERAL	0.0	0.0	0.0	0.0	0.0				
	TOTAL	0.0	0.0	0.0	550.0	550.0				
		7009988								
	331  (448)	RECONSTRUCTION WITH ADDITIONAL LANES OF CTH M (NORTH AVE) FROM PILGRIM RD TO EAST COUNTY LINE IN THE CITY OF BROOKFIELD (2.0 MI)	HI	DETAIL COSTS	PE	0.0	890.0	0.0	0.0	890.0
					ROW	0.0	0.0	2,400.0	400.0	2,800.0
					CONST	0.0	0.0	0.0	0.0	0.0
					OTHER	0.0	0.0	0.0	0.0	0.0
				TOTAL	0.0	890.0	2,400.0	400.0	3,690.0	
SOURCE OF FUNDS	LOCAL	0.0	890.0	2,400.0	400.0	3,690.0				
	STATE	0.0	0.0	0.0	0.0	0.0				
	FEDERAL	0.0	0.0	0.0	0.0	0.0				
	TOTAL	0.0	890.0	2,400.0	400.0	3,690.0				
		7000012								
	332  (458)	RECONSTRUCTION WITH ADDITIONAL LANES OF SILVER SPRING DR (CTH VV) FROM CTH Y (LANNON RD) TO JACKSON DR IN THE VILLAGE OF MEMONEE FALLS (1.50 MI)	HI	DETAIL COSTS	PE	0.0	0.0	0.0	0.0	0.0
					ROW	0.0	0.0	0.0	0.0	0.0
					CONST	10,181.0	0.0	0.0	0.0	10,181.0
					OTHER	0.0	0.0	0.0	0.0	0.0
				TOTAL	10,181.0	0.0	0.0	0.0	10,181.0	
SOURCE OF FUNDS STP-M	LOCAL	2,036.0	0.0	0.0	0.0	2,036.0				
	STATE	0.0	0.0	0.0	0.0	0.0				
	FEDERAL	8,145.0	0.0	0.0	0.0	8,145.0				
	TOTAL	10,181.0	0.0	0.0	0.0	10,181.0				
		7000022	2753-06-01							

Source: SEWRPC.

Table 7

TRANSPORTATION IMPROVEMENT PROGRAM FOR THE MILWAUKEE TRANSPORTATION MANAGEMENT AREA -- WAUKESHA COUNTY 2013-2016

PROJECT SPONSOR	PROJECT			ESTIMATED COSTS (\$1,000)						AIR QUAL STAT	
	NO	DESCRIPTION / STATE ID	TYPE		2013	2014	2015	2016	Total		
WAUKESHA (CITY)	358	RECONSTRUCTION WITH ADDITIONAL LANES OF MEADOWBROOK RD (WEST WAUKESHA BYPASS) FROM	HI	<i>DETAIL COSTS</i>	<i>PE</i>	0.0	0.0	0.0	0.0	0.0	NON-EXEMPT
					<i>ROW</i>	0.0	0.0	0.0	0.0	0.0	
	<i>CONST</i>	0.0		2,000.0	0.0	0.0	2,000.0				
	<i>OTHER</i>	0.0		0.0	0.0	0.0	0.0				
	<i>TOTAL</i>	0.0		2,000.0	0.0	0.0	2,000.0				
	<i>SOURCE OF FUNDS</i>	<i>LOCAL</i>		0.0	2,000.0	0.0	0.0	2,000.0			
		<i>STATE</i>		0.0	0.0	0.0	0.0	0.0			
		<i>FEDERAL</i>		0.0	0.0	0.0	0.0	0.0			
<i>TOTAL</i>		0.0	2,000.0	0.0	0.0	2,000.0					
	(492)	NORTHVIEW RD TO ROLLING RIDGE DR IN THE CITY OF WAUKESHA (0.53 MI)									
		7370015									



Table 7

**TRANSPORTATION IMPROVEMENT PROGRAM FOR THE KENOSHA, RACINE, WALWORTH TRANSPORTATION MANAGEMENT  
AREA -- KENOSHA COUNTY 2013-2016**

PROJECT SPONSOR	PROJECT			ESTIMATED COSTS (\$1,000)						AIR QUAL STAT	
	NO	DESCRIPTION / STATE ID	TYPE		2013	2014	2015	2016	Total		
STATE OF WISCONSIN	391  (538)	RECONSTRUCTION WITH ADDITIONAL TRAFFIC LANES OF STH 50 (75TH ST) FROM IH 94 TO 43RD AVE IN THE CITY OF KENOSHA AND VILLAGE OF PLEASANT PRAIRIE (4.45 MI)	HI	DETAIL COSTS	PE	0.0	0.0	0.0	0.0	0.0	NON-EXEMPT
					ROW	0.0	6,000.0	0.0	0.0	6,000.0	
					CONST	0.0	0.0	0.0	0.0	0.0	
					OTHER	0.0	0.0	0.0	0.0	0.0	
				TOTAL	0.0	6,000.0	0.0	0.0	6,000.0		
				SOURCE OF FUNDS	LOCAL	0.0	0.0	0.0	0.0	0.0	
STATE	0.0	6,000.0	0.0	0.0	6,000.0						
FEDERAL	0.0	0.0	0.0	0.0	0.0						
TOTAL	0.0	6,000.0	0.0	0.0	6,000.0						
		8001026	1310-10-70								
KENOSHA COUNTY	396  (545)	RECONSTRUCTION WITH ADDITIONAL LANES OF CTH K (60TH ST) FROM CTH H (88TH AVE) TO UP RAILROAD IN KENOSHA COUNTY (0.92 MI)	HI	DETAIL COSTS	PE	0.0	0.0	0.0	0.0	0.0	NON-EXEMPT
					ROW	0.0	0.0	0.0	0.0	0.0	
					CONST	3,700.0	0.0	0.0	0.0	3,700.0	
					OTHER	0.0	0.0	0.0	0.0	0.0	
				TOTAL	3,700.0	0.0	0.0	0.0	3,700.0		
				SOURCE OF FUNDS	LOCAL	3,700.0	0.0	0.0	0.0	3,700.0	
STATE	0.0	0.0	0.0	0.0	0.0						
FEDERAL	0.0	0.0	0.0	0.0	0.0						
TOTAL	3,700.0	0.0	0.0	0.0	3,700.0						
		1009996									
	591	RECONSTRUCTION WITH ADDITIONAL LANES OF CTH S FROM CTH H TO BRUMBACK BLVD IN KENOSHA COUNTY (1.79 MI)	HI	DETAIL COSTS	PE	0.0	696.3	0.0	0.0	696.3	NON-EXEMPT
					ROW	0.0	0.0	0.0	0.0	0.0	
					CONST	0.0	0.0	0.0	0.0	0.0	
					OTHER	0.0	0.0	250.0	0.0	250.0	
				TOTAL	0.0	696.3	250.0	0.0	946.3		
				SOURCE OF FUNDS	LOCAL	0.0	322.5	115.8	0.0	438.3	
STATE	0.0	0.0	0.0	0.0	0.0						
FEDERAL	0.0	373.8	134.2	0.0	508.0						
TOTAL	0.0	696.3	250.0	0.0	946.3						
		1009960	3210-00-05								

Table 7

TRANSPORTATION IMPROVEMENT PROGRAM FOR THE KENOSHA, RACINE, WALWORTH TRANSPORTATION MANAGEMENT AREA -- RACINE COUNTY 2013-2016

PROJECT SPONSOR	PROJECT			ESTIMATED COSTS (\$1,000)						AIR QUAL STAT	
	NO	DESCRIPTION / STATE ID	TYPE		2013	2014	2015	2016	Total		
STATE OF WISCONSIN	429  (735)	RECONSTRUCTION AND REALIGNMENT WITH ADDITIONAL TRAFFIC LANES OF STH 38 FROM CTH K TO OAKWOOD RD IN RACINE AND MILWAUKEE COUNTIES (8.90 MILES)  8009719                      2290-20-00	HI	DETAIL COSTS	PE	2,000.0	5,000.0	0.0	0.0	7,000.0	NON-EXEMPT
					ROW	0.0	31,650.0	0.0	0.0	31,650.0	
				CONST	0.0	0.0	0.0	0.0	0.0		
				OTHER	0.0	0.0	0.0	0.0	0.0		
				TOTAL	2,000.0	36,650.0	0.0	0.0	38,650.0		
				SOURCE OF FUNDS	LOCAL	0.0	0.0	0.0	0.0	0.0	
STATE	2,000.0	36,650.0	0.0	0.0	38,650.0						
FEDERAL	0.0	0.0	0.0	0.0	0.0						
TOTAL	2,000.0	36,650.0	0.0	0.0	38,650.0						
RACINE COUNTY	432  (600)	RECONSTRUCTION WITH ADDITIONAL LANES OF CTH C FROM AIRLINE RD TO SUNNYSLOPE DR IN THE VILLAGE OF MOUNT PLEASANT (0.7 MI)  3009998                      2806-09-70	HI	DETAIL COSTS	PE	0.0	0.0	0.0	0.0	0.0	NON-EXEMPT
					ROW	0.0	0.0	0.0	0.0	0.0	
				CONST	2,460.0	0.0	0.0	0.0	2,460.0		
				OTHER	0.0	0.0	0.0	0.0	0.0		
				TOTAL	2,460.0	0.0	0.0	0.0	2,460.0		
				SOURCE OF FUNDS	LOCAL	540.0	0.0	0.0	0.0	540.0	
STATE	0.0	0.0	0.0	0.0	0.0						
FEDERAL	1,920.0	0.0	0.0	0.0	1,920.0						
TOTAL	2,460.0	0.0	0.0	0.0	2,460.0						

Table 7

TRANSPORTATION IMPROVEMENT PROGRAM FOR THE KENOSHA, RACINE, WALWORTH TRANSPORTATION MANAGEMENT AREA -- WALWORTH COUNTY 2013-2016

PROJECT SPONSOR	PROJECT			ESTIMATED COSTS (\$1,000)						AIR QUAL STAT	
	NO	DESCRIPTION / STATE ID	TYPE		2013	2014	2015	2016	Total		
STATE OF WISCONSIN	468  (679)	RECONSTRUCTION WITH ADDITIONAL LANES OF STH 50 FROM NORTH SHORE DR TO STH 67 IN WALWORTH COUNTY (4.20 MI)      8000138                      3170-01-70	HI	<i>DETAIL COSTS</i>	<i>PE ROW</i>	0.0	0.0	2,000.0	0.0	2,000.0	NON-EXEMPT
					<i>CONST</i>	0.0	0.0	0.0	0.0	0.0	
				<i>OTHER</i>	0.0	0.0	0.0	0.0	0.0		
				<i>TOTAL</i>	0.0	0.0	2,000.0	0.0	2,000.0		
	<i>SOURCE OF FUNDS</i>			<i>LOCAL STATE</i>	0.0	0.0	0.0	0.0	0.0		
	<i>STP-0</i>			<i>FEDERAL</i>	0.0	0.0	400.0	0.0	400.0		
				<i>FEDERAL</i>	0.0	0.0	1,600.0	0.0	1,600.0		
				<i>TOTAL</i>	0.0	0.0	2,000.0	0.0	2,000.0		

Table 8

**CONFORMITY TESTS OF THE FISCALLY CONSTRAINED YEAR 2035 REGIONAL TRANSPORTATION SYSTEM PLAN  
AND 2013-2016 TRANSPORTATION IMPROVEMENT PROGRAM**

Area	Conformity Analysis			Forecast Pollutant Emissions Tests (Tons)							
				Volatile Organic Compounds		Nitrogen Oxides		Fine Particulate		Sulfur Dioxide	
	Test	Year	Month	Test Value (Not to be Exceeded)	Forecast Emissions	Test Value (Not to be Exceeded)	Forecast Emissions	Test Value (Not to be Exceeded)	Forecast Emissions	Test Value (Not to be Exceeded)	Forecast Emissions
Three-County Fine Particulate Maintenance Area (2006 24-Hour Fine Particulate NAAQS) <sup>a</sup>	Budget Test <sup>c</sup>	2015	January	--	21.439	--	37.538	--	2.320	--	0.335
		2020	January	15.890	12.960	32.620	26.295	2.330	1.907	0.390	0.316
		2025	January	11.980	9.379	28.690	22.655	2.160	1.742	0.380	0.306
		2035	January	11.980	7.922	28.690	21.386	2.160	1.686	0.380	0.311
Wisconsin Portion of the Chicago-Naperville, IL-IN-WI Marginal Ozone Nonattainment Area (2008 Eight-Hour Ozone NAAQS) <sup>b</sup>	Build No Greater than Baseline 2011 Emissions (40 CFR 93.119)	2015	July	1.389	1.110	3.622	2.634	--	--	--	--
		2025	July	1.389	0.770	3.622	1.563	--	--	--	--
		2035	July	1.389	0.715	3.622	1.506	--	--	--	--

Source: SEWRPC and Wisconsin Department of Natural Resources.

<sup>a</sup> Milwaukee, Racine, and Waukesha Counties.

