Appendix C: Interagency Consultation and Pre-Consensus Plan

Metrolina MTP Conformity Kick Off 09-29-2025

Meeting notes:

- Meeting Kickoff: Andy initiated the meeting by introducing the participants from various organizations, including Cabarrus Roan MPO, Charlotte Regional TPO, GCLMPO, FHWA, EPA, FTA, and Mecklenburg County Air Quality.
- SIP and Motor Vehicle Emissions Budget: Andy and Todd discussed the assumptions for the upcoming SIP and motor vehicle emissions budget. Todd confirmed that the current approved budgets using the Moves model are sufficient due to the inclusion of electric vehicles.
    - Assumptions Review: Todd reviewed the work done after submitting the latest approved budgets, which are based on the Moves 3 model. He confirmed that the current approved budgets are sufficient.
    - Model Options: Todd mentioned that they have the option to use Moves 5 but are comfortable proceeding with Moves 4, which has been tested against the current approved budgets. (MOVES 4 being used for this analysis)
- Second Maintenance Plan and SIP Approval: Andy and Todd discussed the potential impact of the second maintenance plan on air quality conformity. Todd explained that the current meeting officially starts the conformity process, and if the second maintenance plan is approved during this process, they would not be obligated to use the new budgets.
    - Conformity Process: Todd explained that the current meeting officially starts the conformity process for the MTP, establishing the budgets of record to be tested against. If the second maintenance plan is approved during this process, they would not be obligated to use the new budgets.
    - Approval Requirements: Todd mentioned that the approval of the second maintenance plan would also require approval of changes to the inspection and maintenance program before the plan is approved.
- VOC Emissions and Safety Margin: Phil inquired about the differences in budgets between the current and proposed plans. Todd explained that the Moves 3 budgets are higher, and the main concern is VOC emissions due to limited safety margin.
    - Budget Differences: Todd explained that the Moves 3 budgets are higher than the proposed budgets. The main concern is VOC emissions, which are going down for the motor vehicle sector but increasing for other sectors, resulting in a limited safety margin.

    - Safety Margin: Todd highlighted that the limited safety margin means there is less buffer to pad onto the budgets during development, particularly for VOC emissions.
- Anticipated SIP Effective Date: Phil asked about the anticipated effective date of the SIP for the next 10-year maintenance plan. Weston from EPA mentioned that the maintenance plan and related removal of the inspection and maintenance program are under review and approval, with an optimistic estimate of early 2026.
    - Review Status: Weston from EPA mentioned that the maintenance plan and related removal of the inspection and maintenance program are both awaiting review and approval, with the process about halfway through internal review before publication.
    - Estimated Date: Weston provided an optimistic estimate of early 2026 for the effective date of the SIP, potentially earlier depending on the completion of the review and approval process.
- Regionally Significant Projects: Andy and Phil discussed the importance of identifying regionally significant projects for the modeling process. Heather emphasized that changes to non-regionally significant projects do not impact conformity.
    - Project Identification: Andy and Phil discussed the importance of identifying regionally significant projects for the modeling process, ensuring that all such projects are included in the conformity analysis.
    - Non-Significant Changes: Heather emphasized that changes to non-regionally significant projects do not impact conformity, allowing the modeling process to proceed without disruption from minor amendments.
    - MPOs send Regionally Significant Projects to NCDOT for review. MPOs send MTP Regional Significant project lists to NCDOT (Andy and Heather) for review. Process similar to what took place for the STIP Transportation Conformity earlier this year.
- Modeling Process Update: Andy and Martin discussed the progress of the modeling process. Martin confirmed that most projects are coded, with only minor questions remaining. They aim to complete the modeling by the end of October.
    - Progress Update: Martin confirmed that most projects are coded, with only minor questions remaining. They are in a good place and aim to complete the modeling by the end of October.
    - Minor Questions: Martin mentioned that they reached out to Tori and Julio with Gaston, Cleveland, Lincoln for minor questions regarding project coding.

