Air Quality Memorandum

REPORT NO. 23

DATE February 8, 2008

SUBJECT <u>DRAFT</u> - CONFORMITY ANALYSIS FOR THE WFRC AMENDED 2030 REGIONAL TRANSPORTATION PLAN

ABSTRACT The Safe, Accountable, Flexible, Efficient Transportation Equity Act – A Legacy for Users (SAFTEA-LU) and the Clean Air Act Amendments (CAAA) require that all regionally significant highway and transit projects in air quality non-attainment and maintenance areas be derived from a "conforming" Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP). A conforming Plan or Program is one that has been analyzed for emissions of controlled air pollutants and found to be within emission limits established in the State Implementation Plan (SIP). This conformity analysis is made by the Wasatch Front Regional Council (WFRC), as the Metropolitan Planning Organization for the region, and submitted to the Federal Highway Administration and the Federal Transit Administration for their concurrence. This conformity analysis is being prepared under the final conformity regulations issued jointly by the EPA and USDOT on November 24, 1993, and the March 2006 Final Rule.

This document analyzes the air quality impacts of some amendments to the WFRC 2030 RTP which was found to meet air quality conformity requirements as stated in a letter from FHWA and FTA dated September 30, 2007. Included in this document are an updated conformity determination and a description of the changes to the travel model and the transportation network since the previous conformity determination. For complete documentation of the previous conformity analysis, the methods and procedures of which still apply to this update, please refer to Air Quality Memorandum 21, June 18, 2007.

Based on the analysis presented in this document, the Amended WFRC 2030 RTP conforms to the State Implementation Plan for all pollutants in applicable nonattainment or maintenance areas. Therefore, all the transportation projects in Weber, Davis, and Salt Lake Counties included in the Amended 2030 RTP are found to conform.

Wasatch Front Regional Council

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A. Amendments to the RTP

Listed below are the projects that have been proposed to be added to the RTP since it was approved by the Regional Council in May 2007 and found to conform by Federal Highway Administration and Federal Transit Administration in September 2007.

- 1. Upgrade three existing intersections on Bangerter Highway in Salt Lake County to grade separated interchanges in Phase 1. The proposed interchanges are located at 6200 South, 7800 South, and 600 West. The travel model capacity of Bangerter Highway was not changed as a result of this project since most of Bangerter Highway still operates with signalized at-grade intersections.
- 2. Move the Phase 2 interchange on Bangerter Highway at Redwood Road to Phase 1.
- 3. Move the Phase 2 railroad structure project at 14600 South to Phase 1.
- 4. Add a fixed guideway transit corridor on 5600 West from I-80 on the north and eventually connecting with the Mid Jordan LRT line (already included in the plan) on the south. The transit corridor on 5600 West was modeled as bus rapid transit (BRT), but the technology for the corridor is yet to be determined and could be either bus rapid transit, streetcar, or light rail.

B. Transportation Modeling

Shown in Table 1 is a summary of the speeds and vehicle miles traveled for the horizon years 2015, 2025, and 2030 in Salt Lake City, Ogden City, and Salt Lake County for the Amended RTP.

Travel Characteristics						
		Base Year Horizon Year				
		2004	2006	2015	2025	2030
		Salt La	ake City			
HPMS Weekday VMT						
Freeway		2,315,788	2,508,082	2,573,109	2,902,492	3,210,799
Ramp		77,280	84,551	79,419	90,370	97,067
Arterial & Collector		2,719,261	2,700,463	2,956,047	3,147,247	3,150,159
Local		952,295	949,510	1,027,742	1,135,763	1,168,750
Total		6,064,623	6,242,607	6,636,317	7,275,873	7,626,775
Average Speed						
Freeway - daily		61.6	61.6	60.0	59.1	58.4
Freeway - PM peak		55.9	55.9	52.2	50.8	49.4
Arterial - daily		29.1	29.1	26.5	26.1	25.6
Arterial - PM peak		26.2	26.2	22.9	21.7	21.6
		Ogde	en City			
HPMS Weekday VMT	(1990)					
Freeway	79,724	134,782	128,266	128,504	146,295	146,502
Ramp	8,070	11,016	12,232	13,149	15,387	14,933
Arterial & Collector	773,181	940,504	992,859	1,071,071	1,215,259	1,219,547
Local	246,169	374,869	408,243	418,757	473,361	414,773
Total	1,107,144	1,461,171	1,541,600	1,631,480	1,850,301	1,795,755
Average Speed						
Freeway - daily	64.3	59.2	59.2	66.5	65.9	66.5
Freeway - PM peak	63.3	50.2	50.2	65.6	63.9	65.4
Arterial - daily	33.6	34.2	34.2	33.6	33.1	33.4
Arterial - PM peak	30.8	31.5	31.5	30.4	29.5	30.1
		Salt Lak	ke County			
HPMS Weekday VMT						
Freeway		8,902,999	9,810,788	12,424,840	15,757,990	17,203,747
Ramp		340,293	349,741	454,453	546,839	586,855
Arterial & Collector		11,302,074	11,476,734	13,541,949	14,733,721	15,407,626
Local		3,884,629	3,966,892	4,815,356	5,690,521	5,839,338
Total		24,429,995	25,604,155	31,236,598	36,729,071	39,037,567
Average Speed						
Freeway - daily		62.0	62.0	58.5	58.2	58.0
Freeway - PM peak		55.9	55.9	49.1	48.9	48.8
Arterial - daily		31.6	31.6	29.5	29.0	29.1
Arterial - PM peak		27.9	27.9	24.6	24.1	24.4

