

CHAPTER 3: DEMOGRAPHICS

Why Demographics Matter

Demographics are a key component of understanding our transportation system and anticipating where new or improved facilities may be located. Population, housing, and employment are the three main demographic categories used in forecasting travel demand. Not only does the sheer number of people living and working in our area affect our transportation needs, but where we choose to live, and work greatly influences the demand for transportation infrastructure and services. Understanding our area's existing and future housing and employment trends can help to inform and guide our transportation investment decisions. Today's decisions must consider the changing needs of our population and align with future transportation needs.

Households and Population

The Kalamazoo Area Transportation Study has an estimated population of 288,453 with over 103,000 households. The four largest ethnic groups are White (Non-Hispanic) (77.1%), Black or African American (10%), Hispanic (3.33%) and Asian (2.37%). The MPO planning area is expected to experience just over 22 percent population growth during the 30 year period between 2020 and 2050. During this period, the MPO area is expected to grow from 288,453 people to 354,672 people, which results in an estimated 66,219 additional people living in our region.

The number of older adults (age 65 and older) in the Kalamazoo MPO is expected to increase from 13.5% of the population in 2016 to 18% of the population in 2050, according to the U.S. Census Bureau Population and Employment Projections.

Employment

The KATS region currently employs over 166,000 people in a range of industries. Average commute to work time is 20 minutes with over 82% driving alone. Carpooling is estimated at 7.6% and public transportation accounts for 1.7% of those traveling to

work. It is unclear at this time how COVID-19 will effect future work commutes with the rise of stay at home employees during the year 2020.

Employment forecasts estimate a 4 percent increase by the year 2050. According to University of Michigan Forecasts, educational and accommodation services is the largest employing industry in the greater Kalamazoo area, followed by manufacturing, retail trade, and health care. Employment in health care is projected to grow the most of all major industries over the next several years. Other industries anticipated to experience growth rates are education and accommodation services and retail trade. It is expected that manufacturing will decrease by the year 2050.

Air Quality

As part of its transportation planning process, the Kalamazoo Area Transportation Study (KATS) completed the transportation conformity process for KATS' 2050 Metropolitan Transportation Plan (MTP) and the FY2020-2023 Transportation Improvement Program (TIP) and relevant portions of the State Transportation Improvement Plan (STIP). The Transportation Conformity Determination Report for the 1997 Ozone NAAQS (National Ambient Air Quality Standards) demonstrates that KATS' 2050 MTP and the associated FY2020-2023 TIP, as well as the State Transportation Improvement Program (STIP) in Kalamazoo and Van Buren Counties, meet the federal transportation conformity requirements in 40 CFR Part 93. A summary of the report is below.

History of Transportation Conformity

The concept of transportation conformity was introduced in the Clean Air Act (CAA) of 1977, which included a provision to ensure that transportation investments conform to a State Implementation Plan (SIP) for meeting the federal air quality standards.

Conformity requirements were made substantially more rigorous in the CAA Amendments of 1990. The transportation conformity regulations that detail implementation of the CAA requirements was first issued in November 1993 and have been amended several times. The regulations establish the criteria and procedures for

transportation agencies to demonstrate that air pollutant emissions from LRTPs, TIPs, and projects are consistent with (“conform to”) the state’s air quality goals in the SIP.

The Clean Air Act (CAA) section 176(c) (42 U.S.C. 7506(c)) requires federally funded or approved highway and transit activities to be consistent with (“conform to”) the purpose of the State Implementation Plan (SIP). Conformity to the purpose of the SIP means Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) funding and approvals are given to highway and transit activities that will not cause new KATS 2050 Metropolitan Transportation Plan 197 air quality violations, worsen existing air quality violations, or delay timely attainment of the relevant air quality standard, or any interim milestone. 42 U.S.C. 7506(c)(1). United States Environmental Protection Agency’s (EPA’s) transportation conformity rule establishes the criteria and procedures for determining whether MTPs, TIPs, and federally supported highway and transit projects conform to the SIP, 40 CFR Parts 51.390 and 93.

South Coast Air Quality Mgmt. District v. EPA

On Feb. 16, 2018, the United States Court of Appeals for the District of Columbia Circuit in South Coast Air Quality Mgmt. District v. EPA (“South Coast II,” 882 F.3d 1138) held that transportation conformity determinations must be made in areas that were either nonattainment or maintenance for the 1997 ozone NAAQS and attainment for the 2008 ozone NAAQS when the 1997 ozone NAAQS was revoked. These conformity determinations were required in these areas after Feb. 16, 2019. The Grand Rapids area (Kent and Ottawa counties) was in maintenance at the time of the 1997 ozone NAAQS revocation on April 6, 2015 and was also designated attainment for the 2008 ozone NAAQS on May 21, 2012. It was also designated attainment for the 2015 ozone NAAQS on Aug. 3, 2018. Therefore, per the South Coast II decision, a conformity determination must be made for the 1997 ozone NAAQS on the LRTPs and TIPs.

