

(45)

2025 TRANSPORTATION PLAN REVENUE FORECAST

A draft summary of the DCHC revenue forecast is presented. The Transportation Equity Act for the 21st Century (TEA 21) requires that long-range transportation plans be financially feasible. The Legislation explicitly mandates that the MPOs' long-range transportation plans include "... a financial plan that demonstrates how the long-range plan can be implemented, indicates resources from public and private sources that are **reasonably** expected to be made available to carry out the plan, and recommends any innovative financing techniques to finance needed projects and programs, including such techniques as value capture, tolls and congestion pricing."

The subsequent Metropolitan Planning Rules issued by the Federal Highway Administration (FHWA) in 1999 amplify TEA-21 fiscally constrained transportation plan requirement by stating that MPO plans:

"... include a financial plan that demonstrates the consistency of proposed transportation investments with already available and projected sources of revenue. The financial plan shall comprise the estimated revenue from existing and proposed funding sources that can be reasonably be expected to be available for transportation uses, and the estimated costs of constructing, maintaining and operating the total (existing plus planned) transportation system, over the period of the plan. The estimated revenue by existing source (federal, state, local and private) available for transportation projects shall be determined and any shortfall shall be identified. Proposed new revenue and/or revenue sources to cover shortfalls shall be identified, including strategies for ensuring their availability for proposed investments. Existing and proposed revenue shall cover all forecasted capital operating, and maintenance costs. **All cost and revenue projections shall be based on the data reflecting the existing situation and historical trends.**"

The DCHC Metropolitan Planning Organization (MPO) is adhering to TEA 21 by providing a comprehensive picture of the financing requirements for maintaining and improving the urban area's transportation system. The first step in developing a fiscally constrained Transportation Plan is to determine how much money would potentially be available to sustain and improve proposed transportation system and strategies.

In order to comply with TEA-21 requirements, explicit assumptions had to be made to project revenue source. The major assumptions used to forecast the traditional revenues for the DCHC Transportation Plan are summarized as follows:

1. Existing sources of federal, State, local, and private revenues will continue throughout the Plan horizon (2025).
2. State revenue contributions are expected to continue, with funding levels based on the existing formula.

3. Local sources of revenue, bonds, CIP, impacts, motor registration fees, and car rental for TTA will continue, with growth at inflation rate.
4. TEA-21, due to expire in 2003, will be re-authorized and the State and MPO allocations will reflect past funding levels

Summary of Total Revenue Forecast from Traditional Sources (Federal, State, local and private)

Revenue forecasts were developed using historic trends of traditional funding and the models highlighted below. The table below and the attached graph show the draft total revenue from traditional sources.

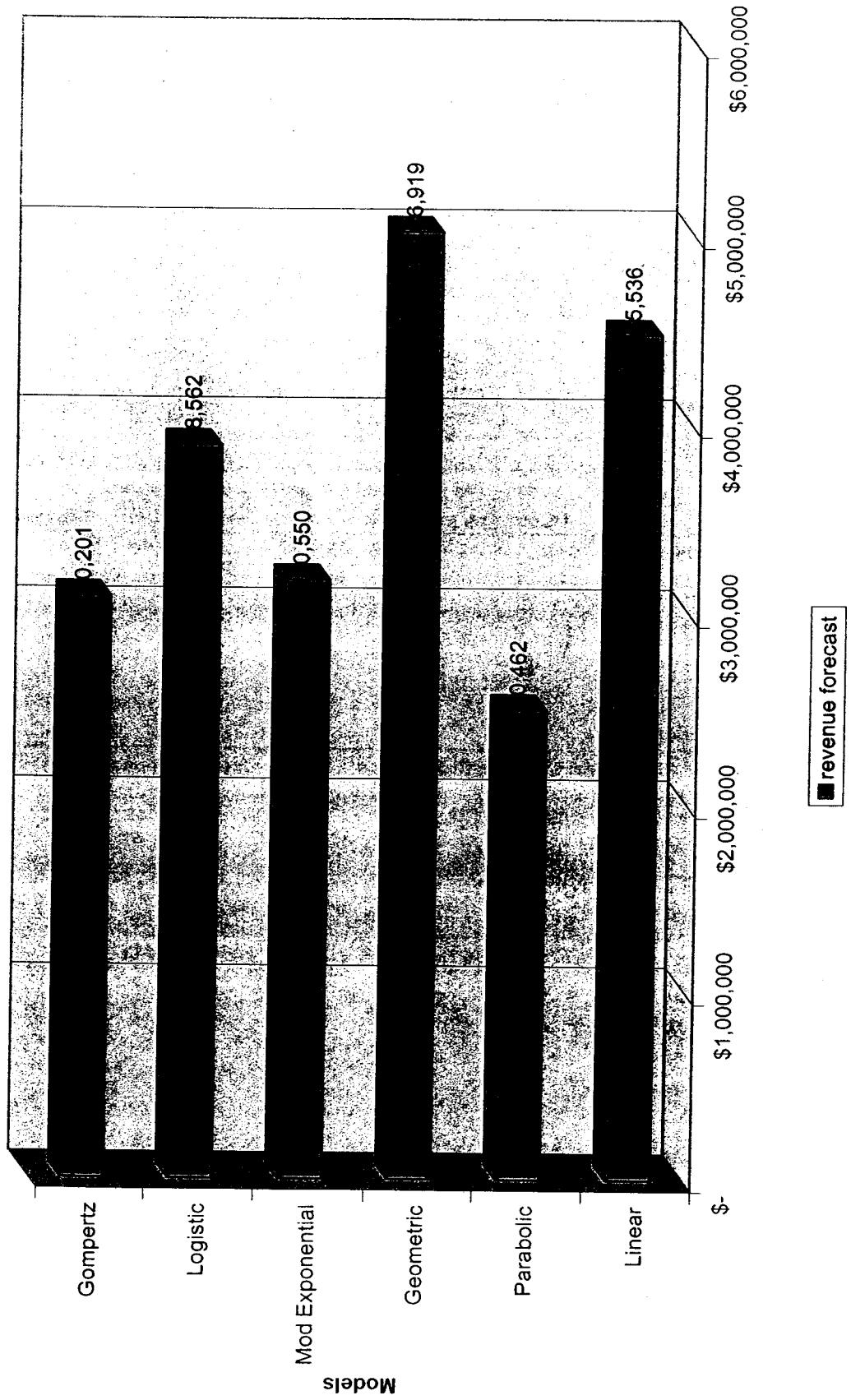
Models	2025 Revenue (\$000)
Linear	\$ 4,475,536
Parabolic	\$ 2,500,462
Geometric	\$ 5,016,919
Mod Exponential	\$ 3,180,550
Logistic	\$ 3,888,562
Gompertz	\$ 3,090,201