Table 1 Travel Characteristics

C. Conformity Determination

The following conformity findings for the Amended 2030 Regional Transportation Plan for the Wasatch Front are based on the transportation systems and planning assumptions described in this report and the latest vehicle emissions model approved by EPA (Mobile6.2).

Salt Lake City CO Conformity

The carbon monoxide maintenance plan for Salt Lake City was approved by EPA effective September 30, 2005 as recorded in the Federal Register (Vol. 70, No. 146, August 1, 2005). The maintenance plan defines a motor vehicle emission budget for the years 2005 and 2019 of 278.62 tons/day. Table 2 below demonstrates that projected mobile source emissions are within the emission budget defined in the maintenance plan for the 2019 budget year. The other years listed in Table 8 are in accordance with requirements of the Conformity Rule (40 CFR Part 93) as noted in the table.

From this demonstration it is concluded that the Amended RTP conforms to the applicable controls and goals of the State Implementation Plan (Maintenance Plan) for Carbon Monoxide in Salt Lake City.

Table 2				
Salt Lake City CO				
Conformity Determination				

	b	а	b	С
Year	2012	2019	2025	2030
Budget (tons/day)	278.62	278.62	278.62	278.62
emission rate (grams/mile)	14.33	11.39	10.63	10.42
seasonal VMT	6,811,664	6,746,566	7,123,027	7,469,459
Projection* (tons/day)	107.65	84.74	83.51	85.85
Conformity (Projection < Budget?)	Pass	Pass	Pass	Pass

a- budget year, b - 10-year rule, c - last year of Plan, d - no budget 5-year rule

* Projection = Emission Rate x seasonal VMT, then divide by 453.5 to convert to pounds, then divide by 2,000 to convert to tons.

Ogden CO Conformity

The carbon monoxide maintenance plan for Ogden City was approved by EPA effective November 14, 2005 as recorded in the Federal Register (Vol. 70, No. 177, September 14, 2005). The maintenance plan defines a motor vehicle emission budget for the years 2005 and 2021 of 75.36 and 73.02 tons/day respectively. Table 3 below demonstrates that projected mobile source emissions are within the emission budget defined in the maintenance plan for the 2021 budget year. The other years listed in Table 3 are in accordance with requirements of the Conformity Rule (40 CFR Part 93) as noted in the table.

From this demonstration it is concluded that the Amended RTP conforms to the applicable controls and goals of the State Implementation Plan (Maintenance Plan) for Carbon Monoxide in Ogden City.

	b	а	b	С
Year	2012	2021	2025	2030
Budget (tons/day)	75.36	73.02	73.02	73.02
emission rate (grams/mile)	16.62	12.64	12.12	11.77
seasonal VMT	1,644,076	1,710,803	1,795,744	1,742,729
Projection* (tons/day)	30.13	23.85	24.00	22.61
Conformity (Projection < Budget?)	Pass	Pass	Pass	Pass

Table 3 Ogden City CO Conformity Determination

a- budget year, b - 10-year rule, c - last year of Plan, d - no budget 5-year rule

* Projection = Emission Rate x seasonal VMT, then divide by 453.5 to convert to pounds, then divide by 2,000 to convert to tons.

