



NATIONAL CAPITAL REGION

TRANSPORTATION PLANNING BOARD

Item #5

MEMORANDUM

June 11, 2015

To: Transportation Planning Board

From: Kanathur Srikanth
Director, Department of Transportation Planning

Re: Item 5: Steering Committee Actions and Report of the Director

The attached materials include:

- Steering Committee Actions
- Letters Sent/Received
- Announcements and Updates



NATIONAL CAPITAL REGION

TRANSPORTATION PLANNING BOARD

MEMORANDUM

June 11, 2015

To: Transportation Planning Board

From: Kanathur Srikanth
Director, Department of Transportation Planning

Re: Steering Committee Actions

At its meeting on June 5, 2015, the TPB Steering Committee took the following actions:

- SR18-2015: Resolution on an amendment to the FY 2015-2020 Transportation Improvement Program (TIP) that is exempt from the air quality conformity requirement to include funding for the MD 140 Flat Run Bridge Replacement Project in Frederick County, as requested by the Maryland Department Of Transportation (MDOT)
- SR19-2015: Resolution on an amendment to the FY 2015-2020 TIP that is exempt from the air quality conformity requirement to include funding for the Construction: Federal Lands Highway Project Grouping, as requested by the Virginia Department Of Transportation (VDOT)
- SR20-2015: Resolution on an amendment to the FY 2015-2020 TIP that is exempt from the air quality conformity requirement to update project information for FY 2016 in order to match the updated Washington Metropolitan Area Transit Authority FY 2016 Capital Budget
- SR21-2015: Resolution on an amendment to the FY 2015-2020 TIP that is exempt from the air quality conformity requirement to include funding for Section 5310 Capital and Operating Assistance, as requested by MDOT
- SR22-2015: Resolution to amend the FY 2016 Unified Planning Work Program (UPWP) to include funding to conduct a Long Distance Commuter Bus Study as requested by VDOT
- SR21-2015: Resolution on an amendment to the FY 2015-2020 TIP that is exempt from the air quality conformity requirement to include funding for preliminary engineering for the I-66 Outside The Beltway Project, as requested by VDOT

The TPB Bylaws provide that the Steering Committee “shall have the full authority to approve non-regionally significant items, and in such cases it shall advise the TPB of its action.

**NATIONAL CAPITAL REGION TRANSPORTATION PLANNING BOARD
777 North Capitol Street, N.E.
Washington, D.C. 20002**

**RESOLUTION ON AN AMENDMENT TO
THE FY 2015-2020 TRANSPORTATION IMPROVEMENT PROGRAM (TIP)
THAT IS EXEMPT FROM THE AIR QUALITY CONFORMITY REQUIREMENT
TO INCLUDE FUNDING FOR THE MD 140 FLAT RUN BRIDGE REPLACEMENT
PROJECT IN FREDERICK COUNTY, AS REQUESTED BY THE
MARYLAND DEPARTMENT OF TRANSPORTATION (MDOT)**

WHEREAS, the National Capital Region Transportation Planning Board (TPB), which is the metropolitan planning organization (MPO) for the Washington Region, has the responsibility under the provisions of Moving Ahead for Progress in the 21st Century (MAP-21) for developing and carrying out a continuing, cooperative and comprehensive transportation planning process for the Metropolitan Area; and

WHEREAS, the TIP is required by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) as a basis and condition for all federal funding assistance to state, local and regional agencies for transportation improvements within the Washington planning area; and

WHEREAS, on October 15, 2014 the TPB adopted the FY 2015-2020 TIP; and

WHEREAS, in the attached letter of May 26, 2015, MDOT has requested that the FY 2015-2020 TIP be amended to include \$5.2 million in Surface Transportation Program (STP) and state matching funds for the MD 140 Flat Run Bridge Replacement project in Frederick County, as described in the attached materials; and

WHEREAS, this project is exempt from the air quality conformity requirement, as defined in Environmental Protection Agency (EPA) regulations "40 CFR Parts 51 and 93 Transportation Conformity Rule Amendments: Flexibility and Streamlining; Final Rule," issued in the May 6, 2005, *Federal Register*;

NOW, THEREFORE, BE IT RESOLVED THAT the Steering Committee of the National Capital Region Transportation Planning Board amends the FY 2015-2020 TIP to include \$5.2 million in STP and state matching funds for the MD 140 Flat Run Bridge Replacement project in Frederick County, as described in the attached materials.