Forecast of Other Potential Revenue Sources

Other revenue sources examined are

- Sales tax
- Property Tax
- Tolls (value pricing)
- Sin Tax (alcohol beverages & cigarettes)
- Gasoline tax increase

2025 Revenue Forecast (\$000)



Summary of Revenue Forecasts from Other Sources

Potential New Dedicated Funding Sources
Annual Revenue Estimates (1999 Tax Data)*

Potential Sales Tax Revenue		
	1/2 Percent Tax	1 Percent Tax
Durham /Chapel Hill	\$ 19,662,584	\$ 39,325,168

Potential Regional Motor Fuels Tax Revenue			
	1/2 Cent Tax	1 Cent Tax	2 Cents Tax
Durham /Chapel Hill	\$ 2,047,998	\$ 4,095,995	\$ 8,191,990

Potential Regional Property Tax Revenue			
	1 Cent Tax per \$100	3 Cent Tax per \$100	5 Cent Tax per \$100
Durham /Chapel Hill	\$ 2,058,000	\$ 6,174,000	\$ 10,290,000

*Estimates are for the two county study area; Durham and Orange counties

Sales and Use Tax Collections and Incremental Revenue Potential (Year 2000 Dollars)			
	2000 to 2005 1%	2005 to 2015 1%	2015 to 2025 1%
Durham	\$ 215,707,267	\$ 534,536,530	\$ 870,703,681
Orange	\$ 51,779,099	\$ 128,311,949	\$ 209,006,644
Total	\$ 267,486,366	\$ 662,848,478	\$ 1,079,710,325

Assumes a 5% annual growth over 25 years.

Assessed Real Property Valuation Data

	Assessed Value of Total Taxable Property	Property Tax Annual Revenue 1 Cent Tax per \$100	Property Tax Annual Revenue 3 Cent Tax per \$100	Property Tax Annual Revenue 5 Cent Tax per \$100
Durham	\$ 13,265,000,000	\$ 1,326,500	\$ 3,979,500	\$ 6,632,500
Orange	\$ 7,315,000,000	\$ 731,500	\$ 2,194,500	\$ 3,657,500
Total	\$ 20,580,000,000	\$ 2,058,000	\$ 6,174,000	\$ 10,290,000

Overview of Funding Sources

An important element of the Financial Plan is planning for transportation needs within the current and expected financial constraints. This section presents a description of current federal, state, and local financial resources.

- **Federal Funding**

The Transportation Equity Act for the 21st Century (TEA 21) was signed into law on June 9, 1998. This six-year transportation authorizing legislation increased funding by forty percent (40%) over the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991. TEA 21 authorizes a total \$217 billion for transportation, with \$198 billion guaranteed (\$36 billion for transit). For purposes of this Financial Plan, it is assumed that Congress will maintain its current trend in federal transportation funding over the planning horizon. The federal funding categories on the highway side are: Interstate Maintenance, National Highway System, Bridge, Surface Transportation Program, Congestion Mitigation Air Quality. Bicycle and pedestrian improvements are funded through the Surface Transportation Program. Federal transit funding occurs through formula grants and capital program grants. Federal moneys are distributed to the DCHC urban area through the North Carolina Department of Transportation (NCDOT), with the exception of the Surface Transportation Program Direct Allocation Funds for which the DCHC MPO is directly responsible. North Carolina is a donor state, meaning that under TEA 21 North Carolina is guaranteed to receive a 90.5 % return on the revenue it puts into the Highway Trust Fund via the federal gas tax.

- **State Revenue Sources**

Highway

The State highway budget consists of the Federal Aid Construction Program, the State match from the Highway Fund, and the Intrastate and Urban Loop Programs from the North Carolina Trust Fund. The proceeds from the sale of bonds are also included in the construction budget as of 1998. The Federal Aid and North Carolina Intrastate System funds, which are expended under the Transportation Improvement Program, are distributed throughout the State in accordance with the State's equity formula. For purposes of distribution, counties in North Carolina are grouped into seven regions comprised of two divisions per region. The equity formula is calculated using a factor that is based:

- (1) Twenty-five percent (25%) on the estimated number of miles to complete the Intrastate System projects in the region compared to the estimated number of miles to complete the total Intrastate System;
- (2) Fifty percent (50%) on the estimated population of the distribution region compared to the total estimated population of the state; and
- (3) Twenty-five percent (25%) on the fraction one-seventh, which provides an equal share based on the number of distribution regions.