<sup>b</sup> That portion of Kenosha County east of IH 94

<sup>c</sup> Year 2020 and 2025 budgets for Volatile Organic Compounds, Nitrogen Oxides, Fine Particulates, and Sulfur Dioxide are documented in the maintenance plan submitted by the Wisconsin Department of Natural Resources to USEPA on June 5, 2012. The maintenance plan has been approved by USEPA and the three-county area redesignated to attainment effective April 22, 2014.

## APPENDICES

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## Appendix A

### PROPOSED CONFORMITY ANALYSIS OF THE YEAR 2035 REGIONAL TRANSPORTATION PLAN AND YEAR 2013-2016 TRANSPORTATION IMPROVEMENT PROGRAM

- Years for Analysis [Years For Which Projection of Emissions Will Be Made For The Regional Transportation Improvement Program (TIP)/Transportation Plan (RTP)], Planning Assumptions and Forecasts, and Travel Simulation Models
  - Proposed years are 2015, 2020, 2025, and 2035. Emission projections will be based on SEWRPC intermediate demographic and economic growth forecasts from year 2035 regional land use plan.
  - Emission projections will be based upon travel and traffic forecasts prepared from the Commission's current travel simulation models—developed with 2000-2001 data and have been validated to the years 2008 estimated actual vehicle miles of travel.
- Emission Budget Tests for Conformity
  - Three-County 24-Hour Fine Particulate (PM<sub>2.5</sub>) maintenance area
    - MOVES2010a based budgets included in the 24-hour fine particulate redesignation request and maintenance plan submitted to US EPA in June of 2012
      - 2015, 2020, 2025, and 2035 TIP/RTP PM<sub>2.5</sub>, VOC, SO<sub>2</sub>, and NO<sub>x</sub> emission forecasts must not exceed the 2020 and 2025 PM<sub>2.5</sub>, VOC, and NO<sub>x</sub> Budgets
      - MOVES2010b model will be used
      - Emission estimates will be compared to the proposed PM<sub>2.5</sub>, NO<sub>x</sub>, SO<sub>2</sub>, and VOC budgets included in 24-hour fine particulate redesignation request and maintenance plan submitted to US EPA in June of 2012.
        - Fine Particulate (PM<sub>2.5</sub>)—2.33 tons for 2020 and 2.16 for 2025
        - Nitrogen Oxides (NO<sub>x</sub>)—32.62 tons for 2020 and 28.69 tons for 2025
        - Sulfur Dioxide (SO<sub>2</sub>)—0.39 tons for 2020 and 0.38 tons for 2025
        - Volatile Organic Compounds (VOC)—15.89 tons for 2020 and 11.98 tons for 2025
- Build No Greater than Baseline Year Tests for Conformity
  - Partial Kenosha County 2008 Ozone NAAQS nonattainment area comprised of Pleasant Prairie and Somers Townships
    - Baseline year will be 2011
    - Emission model will be MOVES2010b localized inputs will be provided by WDNR for years 2011, 2015, 2025, and 2035
    - NO<sub>x</sub> —Year 2011 baseline estimate is 3.62 tons
    - VOC—Year 2011 baseline estimate is 1.39 tons
    - 2015, 2025, and 2035 TIP/RTP NO<sub>x</sub>, and VOC emission forecasts must not exceed the year 2011 NO<sub>x</sub>, and VOC baseline emission estimates
- The conformity analysis will include a comparison of the projected growth in vehicle-miles of travel (VMT) in the SIP to estimates of actual growth in VMT through 2010 in Southeastern Wisconsin prepared by WisDOT and based on actual traffic counts (HPMS universe counts)

- Emission model will be MOVES2010b
  - National defaults will be used with the exception of the following localized input data:
    - Age Distribution (2011, 2015, 2020, 2025, 2035) to be provided by WDNR
    - Average Speed Distribution (2011, 2015, 2020, 2025, 2035) to be provided by SEWRPC
    - Fuels (2011, 2015, 2020, 2025, 2035) to be provided by WDNR
    - Inspection and Maintenance Program (2011, 2015, 2020, 2025, 2035) to be provided by WDNR
    - Meteorology (2011, 2015, 2020, 2025, 2035) to be provided by WDNR
    - Ramp (2011, 2015, 2020, 2025, 2035) to be provided by SEWRPC
    - Road Type (2011, 2015, 2020, 2025, 2035) to be provided by SEWRPC
    - Source Type Population (2011, 2015, 2020, 2025, 2035) to be provided by WDNR and updated by SEWRPC based on VMT Estimates
    - Vehicle Type VMT (2011, 2015, 2020, 2025, 2035) to be provided by WDNR and updated by SEWRPC based on VMT Estimates
    - Month VMT Fraction (2011, 2015, 2020, 2025, 2035) to be provided by WDNR
    - Day VMT Fraction (2011, 2015, 2020, 2025, 2035) to be provided by WDNR
    - Hour VMT Fraction (2011, 2015, 2020, 2025, 2035) to be provided by WDNR and Freeway Data updated by SEWRPC
- SEWRPC will run the MOVES2010b model to develop emission estimates and will provide WDNR copies of the MOVES run specifications, input files, and MOVES outputs with the draft conformity demonstration.

CTH\cth  
5/7/2014  
#218052



## 1990-2010 SOUTHEAST WISCONSIN DVMT SUMMARY BASED ON HPMS UNIVERSE DATA

Year	KENOSHA	MILWAUKEE	OZAUKEE	RACINE	WALWORTH	WASHINGTON	WAUKESHA	Total	% Change	State % Chg.
1990	2,731,000	15,756,000	1,835,000	3,321,000	2,172,000	2,177,000	6,712,000	34,704,000	4.38%	2.76%
1991	2,791,000	16,076,000	1,864,000	3,321,000	2,135,000	2,208,000	7,124,000	35,519,000	2.35%	2.67%
1992	2,913,000	16,380,000	2,013,000	3,413,000	2,233,000	2,364,000	7,330,000	36,646,000	3.17%	4.49%
1993	2,875,000	17,328,000	2,130,000	3,542,000	2,280,000	2,504,000	7,777,000	38,436,000	4.88%	2.76%
1994	3,118,000	16,733,000	2,062,000	3,518,000	2,236,000	2,558,000	7,639,000	37,864,000	-1.49%	3.01%
1995	3,169,000	16,931,000	2,180,000	3,566,000	2,288,000	2,691,000	8,162,000	38,987,000	2.97%	2.23%
1996	3,119,800	16,988,500	1,990,000	3,631,500	2,334,300	2,739,800	8,248,900	39,052,800	0.17%	2.42%
1997	3,097,500	16,619,800	2,154,500	3,605,400	2,318,300	2,703,897	8,612,300	39,111,697	0.15%	2.07%
1998	3,142,600	16,612,700	2,272,500	3,688,000	2,451,000	2,790,100	8,802,300	39,759,200	1.66%	4.32%
1999	3,256,800	17,243,000	2,282,300	3,710,200	2,524,200	2,930,200	8,720,600	40,667,300	2.28%	1.63%
2000	3,244,200	17,550,400	2,290,000	3,694,900	2,539,700	3,051,300	8,938,100	41,308,600	1.58%	0.54%
2001	3,203,100	17,385,800	2,195,800	3,641,900	2,525,300	3,034,200	8,727,100	40,713,200	-1.44%	0.00%
2002	3,284,600	17,154,400	2,334,400	3,729,000	2,583,500	3,127,000	8,847,700	41,060,600	0.85%	2.58%
2003	3,330,400	17,661,400	1,977,800	3,781,500	2,622,500	3,087,700	9,173,300	41,634,600	1.40%	1.48%
2004	3,375,800	17,716,600	2,363,200	3,818,700	2,670,100	3,165,900	9,291,700	42,402,000	1.84%	1.31%
2005	3,500,700	16,671,500	2,375,500	3,772,800	2,646,500	3,228,600	9,457,100	41,652,700	-1.77%	-0.63%
2006	3,541,300	16,883,400	2,347,500	3,720,600	2,678,400	3,421,300	9,720,800	42,313,300	1.59%	-1.03%
2007	3,533,900	17,065,600	2,860,700	3,680,200	2,781,700	3,303,200	9,694,200	42,919,500	1.43%	0.15%
2008	3,627,700	16,414,500	2,560,700	4,018,000	2,786,600	3,217,200	9,656,600	42,281,300	-1.49%	-3.41%
2009	3,638,700	17,175,200	3,671,800	4,059,100	2,874,200	3,365,800	10,061,100	44,845,900	6.07%	1.21%
2010	3,749,500	15,805,800	2,675,600	4,071,700	3,027,000	3,729,700	11,194,200	44,253,500	-1.32%	2.17%

Appendix B

Highlighting indicates year traffic counts taken. Milwaukee County an anomaly, with about one-third of county counted each year.

City of Milwaukee counts to state standards begun in 1993. HPMS revised in 1993.

Traffic counts for HPMS updated between actual count years by statewide growth factor.

1994 HPMS VMT for District 2, especially Milwaukee and Waukesha counties, probably low due to automation problems in getting count data to transfer between computer files correctly.

**Average Daily VMT estimates taken directly from HPMS master file, not adjusted to statewide control total (which includes local roads.)** (Thus the county estimates will not match final adjusted county estimates published on the WisDOT website.)

**Most important annual growth rates for air quality purposes highlighted at bottom right.**

SUMMARY:	<u>Compound Annual Percentage Change Rates Between Actual Count Years for Each County</u>								Total - Walworth	Total
	KENOSHA	MILWAUKEE	OZAUKEE	RACINE	WALWORTH	WASHINGTON	WAUKESHA	TOTAL	(Best Data)	(Best Data)
<i>Period</i>	2002-2008	2001-2010	2001-2010	2002-2008	2002-2009	2001-2010	2000-2009	2001-2010%	2001-2010	2001-2010
<i>Annual Rate</i>	1.67%	-1.05%	2.22%	1.25%	1.53%	2.32%	1.32%	0.93%	0.47%	0.54%

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**Appendix C**

**REVIEW AGENCY CORRESPONDENCE REGARDING THE CONFORMITY OF YEAR  
2035 REGIONAL TRANSPORTATION PLAN AND THE YEAR 2013-2016  
TRANSPORTATION IMPROVEMENT PROGRAM FOR THE 2008 EIGHT-HOUR  
OZONE AND 2006 24-HOUR FINE PARTICULATE NATIONAL AMBIENT AIR  
QUALITY STANDARDS**

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**Federal Highway Administration**  
525 Junction Rd, Suite 8000  
Madison, WI 53717-2157

**Federal Transit Administration**  
200 W. Adams Street, Suite 320  
Chicago, IL 60606-5232

June 18, 2014

Mr. Kenneth R. Yunker, Executive Director  
Southeastern Wisconsin Regional Planning Commission  
W239 N1812 Rockwood Drive  
P.O. Box 1607  
Waukesha, WI 53187-1607

Dear Mr. Yunker:

The Federal Highway Administration and Federal Transit Administration jointly reviewed the Southeastern Wisconsin Regional Planning Commission's (SEWRPC) May 7, 2014 request and documentation supporting a federal determination of conformity on the update of the regional transportation plan and TIP. Principal documentation includes:

- SEWRPC Memorandum Report No. 215 *Review and Update of the Year 2035 Regional Transportation Plan (RTP)*;
- *A Transportation Improvement Program for Southeastern Wisconsin: 2013-2016* as amended (TIP); and
- SEWRPC Memorandum Report No. 217 *Assessment of Conformity of the Year 2035 Regional Transportation Plan and the Year 2013-2016 Transportation Improvement Program for the 2008 Eight-Hour Ozone and 2006 24-Hour Fine Particulate (PM2.5) National Ambient Air Quality Standards*.

The conformity demonstration relies and is based on the collective information in all three documents as well as the original 2035 RTP document, which describes the analysis and decisions leading to the base transportation plan being updated.

The RTP and TIP apply to the six-county southeastern Wisconsin metropolitan planning area consisting of Washington, Ozaukee, Waukesha, Milwaukee, Racine and Kenosha Counties. The conformity assessment and this determination pertain specifically to the following National Ambient Air Quality Standards (NAAQS) and corresponding nonattainment areas:

- 2008, 8-Hour Ozone NAAQS for the Wisconsin portion of the Chicago-Naperville (IL-IN-WI) nonattainment area, which is classified as marginal and consists of the portion of Kenosha County east of Interstate 94; and
- 2006, 24-Hour Fine Particulate (PM2.5) NAAQS for the three-county maintenance area (Milwaukee, Waukesha, and Racine Counties).

FHWA and FTA find that the RTP and TIP meet the following requirements:

- The transportation system envisioned for horizon and analysis years is described, including identification of design concept, scope, and operating policies of regionally significant additions or modifications to the existing system sufficient to determine travel times, traffic volumes, transit ridership, and relationship with expected land use;
- Significant future transportation policies, requirements, services, and activities are described;
- Fiscal constraint is demonstrated consistent with federal metropolitan transportation planning requirements, policies and guidance; and
- Latest planning assumptions are used, including:
  - Estimates of current and future population, employment, travel, and congestion;
  - Changes in transit operating policies (including fares and service levels) and assumed transit ridership since the previous conformity determination;
  - Reasonable assumptions about transit service and increases in transit fares and road and bridge tolls over time;
  - Use of the latest existing information regarding the effectiveness of the TCMs and other implementation plan measures which have already been implemented.