Adopted by the Transportation Planning Board Steering Committee at its regular meeting on June 5, 2015.



Maryland Department of Transportation
The Secretary's Office

Larry Hogan
Governor

Boyd Rutherford
Lt. Governor

Pete K. Rahn
Secretary

May 26, 2015

The Honorable Phil Mendelson, Chair
National Capital Region Transportation Planning Board
Metropolitan Washington Council of Governments
777 North Capitol Street, N.E., Suite 300
Washington DC 20002

Dear Chairman Mendelson:

The Maryland Department of Transportation (MDOT) requests an amendment to the State Highway Administration (SHA) portion of the FY 2015-2020 Transportation Improvement Program (TIP) as described below and in the attached memo. The additional funds for these projects are available due to an increase in federal aid obligational authority. The project is a bridge replacement system preservation project and this action does not impact air quality conformity.

TIP ID#	Project	Phase	Amount of New Funding	Comment
6439	MD 140 Flat Run Bridge Replacement	PE CO	\$5,232,000	This is a bridge replacement system preservation project. This project has been broken out of the grouped projects section and is now a stand alone project.

MDOT requests that this amendment be approved by the Transportation Planning Board (TPB) Steering Committee on its June 5, 2015 meeting.

The revised funding status will not impact scheduling or funding availability for other projects in the current TIP, which continues to be fiscally constrained. The cost does not affect the portion of the federal funding which was programmed for transit, or any allocations of state aid in lieu of federal aid to local jurisdictions.

My telephone number is _____
Toll Free Number 1-888-713-1414 TTY Users Call Via MD Relay
7201 Corporate Center Drive, Hanover, Maryland 21076

The Honorable Phil Mendelson
Page Two

We appreciate your cooperation in this matter. If you have any questions or comments, please do not hesitate to contact Ms. Lyn Erickson, at 410-865-1279, toll-free at 888-713-1414 or via email at lerickson@mdot.state.md.us. Of course, please feel free to contact me directly. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Michael W. Nixon".

Michael W. Nixon, Manager
Office of Planning and Capital Programming


Attachment

cc: Mr. Eric Beckett, Acting Chief, Regional and Intermodal Planning Division, SHA
Ms. Lyn Erickson, Manager, Office of Planning and Capital Programming,
Maryland Department of Transportation
Ms. Heather Murphy, Deputy Director, Office of Planning and Capital Programming
Maryland Department of Transportation

MEMORANDUM

TO: Mr. Don Halligan
Director
Office of Planning and Capital Programming
Maryland Department of Transportation (MDOT) Secretary's Office

ATTN: Ms. Lyn Erickson
Mr. Mike Nixon

FROM: Eric Beckett, Assistant Chief 
Regional and Intermodal Planning Division

DATE: May 20, 2015

SUBJECT: Request to Amend the Fiscal Years 2015-2020 National Capital Region
Transportation Improvement Program (TIP)

The State Highway Administration (SHA) hereby requests amendment of the FY 2015-2020 National Capital Region Transportation Improvement Program. SHA is programming additional funding for one project in the National Capital Region as summarized below and detailed in the attached TIP report. This amendment reflects the addition of \$5.2 million in design and construction funding for a new regionally significant system preservation project, MD 140 (East Main Street) Flat Run Bridge 10062 Replacement (TIP 6439).

TIP	Project	Phase	New Funding	Comments
6439	MD 140 (East Main Street) Flat Run Bridge 10062 Replacement, Emmitsburg	PE CO	\$5,232,000	Adding design funding to reflect new regionally significant system preservation project including \$204,000 (STP) and \$51,000 (State) to FY 2015 and \$321,000 (STP) and \$80,000 (State) to FY 2016. Adding construction funding to reflect new regionally significant system preservation project including \$769,000 (STP) and \$192,000 (State) to FY 2016 and \$2.9 million (STP) and \$723,000 (State) to FY 2017.

The additional funds for these projects are available due to an increase in federal aid obligational authority.