The DCHC urban area falls under three State funding divisions. Durham County is in Division 5, Orange County is in Division 7, and Chatham County is in Division 8. This inconsistency between federal and State funding boundaries makes it difficult for the DCHC urban area to forecast future revenues.

Transit - Transit 2001/HB 1231

North Carolina's funding for public transportation is among the lowest in the nation. It is currently represents about three percent (3%) of the State's transportation budget. The Transit 2001 Commission provided a number of recommendations on funding desired public transportation improvements.

Bicycle & Pedestrian Program

North Carolina funds bicycle and pedestrian facilities primarily through the distribution of federal Enhancement funds. NCDOT's Bicycle Program imposes an annual funding cap of \$300,000 for individual bicycle projects. The State has placed this funding cap to spread its scarce resources among

projects. However, this also serves to limit its ability to fund larger projects. The State's Pedestrian Policy requires a cost sharing arrangement between State and local governments for funding the construction of sidewalks. The policy calls for a 50-50% cost share for urban areas and an 80-20% State-local cost share for smaller communities. NCDOT's Powell Bill Program is another source of revenue that can be utilized for pedestrian facilities. While used principally for street maintenance, municipalities can also use their Powell Bill funds to construct and maintain sidewalks.

- Local Revenue Sources

Historical Trend

This section provides historical financial information for expenditures and revenues. The information is provided on a county and municipal basis (and for the urban area where available). The historical expenditures have also been broken down by transportation mode to see where transportation investment has been made in the past. This task was done to examine the urban area's report card on funding transportation alternatives to the automobile. The historical revenues will be used as the basis from which future projections will be made under the current trend financial scenario. The historical financial information is only presented back to 1992. This date coincides with the implementation of the ISTEA legislation which significantly changed the way in which transportation was funded.

- Historical Expenditures

The categories of transportation expenditures that this document will consider are highway construction, highway maintenance, transit capital, transit operating and maintenance, and bicycle and pedestrian facility construction.

Highway Construction

The State is the responsible entity for constructing roads outside municipal limits. The State highway system accounts for the vast majority of roads and new road construction in the urban area. The expenditures for highway construction, using federal and State funds, is shown below for the three counties which are located or partially located within the urban area.

Exhibit 1: Highway Construction Expenditures by County
(in thousands)

1992	1993	1994	1995	1996	1997	1998	1999	2000	Annual
14,836	27,460	33,693	30,716	27,150	21,922	21,592	26,205	36,953	26,725
11,757	13,145	18,358	19,906	12,548	11,277	10,607	11,277	11,534	13,379
5,098	5,305	7,972	12,390	18,681	32,752	32,696	40,159	21,307	19,596

the nearest \$1000

OT

Highway Maintenance

The maintenance program for the State highway system is funded entirely with State funds and is not subject to the equity formula. The maintenance funds are allocated by the General Assembly for each fiscal year. Therefore, the amount varies from year to year. Two formulas are used for distributing maintenance funds: one for routine maintenance and another for resurfacing. Routine maintenance uses facility categories and road miles, lane miles, and population to allocate maintenance funding. The resurfacing funding formula uses lane miles, population, and pavement condition. These formulas are outlined below.

Routine Maintenance

	Primary	Secondary	Urban
Road Miles		X	
Lane Miles	X		X
Population		X	

Resurfacing

	Primary	Secondary	Urban
Lane Miles	X	X	X
Population	X	X	X
Pavement Condition	X	X	X

The State currently spends about \$2100 per lane mile for routine maintenance and \$871 per lane mile for resurfacing. However, this funding level represents a shortfall of approximately \$705 million over the maintenance needs. According to NCDOT the amount of funding per lane mile that is needed is \$2,989 per lane mile for routine maintenance and \$1,430 per lane mile for resurfacing. The historical expenditures on highway maintenance are provided below.

Exhibit 2: Highway Maintenance Expenditures by County
(in thousands)

County	1992	1993	1994	1995	1996	1997	1998	Average Annual
Durham	2,737	3,382	3,945	3,280	3,447	3,650		3,407
Orange	3,035	2,706	2,987	3,092	3,546	4,643		3,335
Chatham	3,253	3,818	4,091	3,734	4,698	3,891		3,914

* Rounded to the nearest \$1000
Source: NCDOT

• **Historical Revenues**

Exhibit : Historical Federal/State Highway Funding Levels
(in thousands)

Fiscal Year	7-Year Funding Levels				Yearly Average				Post-Year Needs			
	Durham*	Orange	Chatham	MPO	Durham*	Orange	Chatham	MPO	Durham*	Orange	Chatham	MPO
1992-98	129,620	12,834	8,580	151,034	18,517	1,833	1,226	21,576	202,465	30,382	16,926	249,773
1993-99	160,854	15,657	18,486	194,997	22,979	2,237	2,641	27,857	158,150	27,588	7,020	192,758
1994-00	193,832	24,674	19,431	237,937	27,690	3,525	2,776	33,991	189,691	30,888	7,020	227,599
1995-01	181,408	22,504	24,122	228,034	25,915	3,215	3,446	32,576	157,600	30,238	5,070	192,908
1996-02	245,957	32,822	29,325	308,104	35,137	4,689	4,189	44,015	244,143	37,500	0	281,643
1997-03	252,517	36,751	35,139	324,407	36,074	5,250	5,020	46,344	266,183	41,850	0	308,033
1998-04	258,342	34,630	68,594	361,566	36,906	4,947	9,799	51,652	257,458	36,850	34,500	328,808