Interagency consultation occurred among the USEPA, Wisconsin DNR, Wisconsin DOT, FHWA, FTA and SEWRPC based on March 14, 2014 and May 7, 2014 email correspondences from SEWRPC and discussions during meetings of the Wisconsin Transportation Conformity Workgroup on January 16, 2014 and April 17, 2014. Consultation included agreement on the latest planning assumptions, latest emissions model, and appropriate conformity tests and analysis years to be used in the regional emissions analysis as documented in the SEWRPC conformity assessment report. The USEPA, Wisconsin DNR and Wisconsin DOT all provided review and comments supporting approval of the SEWRPC conformity determination.

SEWRPC provided opportunity for public comment on the updated RTP, TIP and conformity assessment during a formal public comment period from May 7 – June 9, 2014 and a public meeting on May 22, 2014.

There are no transportation control measures in approved Wisconsin air quality SIPs.

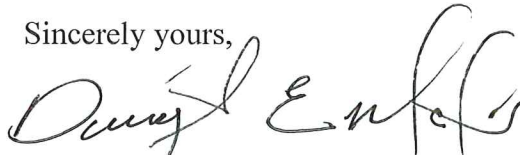
SEWRPC's regional emissions analysis demonstrates that implementation of the RTP and TIP will result in mobile source emissions within the motor vehicle emissions budget established in the Wisconsin maintenance plan for the 2006-24 hour PM<sub>2.5</sub> NAAQS and within 2011 baseline-year emissions under the interim test for the 2008 8-Hour Ozone NAAQS.

Accordingly, FHWA and FTA jointly determine the SEWRPC RTP and TIP to be in conformance with the transportation planning requirements of Titles 23 and 49 U.S.C., the CAAA, and related regulations.

This conformity finding is valid for a period of four years. A new air quality conformity determination will be required if either the RTP or TIP is modified by adding, removing or changing the implementation schedule of a regionally significant or non-exempt project or if any other triggering events specified in 40 CFR 93.104 occur. Conformity can also lapse if the RTP or TIP is not updated within the required renewal period of four years.

Should you have any questions regarding this conformity finding, please contact me at (608) 829-7518.

Sincerely yours,



Dwight E. McComb  
Systems Planning & Performance Engineer  
On Behalf of the U.S. Department of Transportation  
Federal Highway Administration  
Federal Transit Administration

cc: Aileen Switzer, WisDOT DTIM  
Sandra K. Beaupre, WisDOT, DTIM, BPED  
Patricia Trainer, WisDOT DTSD, BTS  
Sheri Schmit, WisDOT, SE Region  
Michael Leslie, USEPA  
Bart Sponseller, WDNR  
Christopher Bertch, FTA







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

MAY 15 2014

George Poirier  
Division Administrator  
Federal Highway Administration - Wisconsin Division  
525 Junction Road, Suite 8000  
Madison, Wisconsin 53717

REPLY TO THE ATTENTION OF

Dear Mr. Poirier:

The U.S. Environmental Protection Agency (EPA) has completed its review of the conformity determinations for the 2013-2016 Transportation Improvement Program (TIP) and 2035 Regional System Plan (Plan) for the Milwaukee metropolitan area. The TIP and Plan were prepared by the Southeastern Wisconsin Regional Planning Commission (SEWRPC). This letter provides the results of our review of the conformity determinations.

The Milwaukee metropolitan area is currently designated marginal nonattainment for the 2008 eight-hour ozone standard for a portion of Kenosha county, and maintenance for the 2006 fine particulates (PM<sub>2.5</sub>) 24 hour standard for Milwaukee, Racine, Waukesha counties. This area has Motor Vehicle Emissions Budgets (Budgets) for Direct PM<sub>2.5</sub> and Oxides of Nitrogen for 2020 and 2025 which is used for testing for the PM<sub>2.5</sub> standard. The 2008 marginal eight-hour ozone area has an established 2011 emissions level which is used for testing conformity.

EPA's MOVES2010b model generated emissions factors (EFs) which SEWRPC used for the regional analyses. These EFs were developed using the latest local transportation planning assumptions for this area. Emissions were calculated for the years 2015, 2020, 2025 and 2035. The Milwaukee metropolitan area demonstrated consistency with all applicable conformity tests for the 2008 eight-hour ozone standard, and the 2006 PM<sub>2.5</sub> 24 hour standard.

In summary, the SEWRPC TIP and the Plan conformity determinations for the Milwaukee metropolitan area meet the requirements of the conformity regulations. EPA recommends that these conformity determinations be approved. If you have any questions, feel free to contact Michael Leslie of my staff, at (312) 353-6680.

Sincerely yours,

A handwritten signature in cursive script that reads "Pamela Blakley".

Pamela Blakley  
Chief  
Control Strategies Section





May 23, 2014

Mr. John Mooney  
U.S. Environmental Protection Agency (EPA) - Region V  
77 West Jackson Boulevard  
Mail Code: AR-18J  
Chicago, IL 60604-3507

**SUBJECT:** Review of Southeastern Wisconsin Regional Planning Commission's Transportation Conformity Findings for Fiscally Constrained 2035 Regional Transportation Plan and 2013 – 2016 Transportation Improvement Program

Dear Mr. Mooney:

We are writing to acknowledge the Wisconsin Department of Natural Resources (WDNR) Bureau of Air Management's review of and approval of the Southeastern Wisconsin Regional Planning Commission's (SEWRPC) transportation conformity determination for the year 2035 Regional Transportation Plan (RTP) and the 2013 – 2016 Transportation Improvement Program (TIP). The TIP and the RTP are considered to be in conformity with the State of Wisconsin's maintenance plan for the 2006 24-hour PM<sub>2.5</sub> National Ambient Air Quality Standard (NAAQS). The TIP and RTP also conform to the 2011 baseline-year emission test for the 2008 8-hour ozone NAAQS.

The results of SEWRPC's analysis indicate that the RTP and TIP for the region achieve mobile source emissions below those allowed for in the state's approved maintenance plan for the three-county area of Milwaukee, Racine and Waukesha Counties. On April 22, 2014, the U.S. EPA approved the maintenance plan for the 2006 24-hour PM<sub>2.5</sub> NAAQS and determined that the motor vehicle budgets, derived using EPA's Motor Vehicle Emission Simulator (MOVES) model, were adequate for conformity purposes. SEWRPC incorporates a Vehicle Miles Traveled (VMT) growth rate of approximately 0.9% per year to the year 2015, 0.8% VMT growth from 2015 to 2025, and 0.5% VMT growth from 2025 to 2035. The growth rate represents the official anticipated intermediate economic and demographic growth forecasts for the region and the implementation of various public transit and other transportation control measure (TCM) activities. The maintenance plan for the 2006 24-hour PM<sub>2.5</sub> NAAQS for the three-county area incorporated the higher VMT growth rate of approximately 1.7 percent per year to the year 2010 to 2020, and 1.1 percent per year for 2020-2025, with 7.5 percent in additional emissions to account for uncertainty in transportation emission forecasts.

SEWRPC's analysis, applied to the 2035 RTP and 2013 – 2016 TIP, demonstrate that emissions remain within the mobile source emission budgets identified in the following table (Source: *Draft SEWRPC Assessment of Conformity of the Year 2035 Regional Transportation Plan and the Year 2013-2016 Transportation Improvement Program for the 2008 8-Hour Ozone and 2006 24-Hour Fine Particulate National Ambient Air Quality Standards*, p. 39):

**CONFORMITY TESTS OF THE FISCALLY CONSTRAINED YEAR 2035 REGIONAL TRANSPORTATION SYSTEM PLAN  
AND 2013-2016 TRANSPORTATION IMPROVEMENT PROGRAM**

Area	Conformity Analysis			Forecast Pollutant Emissions Tests (Tons)							
				Volatile Organic Compounds		Nitrogen Oxides		Fine Particulate		Sulfur Dioxide	
	Test	Year	Month	Test Value (Not to be Exceeded)	Forecast Emissions	Test Value (Not to be Exceeded)	Forecast Emissions	Test Value (Not to be Exceeded)	Forecast Emissions	Test Value (Not to be Exceeded)	Forecast Emissions
Three-County Fine Particulate Maintenance Area (2006 24-Hour Fine Particulate NAAQS) <sup>a</sup>	Budget Test <sup>c</sup>	2015	January	--	21.439	--	37.538	--	2.320	--	0.335
		2020	January	15.890	12.960	32.620	26.295	2.330	1.907	0.390	0.316
		2025	January	11.980	9.379	28.690	22.655	2.160	1.742	0.380	0.306
Wisconsin Portion of the Chicago-Naperville, IL-IN-WI Marginal Ozone Nonattainment Area (2008 Eight-Hour Ozone NAAQS) <sup>b</sup>	Build No Greater than Baseline 2011 Emissions (40 CFR 93.119)	2015	July	1.389	1.110	3.622	2.634	--	--	--	--
		2025	July	1.389	0.770	3.622	1.563	--	--	--	--
		2035	July	1.389	0.715	3.622	1.506	--	--	--	--

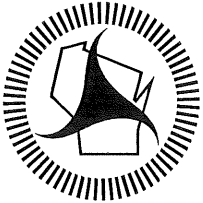
Source: SEWRPC and Wisconsin Department of Natural Resources.

We would like to indicate our appreciation for the considerable SEWRPC staff time, expertise and cooperation that were devoted to this effort. We also look forward to our continued collaboration with SEWRPC for the VISION 2050 long range transportation and land use planning effort. Should you have any questions or comments concerning our review and concurrence with the assessment of conformity document, please contact Mike Friedlander of my staff at (608) 267-0806 or [Michael.Friedlander@wisconsin.gov](mailto:Michael.Friedlander@wisconsin.gov).

Sincerely,

Bart Sponseller  
Director  
Bureau of Air Management

- cc: Mark J. Wolfgram/WisDOT  
Rebecca S. Burkel/WisDOT  
Pat Trainer/WisDOT  
Dwight E. McComb/FHWA  
Stewart McKenzie/FTA-Chicago  
Michael G. Leslie/USEPA-Region V  
Kenneth R. Yunker -SEWRPC



## Wisconsin Department of Transportation

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May 30, 2014

Mr. Dwight McComb  
Planning and Program Development Engineer  
Federal Highway Administration  
U.S. Department of Transportation  
525 Junction Road, Suite 8000  
Madison, Wisconsin 53717

**SUBJECT:** Review of Draft "Assessment of Conformity of the Year 2035 Regional Transportation Plan and the Year 2013-2016 Transportation Improvement Program for the 2008 Eight-Hour Ozone and 2006 24-Hour Fine Particulate National Ambient Air Quality Standards"

Dear Mr. McComb:

The Wisconsin Department of Transportation (WisDOT) appreciates the opportunity to review the Southeastern Wisconsin Regional Planning Commission's (SEWRPC) draft Assessment of Conformity of the Year 2035 referenced above.

WisDOT has completed its review of SEWRPC's Assessment of Conformity of the Year 2035 RTP and the 2013 – 2016 TIP. The RTP and TIP conformance pertain to the Wisconsin portion of the Chicago-Naperville, IL-IN-WI 2008 eight-hour marginal ozone nonattainment area consisting of Kenosha County east of IH 94, and the three county PM<sub>2.5</sub> maintenance area consisting of Milwaukee, Racine, and Waukesha counties.

WisDOT's review has focused on SEWRPC's demonstration that it had met the criteria and procedural requirements stipulated in the amended Transportation Conformity Rule (Restructuring Amendments) issued in the Federal Register, March 14, 2012, 40 CFR, Parts 51 and 93. SEWRPC's planning assumptions, its travel and emissions modeling assumptions have been derived in part through collaboration with the Department of Natural Resources (WDNR) and WisDOT. These are now applied to the year 2035 RTP and its implementing 2013 - 2016 TIP to demonstrate conformity.

With regard to the Wisconsin portion of the Chicago-Naperville, IL-IN-WI marginal nonattainment area, the forecast year emission estimates must be less than the baseline (year 2011) emissions estimated for NO<sub>x</sub> and VOC (40 CFR 93.119). The estimate of year 2011 emissions is based on traffic count data published annually by WisDOT. The VOC and NO<sub>x</sub> emissions forecasts (2015, 2025, and 2035) for the transportation system within the Kenosha county nonattainment area for the RTP and year 2013-2016 TIP are less than the estimated year 2011 emissions utilized in the build no greater than baseline emissions test.