- MTP and TIP Amendments: Andy and Neil discussed the timeline for MTP and TIP amendments. Neil confirmed that their board meeting is on October 15th, and they anticipate approval of the step on that date.
- Air Quality Conformity Document: Andy and Phil discussed the preparation of the air quality conformity document. Phil agreed to take the lead on drafting the document, with Tori offering assistance.
    - Document Preparation: Phil agreed to take the lead on drafting the air quality conformity document, with Tori offering assistance. Phil mentioned that he has done it in the past and is willing to guide Tori through the process.
    - Assistance Offer: Tori offered to assist Phil in preparing the document, expressing willingness to help the group despite her lack of experience in drafting such documents.
- Public Comment Period: Andy and Neil discussed the timeline for the public comment period on the draft conformity determination document and the draft MTP report. They plan to open the public comment period in January and close it in mid-February.
    - Timeline Plan: Andy and Neil discussed the timeline for the public comment period, planning to open it in January and close it in mid-February. Neil mentioned targeting a 30-day public comment period starting on January 12th and ending on February 14th for CRTPO. (CRMPO and GCLMPO will have similar Jan-Feb public comment periods)
    - Board Actions: Neil mentioned that their board will take action at the November meeting to approve the opening of the public engagement period on the draft conformity determination document and the draft MTP report. (CRMPO will take for TAC action in October, GCLMPO in early November)
- Federal Review Process: George explained the federal review process for the conformity determination. The review will begin after the public comment period closes and the MPO boards take action. EPA and FTA will have 30 days to review and provide feedback.
    - Review Process: George explained that the federal review process for the conformity determination will begin after the public comment period closes and the MPO boards take action. EPA and FTA will have 30 days to review and provide feedback.
    - Sequential Steps: George emphasized the sequential nature of the process, with NCDOT's board, MPO boards, and federal agencies taking actions in a specific order to ensure conformity determination is made without delays.

Follow-up tasks:

- Review of SIP and Emissions Budgets: Review and confirm the current approved budgets with the new model moves for the upcoming SIP. (Todd)
- SIP Approval Timeline: Provide an update on the anticipated effective date of the SIP for the next 10-year maintenance plan. (Weston)
- MTP and TIP Amendments: Confirm the approval of the STIP by the Charlotte board on October 15th. (Neil)
- Project List Submission: Ensure all MPOs have submitted their project lists by Horizon year to Martin. (All MPOs)
- Modeling Process Update: Provide an update on the status of the modeling runs and any minor questions to the partners. (Martin)
- Regionally Significant Projects: Confirm if there are any regionally significant projects to be added or reviewed for the modeling process. (All MPOs-send to NCDOT for review asap)
- Public Comment Period: Prepare to open the public comment period for the draft conformity determination document and the draft MTP report in January. (All MPOs)
- Air Quality Conformity Document: Draft the air quality conformity document and gather all necessary information from the appropriate partners. (Phil w/ help from Tori)

Metrolina Area Transportation Conformity: Pre-Analysis Consensus Plan (8-Hour Ozone)

September 29, 2025

Prepared Cooperatively Between the
Charlotte Regional Transportation Planning Organization, Cabarrus Rowan Metropolitan Planning Organization, the Gaston Cleveland Lincoln Metropolitan Planning Organization and the Rocky River Rural Planning Organization
North Carolina Department of Transportation
and the
Federal Highway Administration

Metrolina Area Transportation Conformity: Pre-Analysis Consensus Plan September 29, 2025

The Metrolina Regional Metropolitan Planning Organizations and the North Carolina Department of Transportation (NCDOT-representing rural portions of the Metrolina maintenance area are proposing the following plan and procedures to conduct a transportation conformity analysis. This plan is being submitted to the interagency consultation partners for soliciting consensus before commencement of a full-scale transportation conformity analysis. The plans and procedures may be revised as the MPO's and NCDOT proceed with the analysis. After consensus is reached; notification of changes will be made to the interagency consultation partners.

Metrolina Area MPOs (*for this conformity process*):

- Charlotte Regional Transportation Planning Organization (CRTPO)
- Cabarrus Rowan Metropolitan Planning Organization (CRMPO)
- Gaston Cleveland Lincoln Metropolitan Planning Organization (GCLMPO)

Donut Areas:

- Rocky River RPO - Rural portion of Union County outside of the MPO area

The following pollutants will be included in this conformity determination:

- 1997 8-Hour Ozone - No regional emissions analysis per 40 CFR 93.109(c)
- 2008 8-Hour Ozone

Metropolitan Transportation Plan (MTP) and Metropolitan Transportation Improvement Program (MTIP)

1. **Existing Land Use and Demographics: For CRTPO, CRMPO, GCLMPO and rural (donut) Union County**

Staff collected data as outlined in Attachment A. An economist was contracted to produce population, household, and employment estimates in five-year increments from 2025 to 2055 using

a top down approach. The Regional partners then applied local knowledge to finalize the county totals in their areas and produce the Traffic Analysis Zone (TAZ) level base year data. CRMPO also applied local knowledge to produce their TAZ level projections. CRTPO and GCLMPO used the Metrolina CommunityViz Model 3.0 as a base year data management tool and applied the model to develop TAZ level projections. The Metrolina CommunityViz Model was developed under contract to the Centralina Council of Governments and City Explained, Inc.