Ogden PM10 Conformity

Ogden City was designated a PM_{10} non-attainment area in August of 1995 based on PM_{10} violations in 1993 or earlier. Since a PM_{10} SIP for Ogden has not yet been approved by EPA, it must be demonstrated that Ogden PM_{10} emissions are either less than 1990 emissions or less than "no-build" emissions. The analysis years 2012, 2015, 2025, and 2030 were selected in accordance with the requirements of 40 CFR Section 93.119(e).

 PM_{10} emissions are present in two varieties referred to as primary and secondary PM_{10} . Primary PM_{10} consists mostly of fugitive road dust but also includes particles from brake wear and tire wear and some "soot" particles emitted directly from the vehicle tailpipe. Secondary PM_{10} consists of gaseous tailpipe emissions that later take on a particulate form through subsequent chemical reactions in the atmosphere. Nitrogen oxides are the main component of secondary PM_{10} emissions with sulfur oxides a distant second.

As summarized in Tables 4a and 4b, emission estimates for the 2030 RTP satisfy the "Build < 1990" test for primary PM_{10} (direct tailpipe particulates and road dust) in Ogden City. The 1990 emission estimates used in the 2003 conformity analysis are used again for this conformity analysis, specifically 4.57 tons/day for the NOx precursor budget, and 2.28 tons/day for the direct PM10 budget. The 1990 primary PM₁₀ estimate for Ogden City includes emissions from the unpaved access road to the Ogden landfill which was closed in 1998.

For projections of primary PM_{10} emissions, no credit was taken for a number of programs adopted since Ogden City last violated the PM_{10} standard. These particulate reducing programs include covered load ordinances, increased frequency of street sweeping, and reduced application of deicing and skid resistant materials (salt and sand). Documentation of these programs has been provided by Ogden City but the actual benefits of these programs are not included in the emission projections below. Other areas that have estimated the benefit of these programs have found a silt load reduction of over 30% for effective street sweeping programs and a 5% silt load reduction when limiting the amount of sand and salt applied to the roads. Ogden City has also implemented a number of specific projects that have a positive effect in reducing particulate emissions including park and ride lots, storm water improvements, shoulder widening and edge striping, and addition of curb and gutter on several projects. From this demonstration it is concluded that the RTP conforms under the Emission Reductions Criteria for areas without motor vehicle emissions budgets for PM_{10} in Ogden City.

Table 4a

Ogden City PM₁₀ - NOx Precursor Conformity Determination

d	b	b	С
2012	2015	2025	2030
4.57	4.57	4.57	4.57
1.20	0.89	0.44	0.38
1,644,076	1,583,391	1,795,744	1,742,729
2.18	1.55	0.86	0.72
Pass	Pass	Pass	Pass
	4.57 1.20 1,644,076 2.18	4.57 4.57 1.20 0.89 1,644,076 1,583,391 2.18 1.55	4.574.574.571.200.890.441,644,0761,583,3911,795,7442.181.550.86

a- budget year, b - 10-year rule, c - last year of Plan, d - no budget 5-year rule

* Projection = Emission Rate x seasonal VMT, divide by 453.5 to convert to pounds, divide by 2,000 to convert to tons.

* Projection = Emission Rate x seasonal VMT, divide by 453.5 to convert to pounds, divide by 2,000 to convert to tons.

Table 4b

Ogden City PM₁₀ - Primary Particulates** Conformity Determination

	d	b	b	С
Year	2012	2015	2025	2030
Budget-1990 (tons/day)	2.28	2.28	2.28	2.28
tailpipe particulate rates (grams/mile)				
Gpm (gasoline particulates)	0.0044	0.0041	0.0038	0.0037
Ec (diesel elemental carbon)	0.0049	0.0027	0.0008	0.0006
Oc (diesel organic carbon)	0.0025	0.0014	0.0004	0.0003
Pbr (brake particulates)	0.0125	0.0125	0.0125	0.0125
Pti (tire wear particulates)	0.0091	0.0091	0.0091	0.0091
road dust particulate rates (grams/mile)				
Freeway road dust	0.5400	0.5400	0.5400	0.5400
Ramp Road dust	0.5400	0.5400	0.5400	0.5400
Arterial road dust	0.8400	0.8400	0.8400	0.8400
Local road dust	0.8000	0.8000	0.8000	0.8000
net emission rate				
- average all road & vehicle types -	0.97	0.97	1.00	0.97
seasonal VMT	1,644,076	1,583,391	1,795,744	1,742,729
Tailpipe Particulates (tons/day)	0.06	0.05	0.05	0.05
Road Dust Particulates (tons/day)	1.69	1.64	1.86	1.81
Projection* (tons/day)	1.75	1.69	1.91	1.86
Conformity (Projection < Budget?)	Pass	Pass	Pass	Pass

** Includes road dust, elemental carbon, organic carbon, gasoline exhaust particulates, tire wear, and brake wear.

a-budget year, b - 10-year rule, c - last year of Plan, d - no budget 5-year rule

* Projection = Emission Rate x seasonal VMT, divide by 453.5 to convert to pounds, divide by 2,000 to convert to tons.