As for the three county PM<sub>2.5</sub> nonattainment area, the forecast year emission estimates must be less than the transportation system emission budgets included in the recently EPA approved (April 22, 2014) three county 2006 24-hour PM<sub>2.5</sub> standard maintenance plan for PM<sub>2.5</sub>, NO<sub>x</sub>, SO<sub>2</sub> and VOC (40 CFR 93.118). The VOC, NO<sub>x</sub>, SO<sub>2</sub> and PM<sub>2.5</sub> emission forecasts (2015, 2020, 2025, and 2035) for the transportation system within the

three county PM<sub>2.5</sub> maintenance area under the RTP and year 2013-2016 TIP are less than the emission budgets for the maintenance plan.

Based on the results of these analyses, WisDOT concurs with SEWRPC's conclusion that the RTP and the 2013-2016 TIP are in conformance with the State of Wisconsin three county Maintenance Plan for the 2006 24-hour PM<sub>2.5</sub> standard and the 2011 Baseline year interim emission tests for the Kenosha county portion of the Chicago-Naperville, IL-IN-WI marginal ozone nonattainment area for the 2008 8-hour ozone standard.

Thank you for the opportunity to review the Assessment of Conformity. We recognize the many benefits associated with reduced emissions from all sectors. These are important benefits and goals that we continue to work towards. If you have any questions, please contact John Glaze of my staff at 608/264-9525.

Sincerely,



Rebecca Burkel, Director  
Bureau of Technical Services  
Division of Transportation System Development

CC: Christopher Hiebert, Southeastern Wisconsin Regional Planning Commission  
Bethaney Bacher-Gresock, FHWA – Wisconsin  
Michael Leslie, USEPA – Region V  
Bart Sponseller, DNR - Bureau of Air Management  
Aileen Switzer, WisDOT – Division of Transportation Investment Management  
Dan Grasser, WisDOT – Division of Transportation System Development  
Patricia Trainer, WisDOT – Bureau of Technical Services

jag

## Appendix D

### UPDATED ASSESSMENT OF CONFORMITY OF THE YEAR 2035 REGIONAL TRANSPORTATION PLAN AS AMENDED TO INCLUDE THE LAKEFRONT EXTENSION OF THE MILWAUKEE STREETCAR AND THE YEAR 2015-2018 TRANSPORTATION IMPROVEMENT PROGRAM FOR THE 24-HOUR FINE PARTICULATE NATIONAL AMBIENT AIR QUALITY STANDARD

The need to establish air quality conformity of the regional transportation plan and transportation improvement program is being triggered by the need amend the regional transportation system plan to include an extension of the Milwaukee Streetcar to the lakefront to serve a planned redevelopment of the property presently occupied by the Downtown Transit Center in the central business district of the City of Milwaukee.

This conformity assessment relies on the planning assumptions as documented in Commission Memorandum Report 217, [\*Assessment of Conformity of the Year 2035 Regional Transportation Plan and the Year 2013-2016 Transportation Improvement program for the 2008 Eight-Hour Ozone and 2006 24-Hour Fine Particulate National Ambient Air Quality Standards\*](#) (MR217) with the following exceptions. In addition to updated vehicle fleet age distributions, the revised assessment of conformity utilizes USEPA's October 2014 release of the MOVES2014 emissions model, incorporates the Commission's updated year 2050 population and employment forecasts, and includes an adjustment factor to reconcile differences between modeled and estimated actual average weekday vehicle miles of travel. In addition to the discussion below, Figure D-1 further details the assumptions utilized in this conformity assessment.

The updated population and employment estimates for the interim analysis years of 2015, 2020, and 2025 have been revised based on the population and employment estimates as documented in the 5<sup>th</sup> editions of Commission Technical Report 10, [\*The Economy of Southeastern Wisconsin\*](#) and Technical Report 11, [\*The Population of Southeastern Wisconsin\*](#). The updated demographic and employment estimates incorporate updated 2010 population and household estimates and employment levels. An updated copy of Table 4 from MR217 is provided as Table D-1.

As documented in Table 10 of Memorandum Report 215, [\*Review and Update of the Year 2035 Regional Transportation Plan\*](#), a comparison of model forecast year 2011 arterial average weekday vehicle miles of travel (VMT) to year 2011 estimated actual VMT indicated that the Commission model overstates VMT by approximately 6 percent or 2.6 million vehicle miles per average weekday. Adjustment factors were calculated to reduce the model projected regional arterial VMT by 2.6 million vehicle miles in each of the analysis years. Figure D-1 documents the adjustment factors utilized in this analysis.

Based on the assumptions discussed above, Tables D-2 and D-3, document the updated VMT estimates (Table 6 from MR217) and the revised conformity assessment (Table 8 from MR217) attendant to the amended regional transportation system plan and transportation improvement program (TIP) for the seven-county southeastern Wisconsin region and demonstrates that the regional transportation plan as amended to include the lakefront extension to the Milwaukee Streetcar and TIP continue to conform with the 2006 24-hour fine particulate standard (PM<sub>2.5</sub>) for the three-county Southeastern Wisconsin PM<sub>2.5</sub> maintenance area consisting of Milwaukee, Racine, and Waukesha Counties.

The U.S Department of Transportation determination of conformity and interagency concurrence letters with respect to this updated demonstration of conformity are included as Figures D-2 through D-5.

**Figure D-1**

**PROPOSED CONFORMITY ANALYSIS OF THE  
YEAR 2035 REGIONAL TRANSPORTATION PLAN AS AMENDED AND  
YEAR 2015-2018 TRANSPORTATION IMPROVEMENT PROGRAM**

- Years for Analysis [Years For Which Projection of Emissions Will Be Made For The Regional Transportation Improvement Program (TIP)/Transportation Plan (RTP)], Planning Assumptions and Forecasts, and Travel Simulation Models
  - Proposed years are 2015, 2020, 2025, and 2035. Year 2035 emission projections will be based on SEWRPC intermediate demographic and economic growth forecasts from year 2035 regional land use plan. Interim analysis years (2015, 2020, and 2025) based on the year 2050 intermediate demographic and economic growth forecasts as documented in the 5<sup>th</sup> editions of Commission technical reports 10 and 11
  - Emission projections will be based upon travel and traffic forecasts prepared from the Commission's current travel simulation models and adjusted to account for differences between model estimates and local traffic count based estimates of average weekday vehicle miles of travel (VMT). As documented in Commission Memorandum Report 215, average weekday model estimated year 2011 arterial VMT was approximately 2.6 million vehicle miles greater than estimates based on Wisconsin Department of Transportation traffic count data. A regional adjustment factor was developed to reduce model projected regional arterial VMT by 2.6 million vehicle miles in each of the analysis years. The adjustment factors are as follows:
    - 2015: 0.942
    - 2020: 0.945
    - 2025: 0.947
    - 2035: 0.951
- Emission Budget Tests for Conformity
  - Three-County 24-Hour Fine Particulate (PM<sub>2.5</sub>) maintenance area
    - MOVES2010a based budgets included in the 24-hour fine particulate redesignation request and maintenance plan submitted to US EPA in June of 2012
      - 2015, 2020, 2025, and 2035 TIP/RTP PM<sub>2.5</sub>, VOC, SO<sub>2</sub>, and NO<sub>x</sub> emission forecasts must not exceed the 2020 and 2025 PM<sub>2.5</sub>, VOC, and NO<sub>x</sub> Budgets
      - Emission estimates will be compared to the proposed PM<sub>2.5</sub>, NO<sub>x</sub>, SO<sub>2</sub>, and VOC budgets included in 24-hour fine particulate redesignation request and maintenance plan submitted to US EPA in June of 2012.
        - Fine Particulate (PM<sub>2.5</sub>)—2.33 tons for 2020 and 2.16 for 2025
        - Nitrogen Oxides (NO<sub>x</sub>)—32.62 tons for 2020 and 28.69 tons for 2025
        - Sulfur Dioxide (SO<sub>2</sub>)—0.39 tons for 2020 and 0.38 tons for 2025
        - Volatile Organic Compounds (VOC)—15.89 tons for 2020 and 11.98 tons for 2025



### Figure D-1 (continued)

- Emission model will be MOVES2014
  - National defaults will be used with the exception of the following localized input data:
    - Age Distribution (2015, 2020, 2025, 2035) to be provided by WDNR
    - Average Speed Distribution (2015, 2020, 2025, 2035) to be provided by SEWRPC
    - Fuels (2015, 2020, 2025, 2035) to be provided by WDNR
    - Inspection and Maintenance Program (2015, 2020, 2025, 2035) to be provided by WDNR
    - Meteorology (2015, 2020, 2025, 2035) to be provided by WDNR
    - Ramp (2015, 2020, 2025, 2035) to be provided by SEWRPC
    - Road Type (2015, 2020, 2025, 2035) to be provided by SEWRPC
    - Source Type Population (2015, 2020, 2025, 2035) to be provided by WDNR and updated by SEWRPC based on VMT Estimates
    - Vehicle Type VMT (2015, 2020, 2025, 2035) to be provided by WDNR and updated by SEWRPC based on VMT Estimates
    - Month VMT Fraction (2015, 2020, 2025, 2035) to be provided by WDNR
    - Day VMT Fraction (2015, 2020, 2025, 2035) to be provided by WDNR
    - Hour VMT Fraction (2015, 2020, 2025, 2035) to be provided by WDNR and Freeway Data updated by SEWRPC
  - SEWRPC will run the MOVES2014 model to develop emission estimates and will provide WDNR copies of the MOVES run specifications, input files, and MOVES outputs with the draft conformity demonstration.

#226936

Table D-1

**FORECAST POPULATION, HOUSEHOLD, AND EMPLOYMENT LEVELS  
FOR SOUTHEASTERN WISCONSIN: 2015, 2020, 2025, AND 2035**

Characteristics	Forecast Year			
	2015	2020	2025	2035
Southeastern Wisconsin				
Population	2,060,700	2,108,900	2,159,800	2,276,000
Households	820,200	844,000	868,800	925,800
Employment	1,202,900	1,229,200	1,255,500	1,368,100
Three County Area: Milwaukee, Racine, and Waukesha Counties				
Population	1,552,500	1,576,700	1,602,500	1,667,500
Households	622,300	635,400	648,800	685,600
Employment	948,500	964,400	980,200	1,069,100

Source: SEWRPC.

#226937

Table D-2

**AVERAGE WEEKDAY VEHICLE MILES OF TRAVEL WITHIN SOUTHEASTERN WISCONSIN: FORECAST YEAR 2015, 2020, 2025 and 2035<sup>a</sup>**

Facility Type	Speed Range	2015	2020	2025	2035
Standard Arterials Three-County Area	0 to 2.5	--	--	--	--
	2.5 to 7.5	--	--	--	--
	7.5 to 12.5	1,396	1,518	2,175	2,621
	12.5 to 17.5	15,095	14,411	13,736	17,901
	17.5 to 22.5	537,998	549,658	583,032	614,915
	22.5 to 27.5	3,880,874	3,975,666	4,077,574	4,374,950
	27.5 to 32.5	3,368,734	3,461,847	3,568,680	3,727,840
	32.5 to 37.5	3,364,488	3,472,088	3,543,505	3,700,943
	37.5 to 42.5	3,202,343	3,364,024	3,462,624	3,687,396
	42.5 to 47.5	872,714	923,980	963,787	1,041,478
	47.5 to 52.5	2,511,080	2,667,999	2,724,746	2,933,746
	52.5 to 57.5	--	--	--	--
	57.5 to 62.5	--	--	--	--
	62.5 to 67.5	--	--	--	--
	67.5 to 72.5	--	--	--	--
72.5+	--	--	--	--	
Subtotal	--	17,754,722	18,431,191	18,939,860	20,101,790
Freeways Three-County Area	0 to 2.5	--	--	--	--
	2.5 to 7.5	10,961	8,221	12,505	8,103
	7.5 to 12.5	8,571	8,116	6,495	5,118
	12.5 to 17.5	64,783	62,035	75,529	53,055
	17.5 to 22.5	298,130	352,677	332,978	326,542
	22.5 to 27.5	327,667	278,827	269,354	326,676
	27.5 to 32.5	275,933	271,806	283,440	370,527
	32.5 to 37.5	357,509	366,554	367,793	399,242
	37.5 to 42.5	338,054	351,410	363,601	402,878
	42.5 to 47.5	586,621	597,820	617,389	731,828
	47.5 to 52.5	1,705,633	1,658,259	1,708,753	1,902,080
	52.5 to 57.5	2,671,143	3,257,658	3,254,287	3,948,073
	57.5 to 62.5	1,118,944	1,114,292	1,230,652	1,353,109
	62.5 to 67.5	3,671,583	3,677,845	4,084,309	4,416,913
	67.5 to 72.5	--	--	--	--
72.5+	--	--	--	--	
Subtotal	--	11,435,532	12,005,520	12,607,085	14,244,143
Three-County Area Total		29,190,254	30,436,711	31,546,945	34,345,933

<sup>a</sup> The vehicle miles of travel set forth in this table represent arterial vehicle miles of travel only. Nonarterial vehicle miles of travel would increase the total average weekday vehicle miles of travel by approximately 10 percent.