Data sources include the following:

- 2022 Census Estimates
- 201**4**-201**8** American Community **Survey, North Carolina Office of State Budget and Management 2022 data and projections;**
- **NCSTM Gen 4 SE data for P6.0;**
- 2022 InfoUSA employment data;
- **Institute of Transportation Engineers Trip Generation Manual, Ninth Edition;**
- 2020 Public Use Microdata Sample (PUMS) data;
- Bureau of Economic Analysis (BEA) data;
- area school system data;
- building permit data;
- tax data;
- zoning; and
- land use plans

2. MTP Model Validation (Base) Year:
2022

TIP Years: 2026-2035

4. MTP Horizon Year: 2055

5. MTP Travel Demand Intermediate Years: 2026, 2035, 2045 and 2055

6. Transportation Conformity Analysis Years (2008 8-Hour Ozone)

The Tables below summarize transportation conformity analysis methods and years for the different parts of the Metrolina non-attainment/maintenance areas. Specific conformity year information is listed in the following tables:

2008 O3 Maintenance SIP

County	Area model status	Area emissions budget status	Emissions analysis source	Emission comparison years				
				2026[2] *(modeled)*	**2035** *(modeled)*	**2045 Horizon** *(modeled)*	**2055 Horizon** *(Modeled)*	
Charlotte Region TPO-Rocky River RPO MVEB (all of Mecklenburg and *portions of Union and Iredell County in the maintenance area*)	Modeled all	2008 8-Hour Ozone Maintenance Plan	MRM[1]	O3	O3	O3	03	
Cabarrus Rowan MPO (*portions of Cabarrus and Rowan County in the maintenance area*)	Modeled all	2008 8-Hour Ozone Maintenance Plan	MRM[1]	O3	O3	O3	03	
Gaston Cleveland Lincoln MPO (*portions of Gaston and Lincoln County in the maintenance area*)	Modeled all	2008 8-Hour Ozone Maintenance Plan	MRM[1]	O3	O3	O3	03	

1. The base year of the MRM is 2022
2. 2026 is a SIP MVEB for NOx and VOC

Additional table notes and explanations:

County:

- 2008 Ozone: The Metrolina area is maintenance for the 2008 Ozone Standard which consists of 1 whole county and 6 partial counties (Mecklenburg (CRTPO), Union (CRTPO-partial), Union (RRRPO-donut), Gaston (GCLMPO-partial), Cabarrus (CRMPO-partial) Rowan (CRMPO-partial), Lincoln (GCLMPO partial) and Iredell (CRTPO-partial).

***Note:** a donut area is an area outside the MPO boundary but within the non-attainment/maintenance area.*

Model Status: Mecklenburg, Union, Cabarrus, Rowan, Gaston, and Lincoln, plus one partial county (Iredell) are completely within the Metrolina Regional Model (MRM) boundary.

Emissions analysis years:

- 2008 8-hour Ozone Standard Maintenance SIP: 2 2026 (modeled) 2035 (modeled), 2045 (modeled) and 2055 (modeled)

Emission analysis source: The VMT and speeds for the regional emissions analysis (REA) will be derived from the MRM.

Emission Comparison Years:

- Motor Vehicle Emissions Budget Test
  - **2008 8-Hour Ozone Maintenance SIP**: *(Gaston-partial, Mecklenburg, Cabarrus-partial, Rowan-partial, Union-partial, Lincoln-partial, and Iredell-partial,* 2026 (modeled-compare to 2026 MVEB), 2035 (modeled- compare to 2026 MVEB), 2045 (modeled-compare to 2026 MVEB) and 2055 (modeled-compared to 2026 MVEB)

List of Specific Conformity Years

2008 8-Hour Ozone Maintenance SIP

Horizon: 2055

a. 2008 8-Hour Ozone Maintenance SIP MVEB Years: 2026
b. Emission comparison years (NOx and VOC): 2026 (modeled), 2035, 2045 & 2055

7. Non-attainment / Maintenance Counties:

- 2008 8 Hour Ozone Maintenance Area: Gaston Co. (partial)., Mecklenburg Co., Cabarrus Co. (partial), Rowan Co.(partial), Union Co.(partial), Lincoln (partial), and Iredell Co. (partial)

8. Land-Use Demographics Projections/Forecast:

Land-use demographic projections for the region were developed using both a top-down and bottom-up approach.