Salt Lake County PM₁₀ Conformity

The PM_{10} SIP does not define a budget beyond the year 2003. Therefore, conformity tests are required only for analysis years which are identified in accordance with 40 CFR 93.118. All

analysis years after 2003 must meet the 2003 budgets for primary particulates and secondary particulates (see the discussion above under Ogden PM_{10} Conformity for an explanation of primary and secondary PM_{10} emissions). The State air quality rule R307-310 allows a portion of the surplus primary PM_{10} budget to be applied to the secondary PM_{10} budget for conformity purposes. Table 5 below shows that budget adjustments were unnecessary for analysis years 2015, 2025, and 2030.

Table 5

Salt Lake County PM₁₀ Budgets Direct (Dust) and Precursor (NOx) PM₁₀ Emissions

_(tons/day)			
Year	2015	2025	2030
Total PM ₁₀ Budget	72.60	72.60	72.60
Direct PM ₁₀ Budget	40.30	40.30	40.30
NOx Precursor PM ₁₀ Budget	32.30	32.30	32.30
Direct PM ₁₀ Budget to be Traded	0.00	0.00	0.00
Resulting Direct PM ₁₀ Budget	40.30	40.30	40.30
Resulting NOx Precursor PM ₁₀ Budget	32.30	32.30	32.30

Table 6a and Table 6b below demonstrate that projected mobile source emissions are within the emission budget defined in the SIP. The years listed in Table 6a and Table 6b are in accordance with requirements of the Conformity Rule (40 CFR Part 93) as noted in the tables.

From this demonstration it is concluded that the RTP conforms to the applicable controls and goals of the State Implementation Plan for PM_{10} in Salt Lake County.

Table 6a Salt Lake County PM₁₀ - NOx Precursor Conformity Determination

	b	b	C
Year	2015	2025	2030
Budget (tons/day)	32.30	32.30	32.30
emission rate (grams/mile)	0.77	0.32	0.27
seasonal VMT	30,580,921	35,977,839	38,246,955
Projection* (tons/day)	25.83	12.69	11.22
Conformity (Projection < Budget?)	Pass	Pass	Pass

a-budget year, b - 10-year rule, c - last year of Plan, d - no budget 5-year rule

* Projection = Emission Rate x seasonal VMT, then divide by 453.5 to convert to pounds, then divide by 2,000 to convert to tons.

* Projection = Emission Rate x seasonal VMT, then divide by 453.5 to convert to pounds, then divide by 2,000 to convert to tons.

	b	b	С
Year	2015	2025	2030
Budget (tons/day)	40.30	40.30	40.30
tailpipe particulate rates (grams/mile)			
Gpm (gasoline particulates)	0.0044	0.0041	0.0038
Ec (diesel elemental carbon)	0.0049	0.0027	0.0008
Oc (diesel organic carbon)	0.0025	0.0014	0.0004
Pbr (brake particulates)	0.0125	0.0125	0.0125
Pti (tire wear particulates)	0.0091	0.0091	0.0091
road dust particulate rates (grams/mile)			
Freeway road dust	0.5400	0.5400	0.5400
Ramp Road dust	0.5400	0.5400	0.5400
Arterial road dust	0.8400	0.8400	0.8400
Local road dust	0.8000	0.8000	0.8000
net emission rate			
- average all road & vehicle types -	0.84	0.82	0.82
seasonal VMT	30,580,921	35,977,839	38,246,955
Tailpipe Particulates (tons/day)	1.00	1.06	1.14
Road Dust Particulates (tons/day)	27.35	31.60	33.42
Projection* (tons/day)	28.36	32.66	34.56
Conformity (Projection < Budget?)	Pass	Pass	Pass

Table 6b Salt Lake County PM₁₀ - Primary Particulates** **Conformity Determination**

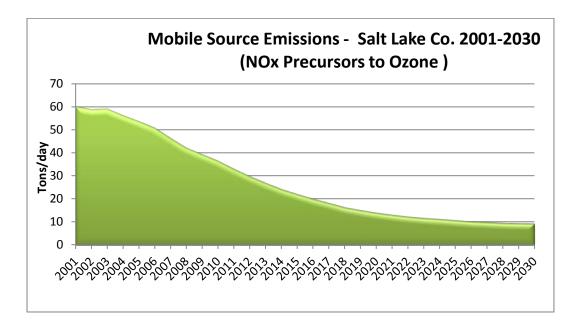
** Includes road dust, elemental carbon, organic carbon, gasoline exhaust particulates, tire wear, and brake wear.

