individual vehicles; i.e., inspection and maintenance, traffic flow improvments, etc. The FMVCP, an integral part of the control strategy, falls in the latter category of measures. Additional improvements are expected from measures which encompass both of the above categories.

Besides the FMVCP, emission reduction measures being implemented include the following:

(1) Traffic engineering improvements;
(2) Bikeways;
(3) Transit development and improvement;
(4) Pedestrian mall;
(5) Staggered work hours;
(6) Traffic flow improvement.

EPA feels that the State has submitted an adequate control strategy for this area. Numerous control measures beyond the FMVCP have been adopted and implemented. Further, 1970 census figures show a combined population for the two cities to be 105,000, thus absolving the lead agency from requiring I/M. EPA is satisfied that all reasonably available control measures have been adopted and are being implemented. Thus, no alternatives analysis or further control strategy development is being required at this time.

(4) *Deficiencies.* The emissions inventory does not include emissions from parking activities (parking lots and on-street parking). This omission is not serious enough to be considered a deficiency and thus does not warrant conditioning the approval of the CO control strategy.

(5) *State Response.* The DEQ has identified an agreement between itself and the Lane Council of Governments (lead agency for developing a CO attainment plan for this area) wherein the latter will provide information on CO emissions from parking activities in their emission inventory.

(6) *Final Action.* EPA approves the Eugene-Springfield AQMA CO attainment plan.

c. Salem—(1) *Background.* The official CO non-attainment designation for Salem included that area within the city limits. However, Mid-Willamette Valley Council of Governments (MWVCOG), the designated lead agency, expanded the "official" non-attainment area to include that area described by the Salem Area Transportation Study (SATS) boundaries.

This larger area, 124 square miles versus 32 square miles for the "official non-attainment area," provides more appropriate coverage of the demographic and geographic Salem urban area and thus represents a more reasonable study area. Neither area, however, exceeds the 200,000 population cutoff used to define the difference between urban and rural non-attainment areas.

As defined by air quality data, the non-attainment problem is relatively marginal. A single monitor located in downtown Salem annually recorded no more than six violations of the 10 mg/m^3 8-hour standard during the four year period of 1974 through 1977.

For all practical purposes, the entire contribution to the CO non-attainment problem is from motor vehicle emissions. The emission inventory shows that 52,250 tpy of CO originated from mobile sources (over 99 percent) while only 196 tons per year were attributed to stationary (area) sources.

(2) *Emissions Reduction Required.* Computer modeling shows that as base year 1977, 2.2 miles of roadway in the urban area were violating the 8-hour CO standard. By the end of 1982, marginal compliance is predicted from emission reductions to be obtained from the FMVCP. This reduction is expected to be 12,000 tpy.

A design value of 11.4 mg/m^3 was used to determine the emission reductions required. This value was derived from measured ambient air quality data.

(3) *Control Strategy.* Because of the dominant role of motor vehicular emissions, the CO control strategy is limited to transportation measures. In fact, the attainment plan takes credit for only the FMVCP in demonstrating attainment by the end of 1982.

However, 9 of the 14 EPA recommended reasonably available control measures are either already implemented or committed for implementation.

These measures, listed below, have not been accounted for in the control strategy and should result in measurable further improvement in CO levels:

(1) Carpool program;
(2) Express bus/park and ride program;
(3) Bicycle plan;
(4) Transit fleet expansion;
(5) Private car restrictions;
(6) On-street parking limitations;
(7) Staggered work hours;
(8) Pedestrian malls;
(9) Traffic flow improvements.

(4) *Deficiencies.* (a) Modeling errors were noted in the vehicles miles traveled (VMT) growth rate curve. VMT growth rate was derived from population projections. However, the 1977 baseline population figures were found to be in error (too high). This resulted in identifying an emission reduction somewhat smaller than that actually needed. Consequently, Salem's ability to attain standards by the end of 1982 was questioned.

(b) The emission inventory does not include emissions from parking activities (parking lots and on-street parking). This omission is not serious enough to be considered a deficiency and does not warrant conditioning the approval of the CO control strategy.

(5) *State Response.* (a) The DEQ corrected for errors in the baseline population figures and re-ran their analysis. Projected 1982 CO concentrations remained below the ambient standard.

(b) The Department stated that, in its opinion, the existing emission inventory in the model adequately accounts for parking lot emissions.

(6) *Final Action.* EPA approves the Salem CO attainment plan. The area is substantially below 200,000 population and corrected modeling results project attainment of the ambient CO standard by the end of 1982.

d. *Medford-Ashland AQMA*—(1) *Background.* The non-attainment area is defined by the AQMA boundaries which encompass the towns of Medford, Ashland, White City, and Eagle Point. Ambient air quality data from this area is limited but, nonetheless, conclusive. A single CO monitor located in downtown Medford has provided data only since 1977. However, numerous violations of the 8-hour standard have been recorded each year with 8-hour concentrations as high as 22 mg/m^3. The one-hour standard has never been exceeded. Modeling has shown that an estimated 20 miles of roadway violated the 8-hour standard in 1977.

The base year 1977 CO emission inventory for the AQMA shows that approximately 83 percent of the 59,500 tons per year inventoried originated from motor vehicles.

Lead agency for development of CO attainment plan is the Jackson County Board of Commissioners. This group has worked closely with the DEQ and the very active citizens advisory committee to develop attainment plans for this area.

(2) *Emission Reduction Required.* Modeling has shown that an estimated 72 percent decrease in CO emissions would be required to attain the 8-hour standard. This problem has been compounded by a lack of traditional transportation planning due to the low population of this area (Medford, the largest town, has a 1970 census population of 28,500). However, the Jackson County Planning Department, lead agency for transportation related air quality planning, is presently developing a needed transportation control plan (TCP). Without this TCP,