An economist was contracted to develop regional and county level population, household, and employment projections for 5-year increments from 2025 to 2055 through a top-down forecasting approach. The economist's forecasting model is based on national growth patterns and calibrated to trends and capture rates in the Metrolina region. Refer to the *Metrolina Population and Employment Projections Report V5.1, December 27, 2023, by Fourth Economy* for more detailed

information. MPO and RPO staff also reviewed county level projections from the sources referenced in this section and then applied local knowledge reflecting current local policies and plans to finalize county-level control totals for 2025, 2035, 2045, and 2055.

TAZ level 2025, 2035, 2045 and 2055 population, household, and employment data was projected for CRTPO and GCLMPO through a top-down /bottom-up forecasting approach using the Metrolina CommunityViz Model v3.0. CRMPO applied local knowledge through a manual process to allocate projected data to the TAZ level. For both approaches, data inventoried for the base year was used as quantitative inputs to the process of deriving projections. Qualitative inputs to the projections to both processes include future land use plans, building permits data, transportation plans and other capital improvements plans (such as water and sewer extensions and school construction), and other factors limiting development (such as soils, floodplains, and water supply watershed regulations). Refer to the Metrolina CommunityViz Model v3.0 Technical Summary Document, September 16, 2024, by Matt Noonkester, AICP, City Explained, Inc. for detailed information.

9. Travel Demand Model: Metrolina Regional Model (MRM)

The regional travel demand model is a simplified tour-based model developed for a 2-state, 13-county (10 whole, 3 partial) region (refer to Attachment B). The modeling area encompasses 4 MPOs and 1 RPOs.

As described previously, a multitude of land use and demographic data was collected as input into the model. Additional data collected includes transit and highway network data as well as multiple travel surveys. Transit data collected includes routes, headways, and travel times. Refer to Attachment C for the highway network data dictionary. Following is a list of the travel surveys completed:

2022 Passive Origin Destination Data;
2023 Household Travel Survey;
2022 On-board CATS Origin-Destination Study and Counts;
2022 INRIX Speed Data; and
2022-2024 Vehicle Classification Counts

10. Mode Split / Mode Choice:

The mode choice model for Metrolina was estimated based on the 2023 household survey records for 6 tour purposes: Work, Other, Shop, University, Sub-Tour and School tours. These models are estimated as nested logit models. In the context of application, the tour mode choice model is applied after the tour destinations and tour time of day are determined.

Transit paths include in-vehicle travel time, out-of-vehicle time (walking / driving and waiting), transfers, and direct cost (fare, parking). Nesting and mode constraints were developed using CATS's on-board ridership survey conducted in 2022.

The mode choice model was developed under contract with Caliper Corporation.

11. Local Street Count & VMT Estimate:

Vehicle miles of travel (VMT) – the sum of the distance that each vehicle travels during a specified period (day, year, etc.) – is the most typical measure of the level of travel in an area.

Like most statistics, it is still impossible to actually measure. To do so, *all* vehicles would have to be monitored all day. The most common method of estimating VMT uses traffic counts. We have a large count database from CDOT, NCDOT, and SCDOT including counts from 2000 – 2024. Each count will be factored to the base year 2022. Average Daily Traffic volumes will be factored to Average Weekday volumes. The adjusted base-year weekday counts are then aggregated by County and functional class. The average (mean) volume for each county / functional class will be multiplied by the number of road miles to obtain VMT. For future year estimates, the travel demand model, calibrated to the base year counts and VMT, will provide VMT for thoroughfares (VMT = assigned volume * length).

Local streets make up 60%-70% of the roadway miles, but a much smaller fraction of VMT. Most serve to accumulate traffic from neighborhoods. The bulk of the trip is then made on thoroughfares (that are modeled). Few local streets are included in the model. Counts are sporadic and usually concentrated on local streets experiencing traffic problems. Many of the local streets are represented by zonal centroid connectors in the model. We will use the centroid connectors times 2 to better approximate actual local VMT. VMT derived with this method compares favorably with local VMT estimated using street miles and assumed volumes. The centroid method provides a better method of relating VMT to high growth TAZs.