Source: SEWRPC

#226939

Table D-3

**CONFORMITY TESTS OF THE FISCALLY CONSTRAINED YEAR 2035 REGIONAL TRANSPORTATION SYSTEM PLAN AS AMENDED  
AND 2015-2018 TRANSPORTATION IMPROVEMENT PROGRAM**

Area	Conformity Analysis			Forecast Pollutant Emissions Tests (Tons)							
				Volatile Organic Compounds		Nitrogen Oxides		Fine Particulate		Sulfur Dioxide	
	Test	Year	Month	Test Value (Not to be Exceeded)	Forecast Emissions	Test Value (Not to be Exceeded)	Forecast Emissions	Test Value (Not to be Exceeded)	Forecast Emissions	Test Value (Not to be Exceeded)	Forecast Emissions
Three-County Fine Particulate Maintenance Area (2006 24-Hour Fine Particulate NAAQS) <sup>a</sup>	Budget Test <sup>b</sup>	2015	January	--	24.360	--	41.524	--	1.981	--	0.314
		2020	January	15.890	15.519	32.620	22.115	2.330	1.229	0.390	0.120
		2025	January	11.980	11.492	28.690	14.130	2.160	0.829	0.380	0.110
		2035	January	11.980	8.759	28.690	8.548	2.160	0.568	0.380	0.103

Source: SEWRPC and Wisconsin Department of Natural Resources.

<sup>a</sup> Milwaukee, Racine, and Waukesha Counties.

<sup>b</sup> Year 2020 and 2025 budgets for Volatile Organic Compounds, Nitrogen Oxides, Fine Particulates, and Sulfur Dioxide are documented in the maintenance plan submitted by the Wisconsin Department of Natural Resources to USEPA on June 5, 2012. The maintenance plan has been approved by USEPA and the three-county area redesignated to attainment effective April 22, 2014.

#226940



**Federal Highway Administration**  
525 Junction Rd, Suite 8000  
Madison, WI 53717-2157

**Federal Transit Administration**  
200 W. Adams Street, Suite 320  
Chicago, IL 60606-5232

May 21, 2015

Mr. Kenneth R. Yunker, Executive Director  
Southeastern Wisconsin Regional Planning Commission  
W239 N1812 Rockwood Drive  
P.O. Box 1607  
Waukesha, WI 53187-1607

Dear Mr. Yunker:

The Federal Highway Administration and Federal Transit Administration jointly reviewed the Southeastern Wisconsin Regional Planning Commission's (SEWRPC) March 23 and 31, 2015 communications and documentation supporting a federal determination of transportation air quality conformity on the amended regional transportation plan and TIP. The plan amendment adds a project to extend the Milwaukee Streetcar system to the lakefront in downtown Milwaukee.

Principal documentation defining the recommended transportation system, the near term transportation improvement program, and assessment of their impacts on transportation conformity include:

- SEWRPC Planning Report No. 49, *A Regional Transportation System Plan for Southeastern Wisconsin: 2035*;
- SEWRPC Memorandum Report No. 215 *Review and Update of the Year 2035 Regional Transportation Plan (RTP)*;
- *A Transportation Improvement Program for Southeastern Wisconsin: 2015-2017* as amended (TIP);
- SEWRPC Memorandum Report No. 217 *Assessment of Conformity of the Year 2035 Regional Transportation Plan and the Year 2013-2016 Transportation Improvement Program for the 2008 Eight-Hour Ozone and 2006 24-Hour Fine Particulate (PM<sub>2.5</sub>) National Ambient Air Quality Standards*;
- 5<sup>th</sup> Edition, SEWRPC Technical Report 10, "The Economy of Southeastern Wisconsin;"
- 5<sup>th</sup> Edition, SEWRPC Technical Report 11, "The Population of Southeastern Wisconsin;" and
- Additional documentation supporting this determination:
  - SEWRPC Staff Memorandum, "Proposed Amendment to the Adopted Year 2035 Regional Transportation Plan," March 20, 2015;
  - SEWRPC Staff Memorandum, "Analysis of Fiscal Constraint of the Proposed Amendment to the Year 2035 Regional Transportation System Plan to Add the Lakefront Extension to the Milwaukee Streetcar System in Downtown

- Milwaukee,” transmitted May 19, 2015; and
- Attachments to SEWRPC Email, “Revised Assessment of Conformity of the Year 2035 Regional Transportation Plan as Amended and 2015-2018 Transportation Improvement Program for the 2006 24-Hour Fine Particulate Maintenance Area within Southeastern Wisconsin,” transmitted March 31, 2015, as follow:
    - Attachment 1, “Proposed Conformity Analysis of the Year 2035 Regional Transportation Plan as Amended and Year 2015-2018 Transportation Improvement Program;”
    - Attachment 2, “Forecast Population, Household, and Employment Levels for Southeastern Wisconsin: 2015, 2020, 2025, and 2035;”
    - Attachment 3, “Average Weekday Vehicle Miles of Travel Within Southeastern Wisconsin: Forecast Year 2015, 2020, 2025 and 2035;” and
    - Attachment 4, “Conformity Tests of the Fiscally Constrained Year 2035 Regional Transportation System Plan as Amended and 2015-2018 Transportation Improvement Program.”

The conformity demonstration relies and is based on the collective information in all of these documents as well as other documents referenced therein.

The RTP and TIP apply to the six-county southeastern Wisconsin metropolitan planning area consisting of Washington, Ozaukee, Waukesha, Milwaukee, Racine and Kenosha Counties. The conformity assessment and this determination pertain specifically to the 2006, 24-Hour Fine Particulate (PM<sub>2.5</sub>) National Ambient Air Quality Standards and the associated three-county maintenance area (Milwaukee, Waukesha, and Racine Counties).

FHWA and FTA find that the RTP and TIP meet the following requirements:

- The transportation system envisioned for horizon and analysis years is described, including identification of design concept, scope, and operating policies of regionally significant additions or modifications to the existing system sufficient to determine travel times, traffic volumes, transit ridership, and relationship with expected land use;
- Significant future transportation policies, requirements, services, and activities are described;
- Fiscal constraint is demonstrated consistent with federal metropolitan transportation planning requirements, policies and guidance;
- Latest planning assumptions are used, including:
  - Estimates of current and future population, employment, travel, and congestion, based on:
    - Updated year 2050 population and employment forecasts, and
    - Adjustment to reconcile differences between modeled and estimated actual average weekday vehicle miles of travel.
  - Changes in transit operating policies (including fares and service levels) and assumed transit ridership since the previous conformity determination;
  - Reasonable assumptions about transit service and increases in transit fares and road and bridge tolls over time;
  - Use of the latest existing information regarding the effectiveness of the TCMs and other implementation plan measures which have already been implemented; and

- Use of the latest emissions estimation model – MOVES 2014. October 2014 release.

Interagency consultation occurred among the USEPA, Wisconsin DNR, Wisconsin DOT, FHWA, FTA and SEWRPC based on March 23, 2015 and March 31, 2015 email correspondences from SEWRPC and a March 31, 2015 teleconference. Consultation included agreement on the latest planning assumptions, latest emissions model, and appropriate conformity tests and analysis years to be used in the regional emissions analysis as documented in the March 31, 2015 email and attachments. The USEPA, Wisconsin DNR and Wisconsin DOT all provided review and comments supporting approval of the SEWRPC conformity determination.

SEWRPC provided opportunity for public comment on the Milwaukee streetcar extension amendment and conformity assessment during a formal public comment period from March 23 – April 21, 2015.

There are no transportation control measures in approved Wisconsin air quality SIPs.

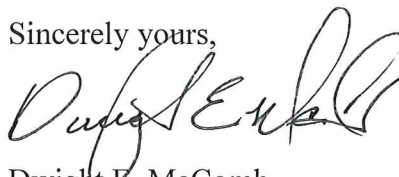
SEWRPC's regional emissions analysis demonstrates that implementation of the amended RTP and TIP will result in mobile source emissions within the motor vehicle emissions budget established in the Wisconsin maintenance plan for the 2006-24 hour PM<sub>2.5</sub> NAAQS.

Accordingly, FHWA and FTA jointly determine the SEWRPC RTP as amended and TIP to be in conformance with the transportation planning requirements of Titles 23 and 49 U.S.C., the CAAA, and related regulations as they pertain to the 2006-24 hour PM<sub>2.5</sub> NAAQS and associated Milwaukee-Waukesha-Racine counties maintenance area. This conformity determination does not include or alter the current ozone conformity determination impacting Eastern Kenosha County.

This conformity finding is valid for a period of four years. A new air quality conformity determination will be required if either the RTP or TIP is modified by adding, removing or changing the implementation schedule of a regionally significant or non-exempt project or if any other triggering events specified in 40 CFR 93.104 occur. Conformity can also lapse if the RTP or TIP is not updated within the required renewal period of four years.

Should you have any questions regarding this conformity finding, please contact me at (608) 829-7518.

Sincerely yours,



Dwight E. McComb  
Systems Planning & Performance Manager  
On Behalf of the U.S. Department of Transportation  
Federal Highway Administration  
Federal Transit Administration

ecc: Aileen Switzer, WisDOT DTIM  
Don Gutkowski, WisDOT, DTIM, BPED  
Patricia Trainer, WisDOT DTSD, BTS  
Sheri Schmit, WisDOT, SE Region  
Michael Leslie, USEPA  
Bart Sponseller, WDNR  
Christopher Bertch, FTA





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

---

MAY 21 2015

REPLY TO THE ATTENTION OF:

George Poirier  
Division Administrator  
Federal Highway Administration - Wisconsin Division  
525 Junction Road, Suite 8000  
Madison, Wisconsin 53717

Dear Mr. Poirier:

The U.S. Environmental Protection Agency (EPA) has completed its review of the conformity determinations for the amended 2015-2018 Transportation Improvement Program (TIP) and 2035 Regional System Plan (Plan) for the Milwaukee 2006 fine particulates (PM<sub>2.5</sub>) 24-hour standard area. The TIP and Plan were prepared by the Southeastern Wisconsin Regional Planning Commission (SEWRPC). This letter provides the results of our review of the conformity determinations.

Milwaukee metropolitan area is currently designated maintenance for the 2006 PM<sub>2.5</sub> 24-hour standard for Milwaukee, Racine, Waukesha counties. This area has Motor Vehicle Emissions Budgets for Direct PM<sub>2.5</sub> and Oxides of Nitrogen for 2020 and 2025 which are used for testing for the PM<sub>2.5</sub> standard.

EPA's MOVES2014 model generated emissions factors (EFs) which SEWRPC used for the regional analyses. These EFs were developed using the latest local transportation planning assumptions for this area. Emissions were calculated for the years 2015, 2020, 2025 and 2035. The Milwaukee metropolitan area demonstrated consistency with the 2006 PM<sub>2.5</sub> 24-hour standard.

In summary, the SEWRPC TIP and the Plan conformity determinations for the Milwaukee PM<sub>2.5</sub> area meet the requirements of the conformity regulations. EPA recommends that these conformity determinations be approved. If you have any questions, feel free to contact Michael Leslie of my staff, at (312) 353-6680.

Sincerely yours,

A handwritten signature in cursive script that reads "Pamela Blakley".

Pamela Blakley  
Chief  
Control Strategies Section





April 24, 2015

Mr. John Mooney  
U.S. Environmental Agency – Region V  
77 West Jackson Boulevard  
Mail Code: AR-18J  
Chicago, IL 60604-3507

**SUBJECT:** Review of Southeastern Wisconsin Regional Planning Commission's Transportation Conformity Findings for Fiscally Constrained 2035 Regional Transportation Plan and 2015-2018 Transportation Improvement Program

Dear Mr. Mooney:

This letter is to acknowledge the Wisconsin Department of Natural Resources (WDNR) Bureau of Air Management's review and approval of the Southeastern Wisconsin Regional Planning Commission's (SEWRPC) transportation conformity determination for the year 2035 Regional Transportation Plan (TRP) and the 2015-2018 Transportation Improvement Program (TIP).

The results of SEWRPC's analysis indicate that the RTP and TIP for the region achieve mobile source emissions below those allowed for the state's approved maintenance plan for the three county area of Milwaukee, Racine and Waukesha Counties. On April 22, 2014, EPA approved Wisconsin's maintenance plan for the 2006 24-hour PM<sub>2.5</sub> National Ambient Air Quality Standard (NAAQS) and determined that the motor vehicle budgets, derived using the Motor Vehicle Emission Simulator (MOVES) model, were adequate for conformity purposes.

SEWRPC incorporates a Vehicle Miles Travelled (VMT) growth rate of approximately 0.3 % from 2011-2015, a 4.3 % increase from 2015-2020, a 3.6 % increase from 2020-2025, and an 8.9 % increase from 2025-2035. The growth rate represents the official anticipated intermediate economic and demographic forecast for the region and the implementation of various public transit and other transportation control measure (TCM) activities. Wisconsin's maintenance plan for the 2006 24-hour PM<sub>2.5</sub> NAAQS for the three-county area incorporated the higher VMT growth rate of approximately 1.7% per year for 2010-2020 and 1.1% per year for 2020-2025, with an additional 7.5% safety margin to account for uncertainty in transportation emission forecasts.