Mr. Don Halligan
Page Two

The proposed action will not impact scheduling or funding availability for other projects in the current TIP, which continues to be fiscally constrained. The amended funding does not affect the portion of federal funding programmed for transit or allocations of state aid to local jurisdictions in lieu of federal aid.

After your review, please forward this request to the National Capital Region Transportation Planning Board. Upon approval of the requested TIP amendment, please amend the FY 2014 Statewide TIP (STIP) using the funding information provided in the attached report. If you have any questions, please do not hesitate to contact Mr. Matt Baker, SHA Assistant Regional Planner, at 410-545-5668 or via email at mbaker4@sha.state.md.us.

Attachment: FY 2015-2020 National Capital Region TIP project 6439 report

cc: Ms. Felicia Alexander, Deputy Director, Office of Planning and Preliminary Engineering, SHA
Mr. Matt Baker, Assistant Regional Planner, SHA
Mr. Eric Beckett, Assistant Chief, Regional and Intermodal Planning Division, SHA
Ms. Samantha Biddle, Regional Planner, SHA
Mr. Mark Crampton, District Engineer, SHA

**SUBURBAN MARYLAND
TRANSPORTATION IMPROVEMENT PROGRAM
CAPITAL COSTS (in \$1,000)**

FY 2015 - 2020

Source	Fed/St/Loc	Previous Funding	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	Source Total
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MDOT/State Highway Administration

Other

System Preservation Projects

TIP ID: 6439	Agency ID: FR5361	Title: MD 140 Flat Run Bridge Replacement	Complete: 2018	Total Cost: \$5,900
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Facility: MD 140 at Flat Run	State	0/100/0	134 a	51 a	80 a	723 c			1,046
From:						192 c			
To:	STP	100/0/0	538 a	204 a	321 a	2,892 c			4,186
					769 c				

Total Funds: 5,232

Description: Replacement of MD 140 Flat Run Bridge 10062. The existing bridge is structurally deficient.



Amendment: Additional Design and Construction Funding **Approved on: 6/5/2015**
 Adding design funding to reflect new regionally significant system preservation project including \$204,000 (STP) and \$51,000 (State) to FY 2015 and \$321,000 (STP) and \$80,000 (State) to FY 2016. Adding construction funding to reflect new regionally significant system preservation project including \$769,000 (STP) and \$192,000 (State) to FY 2016 and \$2.9 million (STP) and \$723,000 (State) to FY 2017.

**NATIONAL CAPITAL REGION TRANSPORTATION PLANNING BOARD
777 North Capitol Street, N.E.
Washington, D.C. 20002**

**RESOLUTION ON AN AMENDMENT TO
THE FY 2015-2020 TRANSPORTATION IMPROVEMENT PROGRAM (TIP)
THAT IS EXEMPT FROM THE AIR QUALITY CONFORMITY REQUIREMENT
TO INCLUDE FUNDING FOR THE CONSTRUCTION: FEDERAL LANDS HIGHWAY
PROJECT GROUPING, AS REQUESTED BY THE VIRGINIA
DEPARTMENT OF TRANSPORTATION (VDOT)**

WHEREAS, the National Capital Region Transportation Planning Board (TPB), which is the metropolitan planning organization (MPO) for the Washington Region, has the responsibility under the provisions of Moving Ahead for Progress in the 21st Century (MAP-21) for developing and carrying out a continuing, cooperative and comprehensive transportation planning process for the Metropolitan Area; and

WHEREAS, the TIP is required by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) as a basis and condition for all federal funding assistance to state, local and regional agencies for transportation improvements within the Washington planning area; and

WHEREAS, on October 15, 2014 the TPB adopted the FY 2015-2020 TIP; and

WHEREAS, in the attached letter of May 28, 2015, VDOT has requested that the FY 2015-2020 TIP be amended to include \$204,000 in Federal Lands Access Program (FLAP) and state matching funds for the Construction: Federal Lands Highway project grouping, as described in the attached materials; and

WHEREAS, this project is exempt from the air quality conformity requirement, as defined in Environmental Protection Agency (EPA) regulations "40 CFR Parts 51 and 93 Transportation Conformity Rule Amendments: Flexibility and Streamlining; Final Rule," issued in the May 6, 2005, *Federal Register*;

NOW, THEREFORE, BE IT RESOLVED THAT the Steering Committee of the National Capital Region Transportation Planning Board amends the FY 2015-2020 TIP to include \$204,000 in Federal Lands Access Program (FLAP) and state matching funds for the Construction: Federal Lands Highway project grouping, as described in the attached materials.

