

# National Capital Region Transportation Planning Board

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Item 8

## MEMORANDUM

July 17, 2013

TO: Transportation Planning Board

FROM: Ronald F. Kirby  
Director of Transportation Planning

SUBJECT: Review of Comments Received and Recommended Responses for Inclusion in the Air Quality Conformity Assessment for the 2013 Financially Constrained Long-Range Transportation Plan (CLRP) and the FY 2013-2018 TIP, the 2013 CLRP, and the FY 2013-2018 TIP

### Background

At the June 19 meeting, the Board was briefed on the air quality conformity assessment for the 2013 CLRP and FY 2013-2018 TIP, the draft 2013 CLRP, and FY 2013-2018 TIP. These draft documents and web-based information were released for public comment on June 13. The public comment period closed on July 13.

Public comments submitted by individuals, organizations, and businesses were posted as they were received on the TPB web site: [mwcog.org/transportation/public/comments.asp](http://mwcog.org/transportation/public/comments.asp).

This memorandum provides recommended responses to comments received.

The Board will be briefed on comments received and asked to accept recommended responses for inclusion in the air quality conformity assessment for the 2013 CLRP and FY 2013-2018 TIP, the 2013 CLRP, and FY 2013-2018 TIP. The final version of the comments and responses memorandum will be incorporated into the documents scheduled for consideration under agenda items 9 and 10.

### Comments and Responses

The comments received and recommended responses are summarized below:

#### A. **Comments on the Air Quality Conformity Assessment and the Need to Reduce Future Mobile Source Emissions of Nitrogen Oxides (NO<sub>x</sub>)**

**Comment:** The Metropolitan Washington Air Quality Committee (MWAQC) provided written comment in the attached July 10, 2013 letter. The letter states that MWAQC concurs that the transportation-sector emissions associated with the transportation plans meet the approved motor vehicle emissions budgets for ozone season pollutants

and carbon monoxide, and are no greater than the 2002 levels for fine particles pollutants, as is necessary to meet conformity requirements. The Committee points out that the region is now working towards meeting a new more stringent 2008 ozone standard of 75 parts per billion (ppb). Currently the region's air quality monitors show design value levels of 87 parts per billion (ppb). MWAQC's 2014 work program includes the development of a Reasonable Further Progress (RFP) plan to meet the new standard as expeditiously as practicable. MWAQC states that it will need TPB's support in examining mobile sector emissions and to identify new cost-effective strategies to reduce emissions. The committee notes that EPA has initiated a process to review the 2008 standard and may propose to make it even more stringent. MWAQC comments positively on the recent VMT per capita reductions in the region, and urges TPB's continued investment in programs to mitigate future growth in vehicle emissions. MWAQC also emphasizes the need for new federal emission control programs such as Tier 3. The Committee also urges the TPB to maintain its commitments to TERMS and other emissions reduction measures, and suggests that these efforts are essential for meeting the 2008 ozone standard, and potential more stringent standards in the future.

**Response:** The TPB appreciates MWAQC's concurrence that the amended air quality conformity analysis of the 2013 CLRP and FY2013-2018 TIP meets all of the required emissions tests. The TPB recognizes that the region might not meet the more stringent 2008 ozone standard, and agrees that there should be a continued effort to reduce emissions across all sectors. The Board looks forward to working with MWAQC in the development of plans to assist with the continued improvement of air quality in the region. The TPB also supports federal emission control programs such as Tier 3, and agrees with MWAQC on the need for continued investment in public transit, ridesharing, and other programs to reduce emissions. The TPB supports maintenance of commitments to TERMS and other cost-effective emissions reduction measures.

**Comment:** The Maryland Department of the Environment (MDE) provided written comment in the attached July 12, 2013 letter. The letter states that MDE applauds the TPB for implementing programs to meet the area's mobility needs and to protect public health and improve air quality. However, MDE also expresses concerns about the need to better communicate the challenges faced by the region in meeting the new ozone standard, including the need to start showing cleaner air in the summer of 2013. MDE notes that the mobile budgets used in the current conformity process were set using the old 1997 ozone standard, and that there are currently no budgets for the new 2008 ozone standard. It refers to preliminary technical analysis completed by the Ozone Transport Commission (OTC), and suggests that mobile source emissions of nitrogen oxides (NOx) will need to be reduced to levels in the 45 to 50 tons per day to meet the new standard. MDE states that with a 2015 attainment date, area monitors must measure clean data in the summers of 2013, 2014, and 2015. MDE encourages the TPB to work with MWAQC to meet the new standard and to protect public health.

**Response:** The TPB appreciates MDE's comments. The TPB understands that the attainment date for the 2008 Ozone Standard is 2015, and that by the attainment date the region's monitors must have a design value of 75 parts per billion. Conformity

requirements indicate that the region must show adherence to the mobile budgets most recently found adequate by EPA, even if those budgets are not associated with the current standard. The TPB recognizes that the region should continue to make progress to reduce emissions across all sectors to meet the 2008 standard. Federal programs, such as EPA's recently proposed Tier 3 motor vehicle emission and fuel standards, will produce significant additional emissions reductions from mobile sources, and will lead to air quality improvements that are important both for maintaining current NAAQS and for addressing future air quality standards. The TPB looks forward to working with MWAQC and its environmental partners to find the most cost-effective ways to reduce emissions from all sources in order to clean the air while continuing to provide the mobility needed to support a strong regional economy.

**B. The Collector-Distributor Roads Parallel to Dulles Toll Road between VA 684, Spring Hill Rd. and VA 828, Wiehle Avenue**

**Comment:** The Wolf Trap Foundation for the Performing Arts comments that expansion on the eastbound side of the Toll Road would require appropriation of land currently belonging to the foundation and that the cost estimate does not reflect the value of this land. The foundation believes that the westbound lanes would require National Park Service property which is unlikely to be ceded to VDOT, at least not without substantial expense, which is not reflected in the cost estimate. The foundation also expresses concern that if the roads are built, the sound wall at the park would be removed during construction and subsequently replaced closer to the Filene Center which would be in violation of Congressional prohibitions on excessive noise from the Dulles Toll Road at Wolf Trap.

**Response:** The proposed pair of collector-distributor roads along the Dulles Toll Road is part of a comprehensive set of improvements to the transportation network envisioned by Fairfax County in its Comprehensive Plan, and is associated with the redevelopment of the Tysons / Reston area into a urbanized transit-oriented activity center to take advantage of the Metrorail extension (Silver line) through and beyond Tysons/Reston while providing for forecasted growth in employment and population. This project will be developed in response to the pace and schedule of development and the changing performance of the transportation system between now and 2040.

In response to this comment, Fairfax County will determine the right-of-way impacts of the proposed lane expansions on the land owners, including the foundation, the National Park Service, and the Metropolitan Washington Airports Authority (MWA). The county will consult with all affected land owners to identify the potential costs of any land required and to discuss potential mitigation issues. If right-of-way or mitigation issues are identified that require the project to be modified, these changes to the project will be incorporated in the next update of the CLRP.

### **C. VA 28 Manassas Bypass Study from VA 234 to I-66**

**Comment:** A commenter strongly supports the study. He suggests that the bypass should be studied as a 4 lane parkway or a 2 lane transit access road with a congestion management toll for 2-axle vehicles; the interchange with I-66 should only be a half interchange connecting with points east (Tysons/DC); and the roadway should be designed to transport only 2-axle vehicles and buses.

**Response:** The City of Manassas will be conducting the study and these suggestions will be shared with the city staff for consideration as the scope of the study is developed.