Criteria and Procedures for Determining The Transportation Conformity

Determination Report was completed consistent with CAA requirements, existing associated regulations at 40 CFR Parts 51.390 and 93, and the South Coast II decision,

according to EPA's Transportation Conformity Guidance for the South Coast II Court Decision issued on Nov. 29, 2018, and followed the criteria and procedures outlined below.

The transportation conformity regulation at 40 CFR 93.109 sets forth the criteria and procedures for determining conformity. The conformity criteria for MTPs and TIPs includes latest planning assumptions (93.110), latest emissions model (93.111), consultation (93.112), transportation control measures (93.113(b) and (c)), and emissions budget and/or interim emissions (93.118 and/or 93.119). For the 1997 ozone NAAQS areas, transportation conformity for MTPs and TIPs for the 1997 ozone NAAQS can be demonstrated without a regional emissions analysis, per 40 CFR 93.109(c). This provision states that the regional emissions analysis requirement applies one year after the effective date of EPA's nonattainment designation for a NAAQS and until the effective date of revocation of such NAAQS for an area. The 1997 ozone NAAQS revocation was effective on April 6, 2015, and the South Coast II court upheld the revocation. As no regional emission analysis is required for this conformity determination, there is no requirement to use the latest emissions model, budget, or interim emissions tests.

Therefore, transportation conformity for the 1997 ozone NAAQS for the KATS 2050 MTP and the 2020-2023 TIP, and the rural STIP in Kalamazoo and Van Buren counties can be demonstrated by showing the following requirements have been met:

- Latest planning assumptions (93.110)
- Consultation (93.112)
- Transportation control measures (TCMs) (93.113)
- Fiscal constraint (93.108)

Latest Planning Assumptions

The use of latest planning assumptions in 40 CFR 93.110 of the conformity rule generally applies to regional emissions analyses. In the 1997 ozone NAAQS areas, the use of the latest planning assumptions requirement 198 KATS 2050 Metropolitan

Transportation Plan applies to assumptions about transportation control measures (TCMs) in an approved SIP. The Michigan SIP does not include any TCMs.

Consultation

The consultation requirements in 40 CFR 93.112 were addressed both for interagency consultation and public consultation. Interagency consultation was conducted with the Battle Creek Area Transportation Study, Kalamazoo Area Transportation Study and the Michigan Department of Transportation. A Michigan Transportation Conformity Interagency Workgroup (MITC-IAWG) meeting was held on December 17, 2018. Interagency consultation was conducted consistent with Michigan's conformity SIP. Public consultation will be conducted consistent with planning rule requirements in 23 CFR 450. The Public Participation Plan adopted by KATS' Policy Committee establishes the procedures by which KATS engages the public. The same procedures were followed for this document, ensuring that the public has an opportunity to review and comment before the MPOs make a determination. A formal public comment period for the draft conformity report was held from January 13 to May 20, 2020. The KATS Policy Committee will make a formal conformity determination through a resolution at their meeting on May 27, 2020. The draft conformity report can be found at:

<https://katsmpo.org/documents/>.

Timely Implementation of Transportation Control Measures (TCMs)

The Michigan SIP does not include any TCMs. Fiscal Constraint Transportation conformity requirements in 40 CFR 93.108 state that transportation plans and TIPs must be fiscally constrained consistent with the metropolitan planning regulations at 23 CFR part 450. The LRTPs and 2020-2023 TIPs are fiscally constrained, as demonstrated in:

- KATS 2050 MTP, Chapter 10: Moving Forward
- KATS 2020-2023 TIP, Financial Plan as updated to include the most current amendment.
- 2020-2023 STIP, including latest amendments for Kalamazoo and Van Buren counties

Conformity Determination

The transportation conformity process determined and demonstrated that the KATS 2050 MTP, the FY2020-2023 TIP, and the FY2020-2023 STIP for Kalamazoo and Van Buren counties meet the CAA and Transportation Conformity rule requirements for the 1997 ozone NAAQS.

Environmental Justice

Title VI of the 1964 Civil Rights Act (42 U.S.C. 2000d-1) states that “each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

The Kalamazoo Area Transportation Study (KATS) assures that no person shall, on the grounds of race, color, and national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (P.L. 100.259). Specifically, 42 USC 2000d states that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” KATS further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. In addition to Title VI, there are other non-discrimination statutes that afford legal protection. These statutes include the following: Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 USC 324) (sex), Age Discrimination Act of 1975 (age), and Section 504 of the Rehabilitation Act of 1973/Americans With Disabilities Act of 1990 (disability).

More specifically, the Kalamazoo Area Transportation Study assures that efforts will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. Additionally, the Kalamazoo Area

Transportation Study will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.