Adopted by the Transportation Planning Board Steering Committee at its regular meeting on June 5, 2015.



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION

4975 Alliance Drive
Fairfax, VA 22030

CHARLES A. KILPATRICK, P.E.
COMMISSIONER

May 28, 2015

The Honorable Phil Mendelson, Chairman
National Capital Region Transportation Planning Board
Metropolitan Washington Council of Governments
777 North Capitol Street, N.E., Suite 300
Washington, DC 20002-4201

RE: National Capital Region FY 2015-2020 Transportation Improvement Program Amendment for
Federal Lands Project Grouping

Dear Chairman Mendelson:

The Virginia Department of Transportation (VDOT) requests an amendment to the FY 2015-2020 Transportation Improvement Program (TIP) to add a Project Grouping for "Construction: Federal Lands Highway." VDOT is initially programming \$204,204 in Federal Lands Access Program funds for this project grouping. VDOT staff has entered the project in the TPB's iTIP project database.

The proposed funds are included in recent allocations by the Commonwealth Transportation Board as part of VDOT's FY 2015-2020 Six Year Improvement Program. While the proposed funds are new to the TIP, they are part of the total federal and state funding estimates included in VDOT's financial plan for the 2014 CLRP update. This amendment will not impact the regional air quality conformity analysis since projects eligible for listing in Project Groupings are by definition not regionally significant for the Air Quality Conformity assessment.

VDOT requests that this TIP Amendment be approved by the Transportation Planning Board's Steering Committee at its meeting on June 5, 2015. VDOT's representative will attend the meeting and be available to answer any questions about the amendments.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in cursive script that reads "Helen L. Cuervo".

Helen L. Cuervo, P.E.
District Engineer
Northern Virginia District

cc: Ms. Dianne Mitchell, VDOT
Ms. Maria Sinner, P.E., VDOT-NoVA
Mr. Norman Whitaker, AICP, VDOT-NoVA

VirginiaDot.org
WE KEEP VIRGINIA MOVING

4/29/2015

**NORTHERN VIRGINIA
TRANSPORTATION IMPROVEMENT PROGRAM
CAPITAL COSTS (in \$1,000)**

FY 2015 - 2020

Source	Fed/St/Loc	Previous Funding	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	Source Total	
Federal Lands Highway Program										
Construction : Federal Lands Highway										
TIP ID: 6441 Agency ID:			Title: Constuction : Federal Lands Highway						Complete:	

Facility:	FLAP	80/20/0	204	c					204
From:									
To:								Total Funds:	204

Description: Groupings for federally funded transportation improvements on federal lands.
 TIP AMD to add Federal Lands grouping - add \$163,363 (PB - FLAP) FFY15 CN phase (lco 05/27/15)

Amendment: New Project	Approved on: 6/5/2015
TIP amendment to add Federal Lands grouping - add \$163,363 (PB - FLAP) FFY15 CN phase	

NATIONAL CAPITAL REGION TRANSPORTATION PLANNING BOARD
777 North Capitol Street, N.E.
Washington, D.C. 20002

RESOLUTION ON AN AMENDMENT TO
THE FY 2015-2020 TRANSPORTATION IMPROVEMENT PROGRAM (TIP)
THAT IS EXEMPT FROM THE AIR QUALITY CONFORMITY REQUIREMENT
TO UPDATE PROJECT INFORMATION FOR FY 2016 IN ORDER TO MATCH
THE UPDATED WASHINGTON METROPOLITAN AREA
TRANSIT AUTHORITY FY 2016 CAPITAL BUDGET

WHEREAS, the National Capital Region Transportation Planning Board (TPB), which is the metropolitan planning organization (MPO) for the Washington Region, has the responsibility under the provisions of Moving Ahead for Progress in the 21st Century (MAP-21) for developing and carrying out a continuing, cooperative and comprehensive transportation planning process for the Metropolitan Area; and