Source: Historical Transportation Improvement Programs

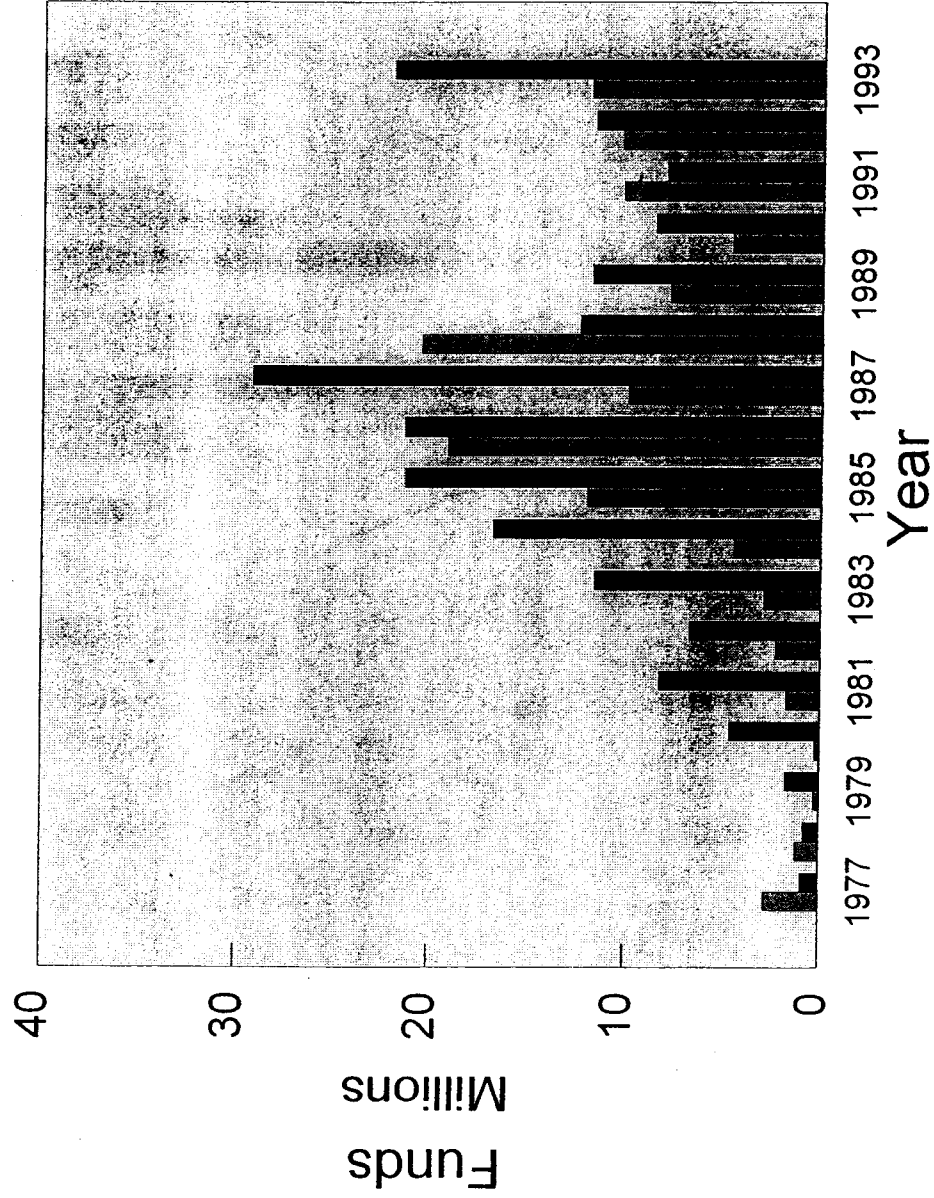
* Includes Loop Funds

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