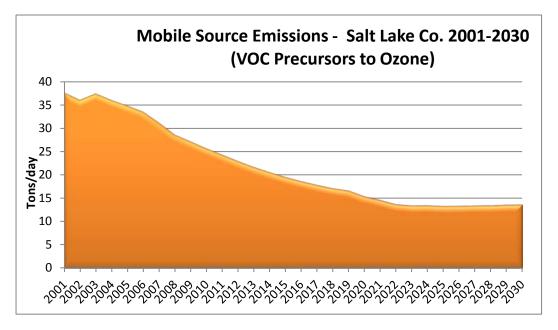
a- budget year, b - 10-year rule, c - last year of Plan, d - no budget 5-year rule * Projection = Emission Rate x seasonal VMT, then divide by 453.5 to convert to pounds, then divide by 2,000 to convert to tons.

Salt Lake and Davis County Ozone Conformity

The 1-hour ozone standard was revoked on June 19, 2005. Therefore, a conformity analysis under the 1-hour ozone standard in Salt Lake and Davis Counties is no longer required.

The Wasatch Front Area is currently in attainment of the new 8-hour ozone standard. Salt Lake and Davis Counties have always shown conformity with past state requirements for ozone related emissions. Projections indicate a steady decrease in mobile source ozone related emissions as shown in the charts below.





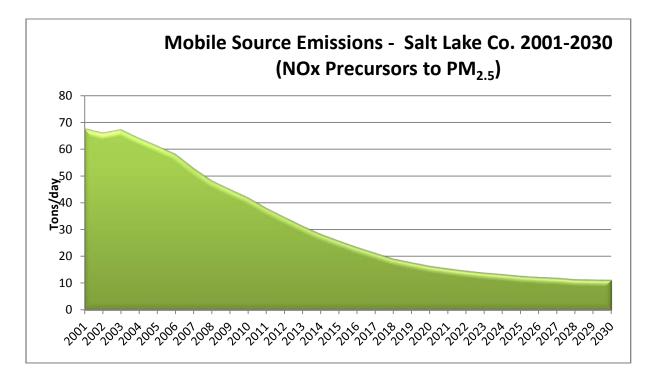
*Source: Mobile6.2 vehicle emission rates and projected vehicle miles of travel based on the Wasatch Front 2030 RTP.

Particulate Matter (PM_{2.5})

It is anticipated that portions of Weber, Davis, Salt Lake, and Tooele Counties will be designated as non-attainment areas under the new PM_{2.5} standard ($35 \mu g/m^3$) that was established in 2006. The previous PM_{2.5} standard was 65 $\mu g/m^3$ and the Wasatch Front Region was in attainment of the former standard. Official EPA non-attainment designations under the new stricter standard will be made the end of 2009 and conformity to the new standard will be required beginning in 2011.

By 2013 the State of Utah will be required to submit a new section of the State Implementation Plan (SIP) documenting how the state will meet the new $PM_{2.5}$ standard. Once the $PM_{2.5}$ SIP is approved by EPA, WFRC will be required to make a conformity determination verifying that transportation related emissions are within the limits established in the SIP. During the interim period from 2011 when $PM_{2.5}$ conformity is required and 2013 when emission limits are established in the SIP, WFRC will be required to establish conformity by demonstrating that future $PM_{2.5}$ emissions are lower than 2002 levels.

A conformity determination for $PM_{2.5}$ is not required for this RTP. However, for discussion purposes a projection of $PM_{2.5}$ related emissions is presented in the chart below to illustrate that $PM_{2.5}$ related emissions from on-road mobile sources are expected to continue their declining trend of the last several years thus making $PM_{2.5}$ conformity a reasonable expectation for transportation plans developed after 2011.



*Source: Mobile6.2 vehicle emission rates and projected vehicle miles of travel based on the Wasatch Front 2030 RTP.