SEWRPC's analysis, applied to the 2035 RTP and 2015-2018 TIP, rely on updated vehicle fleet age distributions, the EPA's October 2014 release of the MOVES2014 emissions model, SEWRPC's updated year 2050 population and employment forecasts, and includes an adjustment factor to reconcile differences between modeled and estimated actual average weekday vehicle miles of travel. SEWRPC's analysis demonstrate that emissions remain within the mobile source emission budgets identified in the following table (Source: Draft SEWRPC Assessment of Conformity of the Year 2035 Regional Transportation Plan and Year 2015-2018 Transportation Improvement Program for the 2006 24-Hour Fine Particulate National Ambient Air Quality Standards):


CONFORMITY TESTS OF THE FISCALLY CONSTRAINED YEAR 2035 REGIONAL TRANSPORTATION SYSTEM PLAN AND 2013-2016 TRANSPORTATION IMPROVEMENT PROGRAM

Area	Conformity Analysis			Forecast Pollutant Emissions Tests (Tons)							
				Volatile Organic Compounds		Nitrogen Oxides		Fine Particulate		Sulfur Dioxide	
	Test	Year	Month	Test Value (Not to be Exceeded)	Forecast Emissions	Test Value (Not to be Exceeded)	Forecast Emissions	Test Value (Not to be Exceeded)	Forecast Emissions	Test Value (Not to be Exceeded)	Forecast Emissions
Three-County Fine Particulate Maintenance Area (2006 24-Hour Fine Particulate NAAQS) <sup>2</sup>	Budget Test <sup>2</sup>	2015	January	--	21,439	--	37,538	--	2,320	--	0.335
		2020	January	15,890	12,960	32,620	26,295	2,330	1,907	0.390	0.316
		2025	January	11,980	9,379	28,690	22,655	2,160	1,742	0.380	0.306
		2035	January	11,980	7,922	28,690	21,386	2,160	1,686	0.380	0.311
Wisconsin Portion of the Chicago-Naperville, IL-IN-WI Marginal Ozone Nonattainment Area (2008 Eight-Hour Ozone NAAQS) <sup>2</sup>	Build No Greater than Baseline 2011 Emissions (40 CFR 93.119)	2015	July	1,389	1,110	3,622	2,634	--	--	--	--
		2025	July	1,389	0,770	3,622	1,563	--	--	--	--
		2035	July	1,389	0,715	3,622	1,506	--	--	--	--

Source: SEWRPC and Wisconsin Department of Natural Resources.

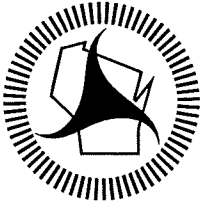
We appreciate the considerable SEWRPC staff time, expertise and cooperation that were devoted to this effort and look forward to our continued collaboration with SEWRPC for the VISION 2050 long range transportation and land use planning effort. Should you have any questions or comments concerning our review and concurrence with conformity documents, please contact Mike Friedlander of my staff at (608) 267-0806 or [Michael.Friedlander@wisconsin.gov](mailto:Michael.Friedlander@wisconsin.gov).

Sincerely,



Bart Sponseller  
 Deputy Division Administrator  
 Air, Waste and Remediation & Redevelopment Division

- cc: Aileen Switzer/WisDOT
- Rebecca Burkel/WisDOT
- Pat Trainer/WisDOT
- Dwight E. McComb/FHWA
- Stewart McKenzie/FTA-Chicago
- Michael G. Leslie/USEPA-Region V
- Kenneth R. Yunker/SEWRPC



## Wisconsin Department of Transportation

[www.dot.wisconsin.gov](http://www.dot.wisconsin.gov)

Scott Walker  
Governor

Mark Gottlieb  
Secretary

Division of Transportation  
System Development  
4802 Sheboygan Ave, Rm 451  
P O Box 7965  
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April 15, 2015

Mr. Dwight McComb  
Planning and Program Development Engineer  
Federal Highway Administration  
U.S. Department of Transportation  
525 Junction Road, Suite 8000  
Madison, Wisconsin 53717

**SUBJECT:** Review of Draft "Revised Assessment of Conformity of the Year 2035 Regional Transportation Plan as Amended and 2015-2018 Transportation Improvement Program for the 2006 24-Hour Fine Particulate Maintenance Area within Southeastern Wisconsin"

Dear Mr. McComb:

The Wisconsin Department of Transportation (WisDOT) appreciates the opportunity to review the Southeastern Wisconsin Regional Planning Commission's (SEWRPC) draft Assessment of Conformity of the Year 2035 referenced above.

WisDOT has completed its review of SEWRPC's revised Assessment of Conformity of the Year 2035 RTP and the amended 2015-2018 TIP. The RTP and TIP conformance pertain to the three county  $PM_{2.5}$  maintenance area consisting of Milwaukee, Racine, and Waukesha counties.

WisDOT's review has focused on SEWRPC's demonstration that it had met the criteria and procedural requirements stipulated in the amended Transportation Conformity Rule (Restructuring Amendments) issued in the Federal Register, March 14, 2012, 40 CFR, Parts 51 and 93. SEWRPC's updated planning assumptions, its travel and emissions modeling assumptions have been derived in part through collaboration with the Department of Natural Resources (WDNR) and WisDOT. These are now applied to the year 2035 RTP and its implementing 2015-2018 TIP to demonstrate conformity.

With regard to the three county  $PM_{2.5}$  nonattainment area, the forecast year emission estimates must be less than the transportation system emission budgets included in the EPA approved (April 22, 2014) three county 2006 24-hour  $PM_{2.5}$  standard maintenance plan for  $PM_{2.5}$ ,  $NO_x$ ,  $SO_2$  and VOC (40 CFR 93.118). The VOC,  $NO_x$ ,  $SO_2$  and  $PM_{2.5}$  emission forecasts (2015, 2020, 2025, and 2035) for the transportation system within the three county  $PM_{2.5}$  maintenance area under the RTP and year 2015-2018 TIP are less than the emission budgets for the maintenance plan.

Based on the results of these analyses, WisDOT concurs with SEWRPC's conclusion that the RTP and the 2015-2018 TIP are in conformance with the State of Wisconsin three county Maintenance Plan for the 2006 24-hour  $PM_{2.5}$  standard.

Thank you for the opportunity to review the Assessment of Conformity. We recognize the many benefits associated with reduced emissions from all sectors. These are important benefits and goals that we continue to work towards. If you have any questions, please contact John Glaze of my staff at 608/264-9525.

Sincerely,

 for:

Rebecca Burkel, Director  
Bureau of Technical Services  
Division of Transportation System Development

CC: Christopher Hiebert, Southeastern Wisconsin Regional Planning Commission  
Bethaney Bacher-Gresock, FHWA – Wisconsin  
Christopher Bertch, FTA – Region 5  
Michael Leslie, USEPA – Region V  
Bart Sponseller, DNR - Bureau of Air Management  
Aileen Switzer, WisDOT – Division of Transportation Investment Management  
Dan Grasser, WisDOT – Division of Transportation System Development  
Patricia Trainer, WisDOT – Bureau of Technical Services

jag

## Appendix E

### UPDATED ASSESSMENT OF CONFORMITY OF THE YEAR 2035 REGIONAL TRANSPORTATION PLAN AND AS AMENDED TO REFLECT THE RECOMMENDED ALTERNATIVE OF THE ENVIRONMENTAL IMPACT STUDY FOR THE RECONSTRUCTION OF IH 94 BETWEEN 70<sup>TH</sup> STREET AND 16<sup>TH</sup> STREET AND 2015-2018 TRANSPORTATION IMPROVEMENT PROGRAM WITH RESPECT TO THE 24-HOUR FINE PARTICULATE NATIONAL AMBIENT AIR QUALITY STANDARD

The Wisconsin Department of Transportation (WisDOT) has completed the preliminary engineering and environmental impact study for the reconstruction of the segment of IH 94 between 70<sup>th</sup> Street and 16<sup>th</sup> Street in Milwaukee County. WisDOT has requested that the year 2035 regional transportation plan be amended to reflect their recommended alternative, specifically that the plan include the conversion of the existing full IH 94 interchange at Hawley Road to a half interchange (retaining the on-ramp to westbound IH 94 and the off-ramp from eastbound IH 94) and the removal of the IH 94 interchange at General Mitchell Boulevard (with access to the Miller Park/C. Zablocki Veterans Affairs (VA) Medical Center being provided via new ramps at the Stadium Interchange and non-arterial roadways). As this proposed plan amendment is located within the three-county fine particulate (PM<sub>2.5</sub>) maintenance area, this proposed amendment to the regional transportation system plan is triggering the need to establish conformity of the plan and transportation improvement program with regard to PM<sub>2.5</sub> national ambient air quality standard (NAAQS).

This conformity assessment relies on the planning assumptions as documented in Commission Memorandum Report 217, [Assessment of Conformity of the Year 2035 Regional Transportation Plan and the Year 2013-2016 Transportation Improvement program for the 2008 Eight-Hour Ozone and 2006 24-Hour Fine Particulate National Ambient Air Quality Standards](#) (MR217) with the following exceptions. In addition to updated vehicle fleet age distributions, the revised assessment of conformity utilizes USEPA's October 2014 release of the MOVES2014 emissions model, incorporates the Commission's updated year 2050 population and employment forecasts, and includes an adjustment factor to reconcile differences between modeled and estimated actual average weekday vehicle miles of travel. In addition to the discussion below, Figure E-1 further details the assumptions utilized in this conformity assessment.

The updated population and employment estimates for the interim analysis years of 2015, 2020, and 2025 have been revised based on the population and employment estimates as documented in the 5<sup>th</sup> editions of Commission Technical Report 10, [The Economy of Southeastern Wisconsin](#) and Technical Report 11, [The Population of Southeastern Wisconsin](#). The updated demographic and employment estimates incorporate updated 2010 population and household estimates and employment levels. An updated copy of Table 4 from MR217 is provided as Table E-1.

As documented in Table 10 of Memorandum Report 215, [Review and Update of the Year 2035 Regional Transportation Plan](#), a comparison of model forecast year 2011 arterial average weekday vehicle miles of travel (VMT) to year 2011 estimated actual VMT indicated that the Commission model overstates VMT by approximately 6 percent or 2.6 million vehicle miles per average weekday. Adjustment factors were calculated to reduce the model projected regional arterial VMT by 2.6 million vehicle miles in each of the analysis years. Figure E-1 documents the adjustment factors utilized in this analysis.

Based on the assumptions discussed above, Tables E-2 and E-3, document the updated VMT estimates (Table 6 from MR217) and the revised conformity assessment (Table 8 from MR217) attendant to the amended regional transportation system plan and transportation improvement program (TIP) for the seven-county southeastern Wisconsin region and demonstrates that the regional transportation plan as amended to include the conversion of the existing full IH 94 interchange at Hawley Road to a half interchange

## Figure E-1

### PROPOSED CONFORMITY ANALYSIS OF THE YEAR 2035 REGIONAL TRANSPORTATION PLAN AS AMENDED AND YEAR 2015-2018 TRANSPORTATION IMPROVEMENT PROGRAM

- Years for Analysis [Years For Which Projection of Emissions Will Be Made For The Regional Transportation Improvement Program (TIP)/Transportation Plan (RTP)], Planning Assumptions and Forecasts, and Travel Simulation Models
  - Proposed years are 2015, 2020, 2025, and 2035. Year 2035 emission projections will be based on SEWRPC intermediate demographic and economic growth forecasts from year 2035 regional land use plan. Interim analysis years (2015, 2020, and 2025) based on the year 2050 intermediate demographic and economic growth forecasts as documented in the 5<sup>th</sup> editions of Commission technical reports 10 and 11
  - Emission projections will be based upon travel and traffic forecasts prepared from the Commission's current travel simulation models and adjusted to account for differences between model estimates and local traffic count based estimates of average weekday vehicle miles of travel (VMT). As documented in Commission Memorandum Report 215, average weekday model estimated year 2011 arterial VMT was approximately 2.6 million vehicle miles greater than estimates based on Wisconsin Department of Transportation traffic count data. A regional adjustment factor was developed to reduce model projected regional arterial VMT by 2.6 million vehicle miles in each of the analysis years. The adjustment factors are as follows:
    - 2015: 0.942
    - 2020: 0.945
    - 2025: 0.947
    - 2035: 0.951
- Emission Budget Tests for Conformity
  - Three-County 24-Hour Fine Particulate (PM<sub>2.5</sub>) maintenance area
    - MOVES2010a based budgets included in the 24-hour fine particulate redesignation request and maintenance plan submitted to US EPA in June of 2012
      - 2015, 2020, 2025, and 2035 TIP/RTP PM<sub>2.5</sub>, VOC, SO<sub>2</sub>, and NO<sub>x</sub> emission forecasts must not exceed the 2020 and 2025 PM<sub>2.5</sub>, VOC, and NO<sub>x</sub> Budgets
      - Emission estimates will be compared to the proposed PM<sub>2.5</sub>, NO<sub>x</sub>, SO<sub>2</sub>, and VOC budgets included in 24-hour fine particulate redesignation request and maintenance plan submitted to US EPA in June of 2012.
        - Fine Particulate (PM<sub>2.5</sub>)—2.33 tons for 2020 and 2.16 for 2025
        - Nitrogen Oxides (NO<sub>x</sub>)—32.62 tons for 2020 and 28.69 tons for 2025
        - Sulfur Dioxide (SO<sub>2</sub>)—0.39 tons for 2020 and 0.38 tons for 2025
        - Volatile Organic Compounds (VOC)—15.89 tons for 2020 and 11.98 tons for 2025