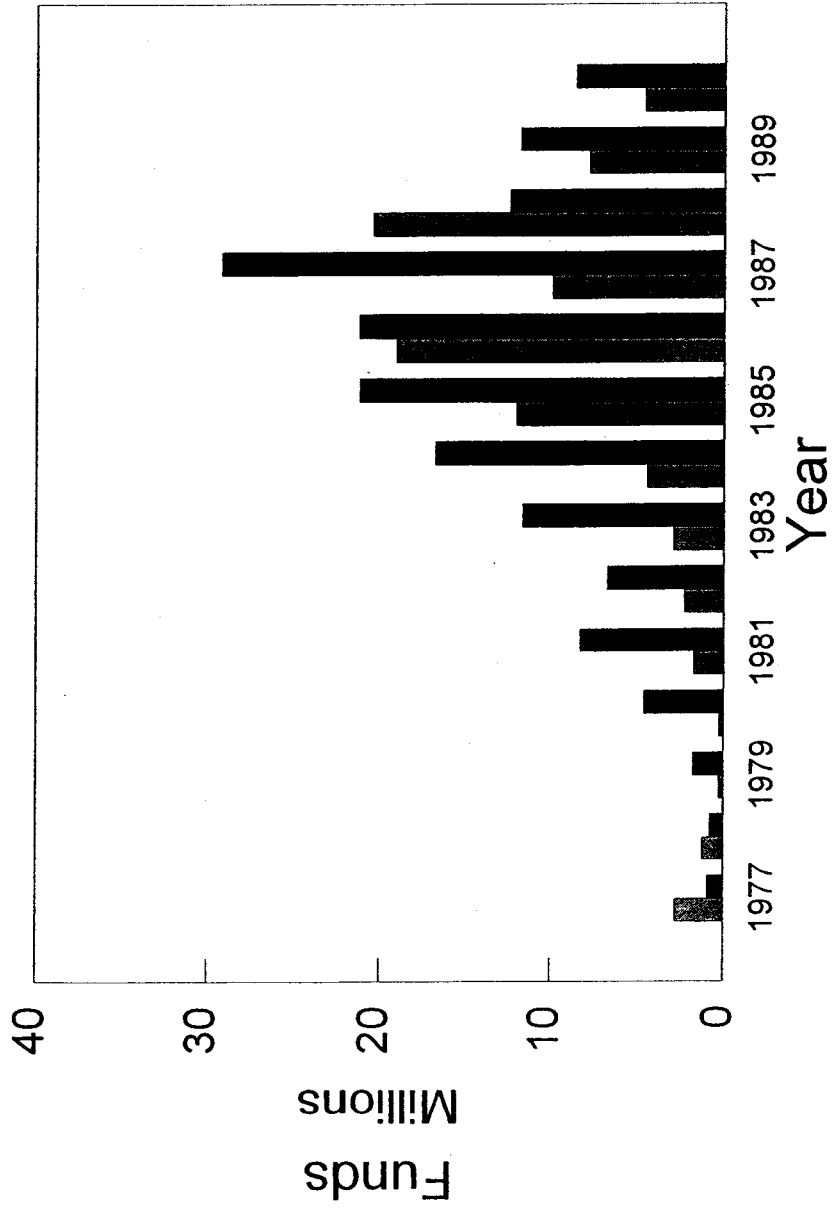
APPENDIX

Federal Aid to Durham & Orange Counties

1977-1992

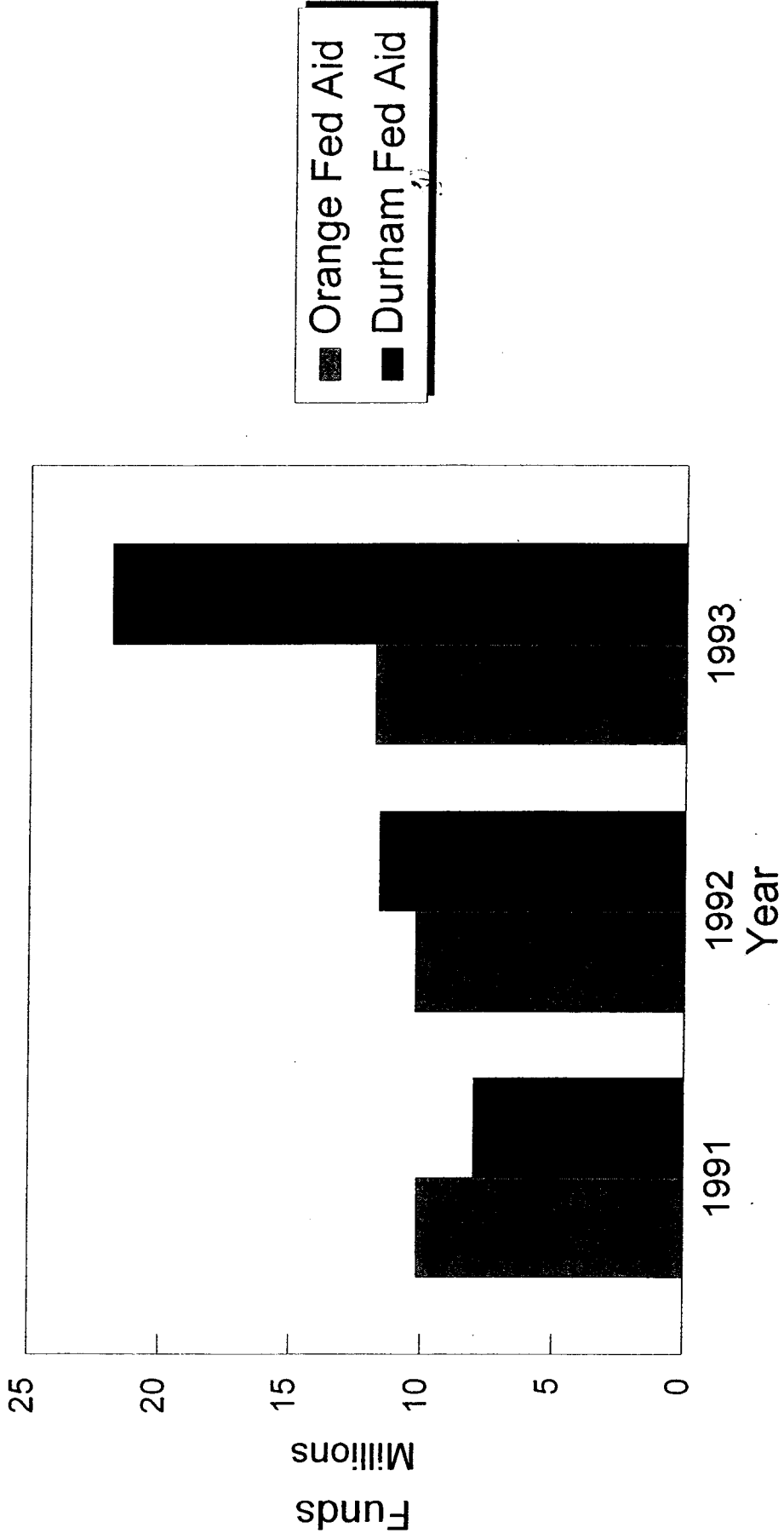


Pre-ISTEA Federal Funding (1977-1990)