Appendix – 1 Definition of Regionally Significant Projects

Process for Determining Regionally Significant Facilities for Purposes of Regional Emissions Analysis (see CFR 93.105.2.c.1.ii)

<u>Background</u>: 40 FR 93.101 defines "regionally significant project" and associated facilities for the purpose of transportation conformity. The federal definition does not specifically include minor arterials. The following definitions and processes will be used by the Wasatch Front Regional Council (WFRC) and Mountainlands Association of Governments (MAG) in consultation with DAQ, UDOT, UTA, FHWA, FTA, and EPA to determine which facilities shall be considered regionally significant for purposes of regional emissions analysis. It is the practice of the MPO to include minor arterials and collectors in the travel model for the purpose of accurately modeling regional VMT and associated vehicle emissions. The inclusion of minor arterials and collectors in the travel model, however, does not identify these facilities as regionally significant.

- 1. Any new or existing facility with a functional classification of principal arterial or higher on the latest UDOT Functional Classification Map (currently found at <u>http://www.dot.utah.gov/index.php/m=c/tid=1228</u>) shall be considered regionally significant.
- 2. Any fixed guideway transit service including light rail, commuter rail, or portions of bus rapid transit that involve exclusive right-of-way shall be considered regionally significant.
- 3. As traffic conditions change in the future, the MPO's in consultation with DAQ, UDOT, FHWA, and EPA (and UTA and FTA in cases involving transit facilities) will consider 1) the relative importance of minor arterials serving major activity centers, and 2) the absence of principal arterials in the vicinity to determine if any minor arterials in addition to those listed in Exhibit A should be considered as regionally significant for purposes of regional emissions analysis.

Exhibit A Minor Arterials Determined to be Regionally Significant for Purposes of Regional Emissions Analysis

In consultation with DAQ, UDOT, FHWA, and EPA; and based on inspection and engineering judgment of current traffic conditions; and based on application of the "Process for Determining Regionally Significant Facilities for Purposes of Regional Emissions Analysis" agreed upon by the aforementioned agencies; the WFRC and MAG designate the following minor arterials as regionally significant.

Salt Lake County

300 West/Beck Street: 600 South north to I-15 Redwood Road: 14400 South to Utah County line U-111: SR-201 to New Bingham Highway New Bingham Highway: U-111 to 9000 South

Davis County

Syracuse Road: I-15 west to Antelope Island SR-108 (2000 West): Syracuse Road to Weber County line

Weber County

SR-108 (3500 West): Davis County line to Midland Drive SR-108 (Midland Drive): 3500 West to Hinckley Drive SR-79 (Hinckley Drive): SR-108 to I-15

Utah County

Redwood Road: Salt Lake County line to Highway-73

Process for Determining Significant Change in Design Concept and Scope for Purposes of Regional Emissions Analysis (see CFR 93.105.2.c.1.ii)

Changes to regionally significant projects may or may not necessitate a new regional emissions analysis. The following definitions and processes will be used to determine what changes to project concept and scope are to be considered significant or not for purposes of regional emissions analysis.

- 1. Adding or extending freeway auxiliary lanes or weaving lanes between interchanges is not considered a significant change in concept and scope since these lanes are not normally included in the travel model.
- 2. Adding or extending freeway auxiliary/weaving lanes from one interchange to a point beyond the next interchange is considered a significant change in concept and scope.
- 3. A change to a regionally significant project defined in the Regional Transportation Plan that does not change how the project is defined in the travel model is not considered a significant change in concept and scope. These changes include but are not limited to lane or shoulder widening, cross section (other than the number of through lanes), alignment, interchange configuration, intersection traffic control, turn lanes, continuous or center turn lanes, and storage lanes.
- 4. A change to a regionally significant project defined in the Regional Transportation Plan that does alter the number of through lanes, lane capacity, or speed classification as defined in the travel model is considered a significant change in concept and scope.
- 5. Advancing or delaying the planned implementation of a regionally significant project that does not result in a change in the transportation network described in the travel model for any horizon year (as defined in CFR 93.101) is not considered a significant change in concept and scope.
- 6. Advancing or delaying the planned implementation of a regionally significant project that does result in a change in the transportation network described in the travel model for any horizon year (as defined in CFR 93.101) is considered a significant change in concept and scope.
- 7. Project changes not addressed in the above statements will be decided on a case by case basis through consultation by representatives from DAQ, WFRC, MAG, UDOT, UTA, FHWA, FTA, and EPA.