**Figure E-1 (continued)**

- Emission model will be MOVES2014
  - National defaults will be used with the exception of the following localized input data:
    - Age Distribution (2015, 2020, 2025, 2035) to be provided by WDNR
    - Average Speed Distribution (2015, 2020, 2025, 2035) to be provided by SEWRPC
    - Fuels (2015, 2020, 2025, 2035) to be provided by WDNR
    - Inspection and Maintenance Program (2015, 2020, 2025, 2035) to be provided by WDNR
    - Meteorology (2015, 2020, 2025, 2035) to be provided by WDNR
    - Ramp (2015, 2020, 2025, 2035) to be provided by SEWRPC
    - Road Type (2015, 2020, 2025, 2035) to be provided by SEWRPC
    - Source Type Population (2015, 2020, 2025, 2035) to be provided by WDNR and updated by SEWRPC based on VMT Estimates
    - Vehicle Type VMT (2015, 2020, 2025, 2035) to be provided by WDNR and updated by SEWRPC based on VMT Estimates
    - Month VMT Fraction (2015, 2020, 2025, 2035) to be provided by WDNR
    - Day VMT Fraction (2015, 2020, 2025, 2035) to be provided by WDNR
    - Hour VMT Fraction (2015, 2020, 2025, 2035) to be provided by WDNR and Freeway Data updated by SEWRPC
  - SEWRPC will run the MOVES2014 model to develop emission estimates and will provide WDNR copies of the MOVES run specifications, input files, and MOVES outputs with the draft conformity demonstration.

#228940

Table E-1

**FORECAST POPULATION, HOUSEHOLD, AND EMPLOYMENT LEVELS  
FOR SOUTHEASTERN WISCONSIN: 2015, 2020, 2025, AND 2035**

Characteristics	Forecast Year			
	2015	2020	2025	2035
Southeastern Wisconsin				
Population	2,060,700	2,108,900	2,159,800	2,276,000
Households	820,200	844,000	868,800	925,800
Employment	1,202,900	1,229,200	1,255,500	1,368,100
Three County Area: Milwaukee, Racine, and Waukesha Counties				
Population	1,552,500	1,576,700	1,602,500	1,667,500
Households	622,300	635,400	648,800	685,600
Employment	948,500	964,400	980,200	1,069,100

Source: SEWRPC.

#228941

Table E-2

**AVERAGE WEEKDAY VEHICLE MILES OF TRAVEL WITHIN SOUTHEASTERN WISCONSIN: FORECAST YEAR 2015, 2020, 2025 and 2035<sup>a</sup>**

Facility Type	Speed Range	2015	2020	2025	2035
Standard Arterials Three-County Area	0 to 2.5	--	--	--	--
	2.5 to 7.5	--	--	--	--
	7.5 to 12.5	1,396	1,518	2,057	2,422
	12.5 to 17.5	15,095	14,411	13,684	17,989
	17.5 to 22.5	537,998	549,658	580,760	617,868
	22.5 to 27.5	3,880,874	3,975,666	4,084,866	4,373,681
	27.5 to 32.5	3,368,734	3,461,847	3,569,460	3,727,717
	32.5 to 37.5	3,364,488	3,472,088	3,540,293	3,704,788
	37.5 to 42.5	3,202,343	3,364,024	3,461,404	3,688,565
	42.5 to 47.5	872,714	923,980	962,500	1,039,839
	47.5 to 52.5	2,511,080	2,667,999	2,731,170	2,935,089
	52.5 to 57.5	--	--	--	--
	57.5 to 62.5	--	--	--	--
	62.5 to 67.5	--	--	--	--
	67.5 to 72.5	--	--	--	--
72.5+	--	--	--	--	
Subtotal	--	17,754,722	18,431,191	18,946,194	20,107,960
Freeways Three-County Area	0 to 2.5	--	--	--	--
	2.5 to 7.5	10,961	8,221	13,456	8,163
	7.5 to 12.5	8,571	8,116	5,727	5,142
	12.5 to 17.5	64,783	62,035	62,858	54,643
	17.5 to 22.5	298,130	352,677	326,143	331,292
	22.5 to 27.5	327,667	278,827	286,357	311,359
	27.5 to 32.5	275,933	271,806	296,903	370,625
	32.5 to 37.5	357,509	366,554	364,831	405,072
	37.5 to 42.5	338,054	351,410	348,622	394,602
	42.5 to 47.5	586,621	597,820	615,368	735,241
	47.5 to 52.5	1,705,633	1,658,259	1,704,122	1,898,704
	52.5 to 57.5	2,671,143	3,257,658	3,267,011	3,954,023
	57.5 to 62.5	1,118,944	1,114,292	1,221,791	1,351,666
	62.5 to 67.5	3,671,583	3,677,845	4,090,288	4,418,395
	67.5 to 72.5	--	--	--	--
72.5+	--	--	--	--	
Subtotal	--	11,435,532	12,005,520	12,603,477	14,238,928
Three-County Area Total		29,190,254	30,436,711	31,549,671	34,346,887

<sup>a</sup> The vehicle miles of travel set forth in this table represent arterial vehicle miles of travel only. Nonarterial vehicle miles of travel would increase the total average weekday vehicle miles of travel by approximately 10 percent.

Source: SEWRPC

#226945

Table E-3

CONFORMITY TESTS OF THE FISCALLY CONSTRAINED YEAR 2035 REGIONAL TRANSPORTATION SYSTEM PLAN AS AMENDED  
AND 2015-2018 TRANSPORTATION IMPROVEMENT PROGRAM

Area	Conformity Analysis		Forecast Pollutant Emissions Tests (Tons)																													
			Volatile Organic Compounds			Nitrogen Oxides			Fine Particulate			Sulfur Dioxide																				
			Test Value	Forecast Emissions (Not to be Exceeded)	Forecast Emissions	Test Value	Forecast Emissions (Not to be Exceeded)	Forecast Emissions	Test Value	Forecast Emissions (Not to be Exceeded)	Forecast Emissions	Test Value	Forecast Emissions (Not to be Exceeded)	Forecast Emissions																		
Three-County Fine Particulate Maintenance Area (2006 24-Hour Fine Particulate NAAQS) <sup>a</sup>	Test	Year	Month	2015	2020	2025	2035	2015	2020	2025	2035	2015	2020	2025	2035	2015	2020	2025	2035													
	Budget Test <sup>b</sup>		January	24,360	15,519	11,492	8,759	41,524	22,115	14,128	8,547	--	32,620	28,690	28,690	--	2,330	2,160	2,160	1,981	1,229	0,829	0,568	--	0,390	0,380	0,380	--	0,314	0,120	0,110	0,103

Source: SEWRPC and Wisconsin Department of Natural Resources.

<sup>a</sup> Milwaukee, Racine, and Waukesha Counties.

<sup>b</sup> Year 2020 and 2025 budgets for Volatile Organic Compounds, Nitrogen Oxides, Fine Particulates, and Sulfur Dioxide are documented in the maintenance plan submitted by the Wisconsin Department of Natural Resources to USEPA on June 5, 2012. The maintenance plan has been approved by USEPA and the three-county area redesignated to attainment effective April 22, 2014.

#228943

(retaining the on-ramp to westbound IH 94 and the off-ramp from eastbound IH 94) and the removal of the IH 94 interchange at General Mitchell Boulevard (with access to the VA Medical Center being provided via new ramps at the Stadium Interchange and non-arterial roadways) and TIP continue to conform with the 2006 24-hour fine PM<sub>2.5</sub> NAAQS for the three-county Southeastern Wisconsin PM<sub>2.5</sub> maintenance area consisting of Milwaukee, Racine, and Waukesha Counties.

The U.S. Department of Transportation determination of conformity and interagency concurrence letters with respect to this updated demonstration of conformity are included as Figures E-2 through E-5.

#226942 v2

## Figure E-2



**Federal Highway Administration**  
525 Junction Rd, Suite 8000  
Madison, WI 53717-2157

**Federal Transit Administration**  
200 W. Adams Street, Suite 320  
Chicago, IL 60606-5232

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September 15, 2015

Mr. Kenneth R. Yunker, Executive Director  
Southeastern Wisconsin Regional Planning Commission  
W239 N1812 Rockwood Drive  
P.O. Box 1607  
Waukesha, WI 53187-1607

Dear Mr. Yunker:

The Federal Highway Administration and Federal Transit Administration jointly reviewed the Southeastern Wisconsin Regional Planning Commission's (SEWRPC) July 8, 2015 communication and documentation supporting a federal determination of transportation air quality conformity on the amended regional transportation plan and TIP. The plan amendment accounts for proposed changes in access at the current I-94 interchanges at Hawley Road and Mitchell Boulevard as part of the recommended alternative for the I-94 East-West Corridor Project (70<sup>th</sup> Street to 16<sup>th</sup> Street) in Milwaukee County.

Principal documentation defining the recommended transportation system, the near term transportation improvement program, and assessment of their impacts on transportation conformity include:

- SEWRPC Planning Report No. 49, A Regional Transportation System Plan for Southeastern Wisconsin: 2035;
- SEWRPC Memorandum Report No. 215 *Review and Update of the Year 2035 Regional Transportation Plan (RTP)*;
- *A Transportation Improvement Program for Southeastern Wisconsin: 2015-2017 as amended (TIP)*;
- SEWRPC Memorandum Report No. 217 *Assessment of Conformity of the Year 2035 Regional Transportation Plan and the Year 2013-2016 Transportation Improvement Program for the 2008 Eight-Hour Ozone and 2006 24-Hour Fine Particulate (PM<sub>2.5</sub>) National Ambient Air Quality Standards*;
- 5<sup>th</sup> Edition, SEWRPC Technical Report 10, "The Economy of Southeastern Wisconsin;"
- 5<sup>th</sup> Edition, SEWRPC Technical Report 11, "The Population of Southeastern Wisconsin;" and
- Additional documentation supporting this determination includes:
  - SEWRPC Staff Memorandum, "Proposed Amendment to the Adopted Year 2035 Regional Transportation Plan," August 6, 2015;
  - SEWRPC Staff Memorandum, "Updated Assessment of Conformity of the Year

2035 Regional Transportation Plan as Amended to Reflect the Recommended Alternative of the Environmental Impact Study for the Reconstruction of IH 94 Between 70<sup>th</sup> Street and 16<sup>th</sup> Street with Respect to the 24-Hour Fine Particulate National Ambient Air Quality Standard.”

The conformity demonstration relies and is based on the collective information in all of these documents as well as other documents referenced therein.

The RTP and TIP apply to the six-county southeastern Wisconsin metropolitan planning area consisting of Washington, Ozaukee, Waukesha, Milwaukee, Racine, and Kenosha Counties. The conformity assessment and this determination pertain specifically to the 2006, 24-Hour Fine Particulate (PM<sub>2.5</sub>) National Ambient Air Quality Standards and the associated three-county maintenance area (Milwaukee, Waukesha, and Racine Counties).

FHWA and FTA find that the RTP and TIP meet the following requirements:

- The transportation system envisioned for horizon and analysis years is described, including identification of design concept, scope, and operating policies of regionally significant additions or modifications to the existing system sufficient to determine travel times, traffic volumes, transit ridership, and relationship with expected land use;
- Significant future transportation policies, requirements, services, and activities are described;
- Fiscal constraint is demonstrated consistent with federal metropolitan transportation planning requirements, policies, and guidance;
- Latest planning assumptions are used, including:
  - Estimates of current and future population, employment, travel, and congestion, based on:
    - Updated year 2050 population and employment forecasts, and
    - Adjustment to reconcile differences between modeled and estimated actual average weekday vehicle miles of travel.
  - Changes in transit operating policies (including fares and service levels) and assumed transit ridership since the previous conformity determination;
  - Reasonable assumptions about transit service and increases in transit fares and road and bridge tolls over time;
  - Use of the latest existing information regarding the effectiveness of the TCMs and other implementation plan measures which have already been implemented; and
- Use of the latest emissions estimation model – MOVES 2014. October 2014 release.

Interagency consultation occurred among the USEPA, Wisconsin DNR, Wisconsin DOT, FHWA, FTA, and SEWRPC based on May 14, 2015, May 21, 2015, June 8, 2015, and July 8, 2015 email correspondences and discussion at the July 16, 2015 meeting of the Wisconsin Transportation Conformity Workgroup. Consultation included agreement on the latest planning assumptions, latest emissions model, and appropriate conformity tests and analysis years to be used in the regional emissions analysis as documented in SEWRPC’s July 8, 2015 email and attachments. The USEPA, Wisconsin DNR, and Wisconsin DOT all provided reviews and comments supporting approval of the SEWRPC conformity determination.