WHEREAS, the TIP is required by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) as a basis and condition for all federal funding assistance to state, local and regional agencies for transportation improvements within the Washington planning area; and

WHEREAS, on October 15, 2014 the TPB adopted the FY 2015-2020 TIP; and

WHEREAS, in the attached letter of May 29, 2015 WMATA has requested an amendment to the FY 2015-2020 TIP to update funding information and amounts in FY 2016 to match WMATA's updated FY 2016 Capital Budget, as described in the attached materials; and

WHEREAS, the proposed changes are exempt from the air quality conformity requirement, as defined in Environmental Protection Agency (EPA) regulations "40 CFR Parts 51 and 93 Transportation Conformity Rule Amendments: Flexibility and Streamlining; Final Rule," issued in the May 6, 2005, *Federal Register*;

NOW, THEREFORE, BE IT RESOLVED THAT the Steering Committee of the National Capital Region Transportation Planning Board amends the FY 2015-2020 TIP to update funding information and amounts in FY 2016 to match WMATA's updated FY 2016 Capital Budget, as described in the attached materials.

Adopted by the Transportation Planning Board Steering Committee at its regular meeting on June 5, 2014.



May 29, 2015

The Honorable Phil Mendelson
Chairman, National Capital Region
Transportation Planning Board
Metropolitan Washington Council of Governments
777 North Capitol Street, N.E., Suite 300
Washington, DC 20002-4201

RE: Approval of an Amendment to the FY 2015-2020 TIP to Update Project Information for FY 2016 in order to match the FY 2016 Capital Budget of the Washington Metropolitan Area Transit Authority (WMATA)

Dear Chairman Mendelson:

The region's six-year Transportation Improvement Program (TIP) outlines the schedule for obligating federal funds to state and local projects. The purpose of this amendment is to modify project budgets and sources of funds in the TIP for FY 2016 in order to match those in WMATA's FY 2016 grant applications that will be submitted to the Federal Transit Administration (FTA).

Attachment A is a summary of the proposed FY 2016 project budgets and funding-source information for this TIP amendment. These funding sources include only new federal and local funds and exclude funding that will be carried forward from prior years. Attachment B shows the FY 2016 project budgets that are part of the currently adopted TIP as well as the proposed changes to each budget. The TIP's overall FY 2016 capital program for WMATA would be decreased from \$1,176.6 million to \$861.1 million, reflecting the availability of federal, state and local funds, including the federal funds authorized under the Passenger Rail Investment and Improvement Act of 2008 (PRIIA), and the funding to match the federal funds. WMATA's original capital program of \$1,176.6 million included the issuance of \$300 million of debt; WMATA no longer plans to issue debt in FY2016, so therefore all projects have been adjusted accordingly to reflect the lower available funding. These TIP projects do not affect the currently approved air quality conformity analysis because these projects are either exempt or not regionally significant in terms of air quality.

WMATA's submission for this FY 2015-2020 TIP amendment is structured into nine major categories, with 13 individual capital programs, as shown in Attachment A. The FY 2015-2020 capital projects and funding levels shown are consistent with the FY 2016-2021 CIP that was approved by the WMATA Board on May 28, 2015.

**Washington
Metropolitan Area
Transit Authority**

600 Fifth Street, NW
Washington, D.C. 20001
202/962-1234

*By Metrorail:
Judiciary Square-Red Line
Gallery Place-Chinatown
Red, Green and
Yellow Lines*

*A District of Columbia
Maryland and Virginia
Transit Partnership*

Prior to approval of the CIP, WMATA held public hearings on its proposed operating and capital budgets, including the proposed sources and uses of its capital funds.

In addition to the requirement of consistency with an approved TIP, the FTA requires that agency grant applications match the corresponding State Transportation Improvement Program (STIP) for that agency. WMATA's TIP is considered part of the District of Columbia's STIP. If approved by the Transportation Planning Board, WMATA will request that this amendment be reflected in the District of Columbia's STIP as soon as possible, to enable the FTA review.

WMATA requests that the Transportation Planning Board Steering Committee approve this amendment at its June 5, 2015 meeting.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas Webster". Below the signature, the word "FOR" is written in a smaller, simpler font.