12. Rural (Donut) Area Projects

The rural areas do not develop long range transportation plans like the MPOs. The rural area projects that are included in the conformity regional emissions analysis (REA) come from the State TIP. It is NCDOT's position that projects that are in the State TIP and have right of way or construction phases scheduled in the first seven years should be included in the REA. In addition, for rural areas adjacent to an MPO the MPO may extend projects outside their boundary to a logical terminus. The MPO may include the portion outside of their MPO boundary in the financial element of their MTP.

13. VMT Adjustments:

No VMT adjustments are used.

14. Motor Vehicle Emissions Budgets

Three ozone maintenance areas are included within the seven-county Metrolina area:

a. 2008 8-Hour Ozone NAAQS Maintenance Area.
The Charlotte-Gastonia-Salisbury, North Carolina Marginal Nonattainment Area for the 2008 8-hour ozone NAAQS was redesignated as attainment on July 28, 2015 with an effective date of August 27, 2015. The latest approved maintenance plan revision established new NOx and VOC MVEBs, with an effective date of July 15, 2024. The maintenance area consists of one whole county and six partial counties (Mecklenburg (CRTPO), Union (CRTPO-partial), Union (RRRPO-donut), Gaston (GCLMPO-partial), Cabarrus (CRMPO-partial) Rowan (CRMPO- partial), Lincoln (GCLMPO partial) and Iredell (CRMPO-partial). Motor vehicle emissions budgets (MVEBs) were established for three sub-areas within the Metrolina area which are generally defined by MPO jurisdictional boundaries. The current approved MVEBs are show in the table below.

NOx Budgets: 2008 8-hour Ozone NAAQS					
Budget Area	**MVEB Year**	**Comparison Years & MVEB (kg/day)**			
		2026	**2035**	**2045**	**2055**
Cabarrus Rowan MPO	2026	6,543	6,543	6,543	6,543
Gaston Cleveland Lincoln MPO	2026	5,117	5,117	5,117	5,117
Mecklenburg Union MPO/ Rocky River RPO	2026	22,417	22,417	22,417	22,417

VOC Budgets: 2008 8-hour Ozone NAAQS					
Budget Area	**MVEB Year**	**Comparison Years & MVEB (kg/day)**			
		2026	**2035**	**2045**	**2055**
Cabarrus Rowan MPO	2026	4,753	4,753	47,53	4,753
Gaston Cleveland Lincoln MPO	2026	3,583	3,583	3,583	3,583
Mecklenburg Union MPO/ Rocky River RPO	2026	13,818	13,818	13,818	13,818

15. Control Strategies: Emission reduction credits will be taken for the following on-road mobile SIP commitments or Federal programs. Currently there are no TCMs in the Metrolina Area SIPs.

Strategy	**Methodology/Approach**
I/M Program	*Accounted for in the MOVES model*
Tier 2/Tier 3 vehicle's Emission Standards	*Accounted for in the MOVES model*
Low Sulfur Gasoline and Diesel fuels	*Accounted for in the MOVES model*
Heavy Duty Vehicle Rules 2004 and 2007	*Accounted for in the MOVES model*
Low RVP Gasoline	*Accounted for in the MOVES model*
On board vapor recovery	*Accounted for in the MOVES model*

16. MOVES Model Settings: The following model-input parameters will be used in the conformity analysis.

- **2008 Eight Hour Ozone Standard Maintenance Area*:** Cabarrus (partial), Gaston (partial), Lincoln (partial), Mecklenburg, Rowan (partial), Union (partial) and Iredell (partial)

MOVES Model (MOVES4.0.2)

MOVES Model Settings: The following MOVES model-input parameters will be used in the conformity analysis performed by DAQ.

Parameter	**Details**	**Data Source**
a. ***Emissions Model Version(s):***	MOVES4.0.2	
b. ***Emission Model Runs:***	Typical Summer Weekday (NOx and VOC)	
c. ***Evaluation month:***	July (NOx and VOC)	
d. ***Time Periods:***	VMT and speeds modeled for 4 daily travel periods (see item #23 below) will be processed according to USEPA guidance to generate hourly speed and VMT distribution data in the required MOVES input formats.	
e. ***Pollutants Reported:***	NOx, VOC	
f. ***Emissions Budget Years:***	2008 NAAQS: 2026 (NOx and VOC)	
g. ***Emissions Analysis Years:***	2008 NAAQS: 2026, 2035, 2045, and 2055	
h. ***Temperature and Relative Humidity:***	**2008 NAAQS**: July 2014 monthly average 24-hour temperature and relative humidity profiles from the Charlotte-Douglas International Airport (KCLT).	
i. ***Vehicle Classes:***	13	
j. ***VMT mix:***	Statewide mix based on 2023 or 2024 data using the method in the August 2004 USEPA Guidance.	