SEWRPC provided opportunity for public comment on the plan amendment and conformity assessment during a formal public comment period from July 8 through August 6, 2015. No comments were received.

There are no transportation control measures in approved Wisconsin air quality SIPs.

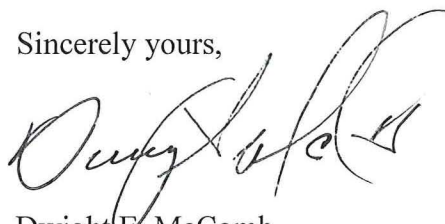
SEWRPC's regional emissions analysis demonstrates that implementation of the amended RTP and TIP will result in mobile source emissions within the motor vehicle emissions budget established in the Wisconsin maintenance plan for the 2006-24 hour PM<sub>2.5</sub> NAAQS.

Accordingly, FHWA and FTA jointly determine the SEWRPC RTP as amended and TIP to be in conformance with the transportation planning requirements of Titles 23 and 49 U.S.C., the CAAA, and related regulations as they pertain to the 2006-24 hour PM<sub>2.5</sub> NAAQS and associated Milwaukee-Waukesha-Racine counties maintenance area. This conformity determination does not include or alter the current ozone conformity determination impacting Eastern Kenosha County.

This conformity finding is valid for a period of four years. A new air quality conformity determination will be required if either the RTP or TIP is modified by adding, removing, or changing the implementation schedule of a regionally significant or non-exempt project or if any other triggering events specified in 40 CFR 93.104 occur. Conformity can also lapse if the RTP or TIP is not updated within the required renewal period of four years.

Should you have any questions regarding this conformity finding, please contact me at (608) 829-7518.

Sincerely yours,



Dwight E. McComb  
Systems Planning & Performance Manager  
On Behalf of the U.S. Department of Transportation  
Federal Highway Administration  
Federal Transit Administration

ecc: Aileen Switzer, WisDOT, DTIM  
Donna Brown-Martin, WisDOT, DTIM, BPED  
Patricia Trainer, WisDOT, DTSD, BTS  
Tony Barth, WisDOT, SE Region  
Michael Leslie, USEPA  
Bart Sponseller, WDNR  
Christopher Bertch, FTA



Figure E-3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 09 2015

REPLY TO THE ATTENTION OF:

---

George Poirier  
Division Administrator  
Federal Highway Administration - Wisconsin Division  
525 Junction Road, Suite 8000  
Madison, Wisconsin 53717

Dear Mr. Poirier:

The U.S. Environmental Protection Agency (EPA) has completed its review of the conformity determinations for the amended 2015-2018 Transportation Improvement Program (TIP) and 2035 Regional System Plan (Plan) for the Milwaukee 2006 fine particulates (PM<sub>2.5</sub>) 24-hour standard area. The TIP and Plan were prepared by the Southeastern Wisconsin Regional Planning Commission (SEWRPC). This letter provides the results of our review of the conformity determinations.

Milwaukee metropolitan area is currently designated maintenance for the 2006 PM<sub>2.5</sub> 24 hour standard for Milwaukee, Racine, Waukesha counties. This area has Motor Vehicle Emissions Budgets (Budgets) for Direct PM<sub>2.5</sub> and Oxides of Nitrogen for 2020 and 2025 which is used for testing for the PM<sub>2.5</sub> standard.

EPA's MOVES2014 model generated emissions factors (EFs) which SEWRPC used for the regional analyses. These EFs were developed using the latest local transportation planning assumptions for this area. Emissions were calculated for the years 2015, 2020, 2025 and 2035. The Milwaukee metropolitan area demonstrated consistency with the 2006 PM<sub>2.5</sub> 24-hour standard.

In summary, the SEWRPC TIP and the Plan conformity determinations for the Milwaukee PM<sub>2.5</sub> area meet the requirements of the conformity regulations. EPA recommends that these conformity determinations be approved. If you have any questions, feel free to contact Michael Leslie of my staff, at (312) 353-6680.

Sincerely yours,

A handwritten signature in cursive script that reads "Pamela Blakley".

Pamela Blakley  
Chief  
Control Strategies Section

**Figure E-3 (continued)**

-2-

cc: Mike Friedlander  
Bureau of Air Management  
Wisconsin Department of Natural Resources

Dwight McComb  
Federal Highway Administration  
Wisconsin Division

Figure E-4

State of Wisconsin  
DEPARTMENT OF NATURAL RESOURCES

Scott Walker, Governor  
Cathy Stepp, Secretary  
Telephone 608-266-2621  
Toll Free 1-888-936-7463  
TTY Access via relay - 711



August 10, 2015

Mr. John Mooney  
U.S. Environmental Agency – Region V  
77 West Jackson Boulevard  
Mail Code: AR-18J  
Chicago, IL 60604-3507

SUBJECT: Review of Southeastern Wisconsin Regional Planning Commission’s Transportation Conformity Findings for Fiscally Constrained 2035 Regional Transportation Plan and 2015-2018 Transportation Improvement Program

Dear Mr. Mooney:

This letter is to acknowledge the Wisconsin Department of Natural Resources (WDNR) Bureau of Air Management’s review and approval of the Southeastern Wisconsin Regional Planning Commission’s (SEWRPC) transportation conformity determination for the year 2035 Regional Transportation Plan (TRP) and the 2015-2018 Transportation Improvement Program (TIP).

The results of SEWRPC’s analysis indicate that the RTP and TIP for the region achieve mobile source emissions below those allowed for the state’s approved maintenance plan for the three county area of Milwaukee, Racine and Waukesha Counties. On April 22, 2014, EPA approved the maintenance plan for the 2006 24 –hour PM<sub>2.5</sub> NAAQS and determined that the motor vehicle budgets, derived using the Motor Vehicle Emission Simulator (MOVES) model, were adequate for conformity purposes. SEWRPC incorporates a Vehicle Miles Travelled (VMT) growth rate of approximately 0.3 % increase from 2011 -2015, a 4.3 % increase from 2015-2020, a 3.6 % increase from 2020-2025 and a 8.9 % increase from 2025 to 2035. The growth rate represents the official anticipated intermediate economic and demographic forecast for the region and the implementation of various public transit and other transportation control measure (TCM) activities. The maintenance plan for the 2006 24 –hour PM<sub>2.5</sub> NAAQS for the three-county area incorporated the higher VMT growth rate of approximately 1.7% per year for the year 2010 to 2020, and 1.1% per year for 2020-2025, with 7.5% in additional emissions to account for uncertainty in transportation emission forecasts.

SEWRPC’s analysis, applied to the 2035 RTP and 2015-2018 TIP, rely on updated vehicle fleet age distributions, the USEPA’s MOVES2014 emissions model, SEWRPC’s updated year 2050 population and employment forecasts, and includes an adjustment factor to reconcile differences between modeled and estimated actual average weekday vehicle miles of travel. SEWRPC’s analysis demonstrate that emissions remain within the mobile source emission budgets identified in the following table (Source: Draft SEWRPC Assessment of Conformity of the Year 2035 Regional Transportation Plan and Year 2015-2018 Transportation Improvement Program for the 2006 24-Hour Fine Particulate National Ambient Air Quality Standards):

CONFORMITY TESTS OF THE FISCALLY CONSTRAINED YEAR 2035 REGIONAL TRANSPORTATION SYSTEM PLAN AND 2013-2016 TRANSPORTATION IMPROVEMENT PROGRAM

Area	Conformity Analysis		Forecast Pollutant Emissions Tests (Tons)								
			Volatile Organic Compounds		Nitrogen Oxides		Fine Particulate		Sulfur Dioxide		
			Test Value (Not to be Exceeded)	Forecast Emissions	Test Value (Not to be Exceeded)	Forecast Emissions	Test Value (Not to be Exceeded)	Forecast Emissions	Test Value (Not to be Exceeded)	Forecast Emissions	
Three-County Fine Particulate Maintenance Area (2006 24-Hour Fine Particulate NAAQS) <sup>1</sup>	Budget Test <sup>2</sup>	2015	January	--	21,439	--	37,538	--	2,320	--	0.335
		2020	January	15,890	12,960	32,620	26,295	2,330	1,907	0.390	0.316
		2025	January	11,980	9,379	28,690	22,655	2,160	1,742	0.380	0.306
		2035	January	11,980	7,922	28,690	21,386	2,160	1,686	0.380	0.311
Wisconsin Portion of the Chicago-Naperville, IL-IN-WI Marginal Ozone Nonattainment Area (2008 Eight-Hour Ozone NAAQS) <sup>3</sup>	Build No Greater than Baseline 2011 Emissions (40 CFR 93.119)	2015	July	1,389	1,110	3,622	2,634	--	--	--	--
		2025	July	1,389	0,770	3,622	1,563	--	--	--	--
		2035	July	1,389	0,715	3,622	1,506	--	--	--	--

Source: SEWRPC and Wisconsin Department of Natural Resources.

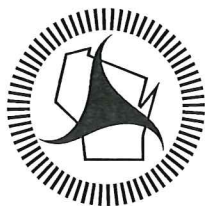
We appreciate the considerable SEWRPC staff time, expertise and cooperation that were devoted to this effort and look forward to our continued collaboration with SEWRPC for the VISION 2050 long range transportation and land use planning effort. Should you have any questions or comments concerning our review and concurrence with the assessment of conformity documents, please contact Mike Friedlander of my staff at (608) 267-0806 or [Michael.Friedlander@wisconsin.gov](mailto:Michael.Friedlander@wisconsin.gov).

Sincerely,



Bart Sponseller  
Deputy Division Administrator  
Environmental Management Division

cc: Aileen Switzer/WisDOT  
Rebecca Burkel/WisDOT  
Pat Trainer/WisDOT  
Dwight E. McComb/FHWA  
Christopher Bertch/FTA-Chicago  
Michael G. Leslie/USEPA-Region V  
Kenneth R. Yunker/SEWRPC



## Wisconsin Department of Transportation

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July 17, 2015

Mr. Dwight McComb  
Planning and Program Development Engineer  
Federal Highway Administration  
U.S. Department of Transportation  
525 Junction Road, Suite 8000  
Madison, Wisconsin 53717

**SUBJECT:** Review of Draft "Determination of Conformity of the Year 2035 Regional Transportation Plan as Amended and 2015-2018 Transportation Improvement Program for the 2006 24-Hour Fine Particulate Maintenance Area within Southeastern Wisconsin"

Dear Mr. McComb:

The Wisconsin Department of Transportation (WisDOT) appreciates the opportunity to review the Southeastern Wisconsin Regional Planning Commission's (SEWRPC) draft Determination (Assessment) of Conformity of the Year 2035 referenced above.

WisDOT has completed its review of SEWRPC's draft Assessment of Conformity of the Year 2035 RTP as amended and the 2015–2018 TIP. The RTP and TIP conformance pertain to the three county PM<sub>2.5</sub> maintenance area consisting of Milwaukee, Racine, and Waukesha counties.

WisDOT's review has focused on SEWRPC's demonstration that it had met the criteria and procedural requirements stipulated in the amended Transportation Conformity Rule (Restructuring Amendments) issued in the Federal Register, March 14, 2012, 40 CFR, Parts 51 and 93. SEWRPC's updated planning assumptions, its travel and emissions modeling assumptions have been derived in part through collaboration with the Department of Natural Resources (WDNR) and WisDOT. These are now applied to the year 2035 RTP and its implementing 2015-2018 TIP to demonstrate conformity.

With regard to the three county PM<sub>2.5</sub> nonattainment area, the forecast year emission estimates must be less than the transportation system emission budgets included in the EPA approved (April 22, 2014) three county 2006 24-hour PM<sub>2.5</sub> standard maintenance plan for PM<sub>2.5</sub>, NO<sub>x</sub>, SO<sub>2</sub> and VOC (40 CFR 93.118). The VOC, NO<sub>x</sub>, SO<sub>2</sub> and PM<sub>2.5</sub> emission forecasts (2015, 2020, 2025, and 2035) for the transportation system within the three county PM<sub>2.5</sub> maintenance area under the RTP and year 2015-2018 TIP are less than the emission budgets for the maintenance plan.

Based on the results of these analyses, WisDOT concurs with SEWRPC's conclusion that the RTP and the 2015-2018 TIP are in conformance with the State of Wisconsin three county Maintenance Plan for the 2006 24-hour PM<sub>2.5</sub> standard.

**Figure E-5 (continued)**

Thank you for the opportunity to review the Assessment of Conformity. We recognize the many benefits associated with reduced emissions from all sectors. These are important benefits and goals that we continue to work towards. If you have any questions, please contact John Glaze of my staff at 608/264-9525.

Sincerely,



Rebecca Burkel, Director  
Bureau of Technical Services  
Division of Transportation System Development

CC: Christopher Hiebert, Southeastern Wisconsin Regional Planning Commission  
Bethaney Bacher-Gresock, FHWA – Wisconsin  
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