Thomas Webster
Managing Director
Office of Management and Budget Services

Attachments

FY16 Project Budgets Summary

Attachment A
(In Millions)

Category	TIP Sub-Category	FY2016 Total	Federal 5307 Grants	Federal 5337 Grants	Federal 5339 Grants	Federal PRIIA Grants	Federal 5309-B Grants	Federal 5324 Grants	Federal 5317 Grants	TIGER	VA CMAQ	Local Funding	Other Sources Non-Fed
A. Vehicles / Vehicle Parts	Rail Cars - Replacement, Rehabilitation & Enhancements	\$265.0	\$43.1	\$20.6	\$0.0	\$179.8	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$12.4	\$9.1
	Buses - Replacement, Rehabilitation & Enhancements	145.5	92.8	10.4	12.1	0.0	0.0	0.0	0.0	0.0	30.2	0.0	0.0
	Access & Service Vehicles	10.9	10.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8	0.0
B. Rail System Infrastructure Rehabilitation	Rail System Infrastructure Rehabilitation	127.9	0.0	24.3	0.0	61.2	0.0	4.5	0.0	0.0	0.0	20.0	17.7
C. Maintenance Facilities	Bus Garages - Systemwide Maintenance, Expansion, Rehabilitation, and Replacement	35.0	28.3	5.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.5	0.9
	Rail Yards - Systemwide Maintenance, Expansion, Rehabilitation, and Replacement	0.4	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Facilities Maintenance Support - Systemwide Support Equipment, Environmental Compliance Projects, and Administrative Support	24.5	0.0	3.5	0.0	5.2	0.0	0.0	0.0	0.0	0.0	14.6	1.2
D. Systems and Technology	Systems and Technology	65.5	0.0	6.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	32.1	26.6
E. Track and Structures	Track and Structures	59.6	0.0	16.4	0.0	43.1	0.0	0.0	0.0	0.0	0.0	0.2	0.0
F. Passenger Facilities	Passenger Facilities	85.8	3.3	71.4	0.0	0.0	1.9	0.0	1.2	1.2	0.0	6.8	0.0
G. Maintenance Equipment	Maintenance Equipment	14.2	3.1	2.4	0.0	7.6	0.0	0.0	0.0	0.0	0.0	1.1	0.0
H. Other Facilities	Other Facilities	11.7	2.5	2.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.8	0.8
I. Project Management and Support	Project Management and Support	15.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	15.0	0.0
	Total Capital Improvement Plan	\$861.1	\$183.2	\$164.2	\$12.1	\$297.0	\$1.9	\$4.5	\$1.2	\$1.2	\$30.2	\$109.3	\$56.3

FY16 Revised Budget

Attachment B
(In Millions)

Category	TIP Sub-Category	Approved FY 2016 TIP Budget	Proposed FY 2016 TIP Budget	\$ Change	% Change
A. Vehicles / Vehicle Parts	Rail Cars - Replacement, Rehabilitation & Enhancements	\$361.2	\$265.0	(\$96.2)	-26.6%
	Buses - Replacement, Rehabilitation & Enhancements	145.4	145.5	0.2	0.1%
	Access & Service Vehicles	20.9	10.9	(10.0)	-47.8%
B. Rail System Infrastructure Rehabilitation	Rail System Infrastructure Rehabilitation	92.0	127.9	35.8	39.0%
C. Maintenance Facilities	Bus Garages - Systemwide Maintenance, Expansion, Rehabilitation, and Replacement	72.7	35.0	(37.7)	-51.8%
	Rail Yards - Systemwide Maintenance, Expansion, Rehabilitation, and Replacement	31.7	0.4	(31.2)	-98.6%
	Facilities Maintenance Support - Systemwide Support Equipment, Environmental Compliance Projects, and Administrative Support	16.6	24.5	7.9	47.2%
D. Systems and Technology	Systems and Technology	116.1	65.5	(50.6)	-43.6%
E. Track and Structures	Track and Structures	68.6	59.6	(8.9)	-13.0%
F. Passenger Facilities	Passenger Facilities	145.7	85.8	(59.9)	-41.1%
G. Maintenance Equipment	Maintenance Equipment	84.2	14.2	(70.0)	-83.1%
H. Other Facilities	Other Facilities	18.1	11.7	(6.4)	-35.3%
I. Project Management and Support	Project Management and Support	3.5	15.0	11.5	328.1%
Total Capital Improvement Plan		\$1,176.6	\$861.1	(\$315.5)	-26.8%

**WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY
TRANSPORTATION IMPROVEMENT PROGRAM
CAPITAL COSTS (in \$1,000)**

FY 2015 - 2020

Source	Fed/St/Loc	Previous Funding	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	Source Total	
Transit										
Maintenance Equipment										
TIP ID: 5861	Agency ID:	Title: Maintenance Equipment								Complete:
Facility:	Local	0/0/100	4,300 e	1,092 e	58,414 e	41,428 e	35,820 e	15,805 e	156,858	
From:	PRIIA	50/0/50	24,290 e	7,646 e	20,409 e					52,344
To:	Sect. 5307	80/0/20	3,145 e	3,067 e	1,788 e	3,665 e				11,664
	Sect. 5337 - SGR	80/0/20	5,569 e	2,393 e	3,833 e	3,627 e	9,512 e	12,224 e	37,157	
	Sect. 5339	80/0/20				1,761 e				1,761
									Total Funds: 259,783	

Description: Provides funds for

- a. Rail Maintenance Equipment: purchase and/or replacement of equipment to maintain the rail system.
- b. Bus Repair Equipment: purchase and/or replacement of repair equipment.
- c. Business Facilities Equipment: purchase and/or replacement of equipment that supports the business process of the agency.

Modification: Update FY15 Project Information Nov. 2014	Approved on: 12/22/2014
Update FY15 Project Information Nov. 2014	
Amendment: Update FY16 Project Information May 2015	Approved on: 6/5/2015
Update FY16 Project Information May 2015	

**WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY
TRANSPORTATION IMPROVEMENT PROGRAM
CAPITAL COSTS (in \$1,000)**

FY 2015 - 2020

Source	Fed/St/Loc	Previous Funding	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	Source Total
Maintenance Facilities									
TIP ID: 5867	Agency ID:	Title: Facilities Maintenance Support – Systemwide Support Equipment, Environmental Compl						Complete:	
Facility:	DHS	100/0/0	10,613 e						10,613
From:	Local	0/0/100	33,835 e	14,579 e	5,519 e	5,792 e	6,651 e	7,830 e	74,206
To:	PRIIA	50/0/50	15,861 e	5,210 e					21,071
	Sect. 5307	80/0/20			3,165 e	2,500 e	3,000 e	3,000 e	11,665
	Sect. 5337 - SGR	80/0/20		3,519 e					3,519
	WIP	0/0/100		1,185 e					1,185
Total Funds:									122,260

Description: Provides funds for:

- a. Environmental Compliance Projects: facility or equipment upgrades and/or replacements required to comply with environmental regulatory requirements or directives.
- b. Maintenance Bus & Rail Facilities: upgrades, rehabilitation, and/or replacements of systemwide support equipment, financial planning and project administration, to include a new test track, railcar commissioning facility and New Carrollton Yard capacity improvements.

Modification: Update FY15 Project Information Nov. 2014	Approved on: 12/22/2014
Update FY15 Project Information Nov. 2014	
Amendment: Update FY16 Project Information May 2015	Approved on: 6/5/2015
Update FY16 Project Information May 2015	

TIP ID: 5866	Agency ID:	Title: Rail Yards - Systemwide Maintenance, Expansion, Rehabilitation and Replacement						Complete:	
Facility:	PRIIA	50/0/50	26,793 e		21,568 e	13,231 e			61,592
From:	Sect. 5337 - SGR	80/0/20		442 e					442
To:									
Total Funds:									62,034

Description: Provides funds for

- a. Maintenance of Rail Yards: maintenance and/or rehabilitation of rail maintenance yards.
- b. Rail Maintenance Facilities: construction and/or replacement of rail maintenance facilities.