Orange Fed Aid
Durham Fed Aid

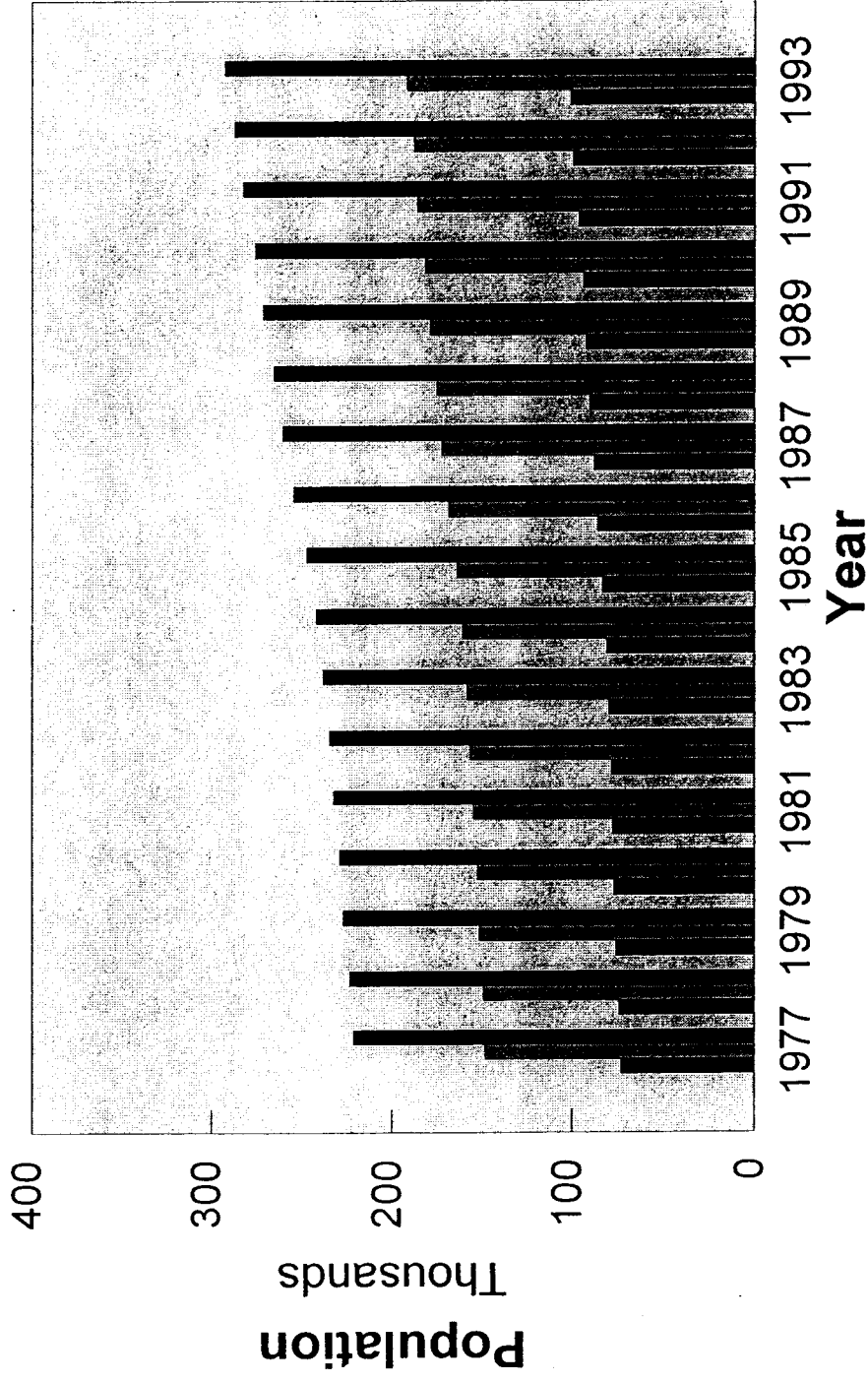
Post-ISTEA Federal Funding (1991-1993)