k. ***Speed Distribution:*** Regional Model MRM22v1.1

l. **Source type (vehicle type) *age distribution:*** The latest available 2023 or 2024) vehicle registration data provided by NCDOT, which also includes a breakdown of the number of vehicles by model year, will be used to create the required source type age distribution input file for each county. As per EPA guidance, the source type age distribution will not be projected for future years.

m. ***I/M Program:*** The following I/M program parameters will apply: compliance rate = 96%, waiver rate = 5% with an exemption for vehicles from the 3-year latest model years.

n. ***RVP:*** July 9.0 psi for all counties

o. ***Source Type (vehicle type) Population:*** Vehicle population estimates will be developed for each future modeling year based on the latest available 2023 or 2024 vehicle registration data provided by NCDOT. This data includes the total number of registered vehicles by county, divided into nine source type categories. The data will first be reorganized into thirteen source type categories (i.e. passenger cars, light commercial trucks, combination long-haul trucks, etc.) as required for MOVES4.0.2. These source type population estimates will then be projected for each required modeling year, using the same base and future year-county human population data that were used in the TDM model, according to the following formula:

Total Vehicle Population $_{\textbf{future year}}$ = Total Vehicle Population $_{\text{base year}}$ * (Human Population $_{\text{future year}}$ / Human Population $_{\text{base year}}$)

p. ***Strategies:*** None

17. Emissions analysis units, conversion factors, significant figures, rounding and truncating conventions:

Units= Kilograms or Grams
Grams to tons conversion factor= Divide x grams by 907184.7 to get tons
Round to 2 decimal places

18. CMAQ Projects: Not Applicable

19. Regionally Significant Projects (Federal and Non-Federal): Not Applicable

20. List of Exempt Projects and Non-Regionally Significant Projects (Federally Funded): Not Applicable

21. **Conformity Schedule:** *(A draft conformity schedule has been developed and is provided as an attachment to this document)*

22. Conformity Determinations: Four organizations will be responsible for making conformity determinations in two distinctive parts of the Metrolina non-attainment/maintenance areas:

i. The CRTPO within its metropolitan area boundary (MAB) -all of Mecklenburg County and parts of Union and Iredell County
ii. The CRMPO within its metropolitan area boundary (MAB) – parts of Cabarrus and Rowan County
iii. The GCLMPO within its metropolitan area boundary (MAB) – parts of Gaston and Lincoln County
iv. The NCDOT for the rural areas are comprised of the parts of Union County that are outside of any MPO MAB

Each of these responsible organizations must make a conformity determination for its respective area to ensure all areas will be designated in conformity.

The following resolutions will be needed for this conformity process:

- CRTPO/CRMPO/GCLMPO
  - 2050 MTP amendment adoption
  - 2024-2033 TIP adoption
  - Conformity Determination for the 2050 MTP amendments
  - Conformity Determination for the 2024-2033 TIP
- NCDOT Conformity Determination for the donut area of Union County

23. Other

- Any reference to York County in this document has been removed since EPA has made the 8-hour ozone designations. Although a portion of York County, South Carolina was designated as part of the bi-state Charlotte 8-hour ozone nonattainment area, they are allowed to demonstrate transportation conformity independent of the North Carolina portion of this nonattainment area. Therefore, the planning assumptions and methodologies used for the York County, South Carolina portion of this nonattainment area is reflected in a separate transportation conformity determination that is generated by the Rock Hill-Fort Mill Area Transit Study Metropolitan Planning Organization.

- The techniques used for this conformity process are the following:
  - VMT and speed will be done for 4 times of day (the 4 times of days are summed for the regional emissions analysis)
    - 6:30 am - 9:30 am
    - 9:30 am - 3:30 pm
    - 3:30 pm - 6:30 pm
    - 6:30 pm - 6:30 am
  - For the MOVES modeling component, the times of day will consist of whole hours and are as follows:
    - 6:00 am – 9:00 am
    - 9:00 am - 3:00 pm
    - 3:00 pm - 6:00 pm
    - 6:00 pm - 6:00 am