Historical Data Used for 2010 DCHC MPO Revenue Forecasts

Orange Population	Durham Population	Total Population	Year	Orange Fed Aid	Durham Fed Aid	Orange State	Durham State	Orange Bond	Durham Bond	Orange Trust	Durham Trust	Orange P-A	Durham P-A	Raw Total	1983 \$ Total	1993 \$ Total	
73,200	148,000	221,200	1977	2,803,080	927,883	743,800	1,438,391	14,713	25,914	0	0	0	41,699	61,931	6,057,411	9,728,202	14,057,252
74,100	149,100	223,200	1978	1,206,035	785,082	309,201	1,730,085	77,009	41,218	0	0	0	0	86,649	4,235,279	6,996,681	10,110,204
75,900	151,300	227,200	1979	280,605	1,756,860	402,670	1,346,254	399,527	694,176	0	0	0	54,959	37,558	4,954,609	8,551,655	12,357,142
77,055	152,235	229,290	1980	224,872	4,586,246	362,456	1,223,216	302,725	1,628,276	0	0	0	30,379	20,397	8,378,569	15,282,510	22,083,227
77,855	154,741	232,596	1981	1,728,256	8,247,996	205,571	373,894	500,889	934,256	0	0	0	0	89,504	12,080,366	23,061,419	33,323,750
78,617	156,273	234,890	1982	2,251,476	6,702,681	410,846	533,524	127,595	152,198	0	0	0	0	84,212	10,262,532	20,165,875	29,139,690
80,051	158,201	238,252	1983	2,887,410	11,609,502	534,468	963,662	48,679	463,372	0	0	0	0	180,368	16,677,461	33,286,212	46,101,467
81,274	160,906	242,180	1984	4,399,103	16,746,934	698,451	1,173,844	37,912	1,151,728	0	0	0	0	24,571	24,222,543	23,277,864	33,636,513
83,581	163,952	247,533	1985	11,964,027	21,230,781	782,839	854,244	0	983,941	0	0	0	15,855	255,996	36,087,683	33,345,019	48,183,553
86,132	169,491	254,623	1986	19,036,603	21,260,454	895,297	1,414,192	18,981	298,168	0	0	0	607,647	549,475	44,080,817	39,849,059	57,581,890
87,993	172,472	260,465	1987	9,874,341	29,188,594	736,608	1,612,658	62,244	54,305	0	0	0	0	38,602	41,565,352	35,912,464	51,893,511
90,388	175,152	265,540	1988	20,415,465	12,375,648	1,578,520	3,776,110	52,457	46,925	0	0	0	15,931	217,204	38,478,260	31,436,738	45,426,087
92,543	178,876	271,419	1989	7,787,238	11,775,178	1,741,506	4,520,049	0	19,740	0	0	0	52,073	97,461	25,973,243	19,739,665	28,523,815
93,851	181,854	275,705	1990	4,547,031	8,535,489	1,119,632	3,947,109	0	0	428,306	432,992	0	58,155	106,322	19,175,036	13,288,300	19,201,593
96,265	186,210	282,475	1991	10,163,367	7,995,313	1,030,156	5,690,903	0	0	920,489	488,525	0	0	154,248	26,443,003	16,870,636	24,378,069
98,674	187,911	287,585	1992	10,242,192	11,645,165	893,673	2,938,736	0	0	557,912	899,215	0	623	12,004	27,179,520	16,226,173	23,446,821
100,929	191,836	292,765	1993	11,835,397	21,889,964	740,203	5,650,438	0	0	499,521	419,043	0	0	16,365	41,050,931	22,783,267	32,921,820

Population for Durham & Orange Counties (1977-1992)



COUNTY DURHAM

<i>Fiscal Year</i>	<i>Construction</i>
1990	\$12,227,647
1991	\$12,656,760
1992	\$14,836,004
1993	\$27,460,327
1994	\$33,693,431
1995	\$30,716,071
1996	\$27,149,701
1997	\$21,922,282
1998	\$21,591,645
1999	\$26,204,670
2000	\$36,953,200
Total:	\$265,411,737

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COUNTY ORANGE

<i>Fiscal Year</i>	<i>Construction</i>
1990	\$6,388,099
1991	\$15,330,168
1992	\$12,105,137
1993	\$13,373,472
1994	\$18,700,763
1995	\$20,036,406
1996	\$12,723,789
1997	\$11,472,832
1998	\$10,607,145
1999	\$11,277,132
2000	\$11,534,418
Total:	\$143,549,360

COUNTY CHATHAM

<i>Fiscal Year</i>	<i>Construction</i>
1990	\$8,034,238
1991	\$6,873,218
1992	\$5,164,590
1993	\$5,543,064
1994	\$8,165,550
1995	\$11,980,029
1996	\$18,534,264
1997	\$32,279,572
1998	\$32,696,116
1999	\$40,159,044
2000	\$21,307,205
Total:	\$190,736,890

MEMORANDUM

TO: Mayor and Council

FROM: W. Calvin Horton, Town Manager

SUBJECT: Update on Durham-Chapel Hill 2025 Regional Transportation Plan

DATE: October 22, 2001

This memorandum reviews the anticipated schedule (Attachment 1) for completing the Durham-Chapel Hill-Carrboro 2025 Regional Transportation Plan. This schedule has been prepared by the staff of Metropolitan Planning Organization. The attached resolution would request the Transportation Advisory Committee provide additional opportunities for public comment in the schedule.

BACKGROUND

The Durham-Chapel Hill-Carrboro Urban Area is currently preparing a 2025 Regional Transportation Plan as required by federal transportation and air quality regulations. This Plan includes an assessment of roadway, transit, bicycle and pedestrian system to be implemented through 2025 to maintain mobility within the region and meet regional air quality standards.

The Council's last action with regard to the 2025 Plan was in March, 2001. At that time the Council revised the Chapel Hill 2025 housing and employment projections (Attachment 2). It was anticipated at that time that the 2025 Plan would be completed by November, 2001. Continuing refinements of the Regional Transportation Model and staff turnover has delayed the completion of the 2025 Plan.

On October 10, 2001 the Transportation Advisory Committee reviewed and approved a revised schedule for completing the 2025 Plan (Attachment 1). This schedule has been provided for your information.

DISCUSSION

The schedule reviewed and adopted by the Transportation Advisory Committee proposes to adopt a final draft 2025 Plan by May, 2002. This draft Plan would then be analyzed by federal and State transportation and air quality agencies to determine conformity with federal air quality regulations. The final approval of the 2025 Plan by the Transportation Advisory Committee is anticipated by December, 2002. Federal air quality conformity guidelines require the approval of a 2025 Plan by December, 2002.

Regional staff is currently analyzing fourteen Tier 2 composite alternatives (Attachment 3). The Tier 2 alternatives, B4 on the schedule, were endorsed by the Transportation Advisory

Committee on October 10, 2001. The Tier 2 alternatives were derived from the Tier 1 analysis of 60 separate transportation alternatives. The analysis of the Tier 2 alternatives will result in the identification of three final draft alternatives.

We note that although the adopted schedule proposes a public comment period on the draft 2025 Plan in March, 2002, there are other milestones proposed that could be considered for public comment earlier in the process. We believe it would be useful to allow public comment at those points where the Transportation Advisory Committee reviews the analysis of different alternatives. It is anticipated that in December, 2001, the Transportation Advisory Committee will be presented with the analysis of the fourteen alternatives approved in October by the Committee.

We suggest that the results of the Tier 2 analysis be made available for review and comment by the public. We also suggest a similar public comment period in February, 2002 when the analysis of the three final alternatives is available.

NEXT STEPS

We will provide the Council with periodic updates on the status of the 2025 Plan and related analysis. We anticipate scheduling opportunities for Council review and public comment if the Transportation Advisory Committee agrees to the Council's request for additional public comment. We also expect to schedule opportunities for Council review and public comment after release of the draft 2025 Plan, anticipated now in March or April, 2002.

MANAGER'S RECOMMENDATION

We recommend approval of the attached Resolution requesting the Transportation Advisory Committee provide a public comment period to review the analysis of the fourteen Tier 2 alternatives and the three final draft alternatives. We note that in order to allow the Town Council the opportunity to review and comment on the analysis of Tier 2 alternatives, expected to be released in December, 2001, the public comment period would have to extend through January, 2002.

ATTACHMENTS

1. Revised (10-1-01) DCHC 2025 Transportation Plan Schedule Highlights (p. 4).
2. March 26, 2001 Council memorandum (p. 6).
3. TCC Recommended Alternatives to Tier 2 (p.13).

A RESOLUTION REQUESTING THAT THE DURHAM-CHAPEL HILL-CARRBORO TRANSPORTATION ADVISORY COMMITTEE PROVIDE ADDITIONAL OPPORTUNITIES FOR PUBLIC COMMENT AS PART OF THE DEVELOPMENT OF THE 2025 REGIONAL TRANSPORTATION PLAN (2001-10-22/R-7)

WHEREAS, the Durham-Chapel Hill-Carrboro Transportation Advisory Committee is preparing a 2025 Transportation Plan; and


WHEREAS, as part of the development of the 2025 Plan the Transportation Advisory Committee is analyzing alternative transportation scenarios; and

WHEREAS, the Council of the Town of Chapel Hill recommends that the public be given the opportunity to comment on important milestones of the 2025 Plan as they are being developed;

NOW, THEREFORE BE IT RESOLVED by the Council of the Town of Chapel Hill that the Council requests the Transportation Advisory Committee provide additional public comment periods for the review of analysis of the Tier 2 alternatives and the final three alternatives.

BE IT FURTHER RESOLVED, that the Council requests that the public comment period for the Tier 2 alternatives extend through January, 2002.

This the 22nd day of October, 2001.

Revised (10-1-01) 
DCHC 2025 Transportation Plan
 Schedule Highlights

	Task	Time	Status
A	Plan Schedule revised, Milestones, and Critical Paths Identified		Complete
B	Deficiency Analysis / Purpose and Need Analysis of Existing Condition (Version 2.0 Triangle Regional Model)		Complete
1	Transit Refinement (Model Recalibration)		Complete
2	Highway & Transit Network Update (All Alternatives)		Complete
3	Run Model and Generate Forecast for 60 alternatives (Quick Scan)		Complete
4	Alternative Evaluation Analysis (Target 10 to 15)		To be done by Public, CAC, & TCC. Recommendation to TAC in September.
5	Development of Environmental Screening Overlays Development of Environmental Justice Overlays		Complete
6	Development of Transportation Systems Cost Database	Nov-01	Draft to TCC in October
7	Generation of Preliminary Revenue Forecasts	Nov-01	Draft to TCC in October
8	Bike and Pedestrian Evaluation	Dec-01	GIS Information
9	Analysis of Public Transportation Issues & Trends	Nov-01	Draft to TCC in October
10	Environmental Screening / Environmental Justice of Tier-2	Dec-01	Tier-2 Evaluation
11	Consideration of TEA-21 Planning Factors	Dec 01	Tier-2 results
12	Air Quality Analysis (Preliminary)	Dec 01	Tier-2 results
13	Recommendations for Preliminary Preferred Options (3 Alternatives)	Jan-02	
14	Preferred System Analysis (Regional Performance, MPO performance, and Sub-Area/Corridor performance)	Feb-02	
15	Analysis of Modal System Strategy	Mar-02	
	· Roadway System Strategy		
	· Freight System Strategy		
	· Transit System Strategy		
	· ITS System Strategy		
	· TDM System Strategy		
	· Bike / Pedestrian System Strategy		
16	Environmental Impacts	Mar-02	
17	Development of Financial Plan	Mar-02	
18	Land Use Impacts and Strategy	Mar-02	
19	Plan Implementation/Action Plan	Mar-02	
20	Draft TP - Public Comment	Mar-02	
21	Adopt 2025 Plan (TAC)	May-02	
	Air Quality Conformity		
22	Final Plan Report Writing / Generation of Maps-Graphics	Jan - Mar 2002	
23	Air Quality Determination	May-02	
24	Air Quality Finding by TAC	Nov-02	
25	Air Quality Conformity approval by USDOT	May - Dec 2002	