Modification: Update FY15 Project Information Nov. 2014	Approved on: 12/22/2014
Update FY15 Project Information Nov. 2014	
Amendment: Update FY16 Project Information May 2015	Approved on: 6/5/2015
Update FY16 Project Information May 2015	

**WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY
TRANSPORTATION IMPROVEMENT PROGRAM
CAPITAL COSTS (in \$1,000)**

FY 2015 - 2020

Source		Fed/St/Loc	Previous Funding	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	Source Total	
TIP ID: 5857 Agency ID:		Title: Bus Garages - Systemwide Maintenance, Expansion, Rehabilitation, and Replacement							Complete:		
Facility:	Local	0/0/100		377 e	466 e	42,866 e	18,852 e	11,469 e	8,000 e	82,030	
From:											
To:	Sect. 5307	80/0/20		9,862 e	28,288 e	5,000 e	19,189 e	13,032 e	8,500 e	83,870	
	Sect. 5337 - SGR	80/0/20		6,640 e	5,315 e					11,955	
	WIP	0/0/100			941 e					941	
										Total Funds: 178,796	

Description: Provides funds for:

- a. Rehabilitation and Replacement of Bus Garages: upgrades, rehabilitation, and/or replacement of bus garages and maintenance facilities, including the rehabilitation of the Bladensburg bus facility and the replacement of the Southern Avenue, Royal Street (Cinder Bed Road), Shepard Parkway bus garages.
- b. Maintenance of Bus Garages: maintenance of bus garages/maintenance facilities.
- c. Expansion of Bus Garages: expansion of bus garages to meet storage and maintenance needs of growing fleet.

Amendment: Update FY16 Project Information May 2015

Approved on: 6/5/2015

Update FY16 Project Information May 2015

Other Facilities

TIP ID: 5862 Agency ID:		Title: Other Support Facilities							Complete:	
Facility:	Local	0/0/100		4,662 e	5,842 e	12,644 e	15,430 e	3,284 e	6,100 e	47,961
From:										
To:	Sect. 5307	80/0/20		8,776 e	2,507 e	5,625 e	1,733 e	5,000 e		23,641
	Sect. 5337 - SGR	80/0/20		1,826 e	2,597 e			2,555 e		6,977
	WIP	0/0/100			775 e					775
										Total Funds: 79,354

Description: Provides funds for:

- a. Business Support Facilities: facilities that support business operations functions.
- b. Metro Transit Police Department (MTPD) Support Facilities Rehabilitation: upgrade and rehabilitation of MTPD facilities.
- c. MTPD Support Facilities Expansion: expansion of MTPD to meet new ridership and facility demands, to include the new District 2, police training facility, and special operations division facility.

Modification: Update FY15 Project Information Nov. 2014

Approved on: 12/22/2014

Update FY15 Project Information Nov. 2014

Amendment: Update FY16 Project Information May 2015

Approved on: 6/5/2015

Update FY16 Project Information May 2015

**WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY
TRANSPORTATION IMPROVEMENT PROGRAM
CAPITAL COSTS (in \$1,000)**

FY 2015 - 2020

Source		Fed/St/Loc	Previous Funding	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	Source Total
Passenger Facilities										
TIP ID: 5860	Agency ID:	Title: Passenger Facilities							Complete:	
Facility:	ARRA/TIGER	100/0/0		5,508 e	1,195 e					6,703
From:	ARRA/TIGER	80/0/20		5,508 e	1,195 e					6,703
To:	Local	0/0/100		7,830 e	6,837 e	13,923 e	5,129 e	2,715 e	2,992 e	39,424
	PRIIA	50/0/50		47,482 e			23,021 e	32,438 e	36,696 e	139,637
	Sect. 5307	80/0/20		4,468 e	3,321 e	17,232 e	6,231 e	2,741 e	4,643 e	38,635
	Sect. 5309-B	80/0/20		1,048 e	1,875 e					2,923
	Sect. 5317	80/0/20			1,245 e					1,245
	Sect. 5337 - SGR	80/0/20		48,122 e	71,357 e	67,185 e	91,951 e	91,065 e	64,644 e	434,324
Total Funds:										662,892

Description: Provides funds for

- a. Elevator/ Escalator Facilities: rehabilitation of elevator and escalators and expansion of elevator capacity.
- b. Maintenance of Rail Station Facilities: upgrade, rehabilitation, and/or replacement of station area components.
- c. Bicycle/ Pedestrian Facilities: rehabilitation, replacement and expansion of bicycle and pedestrian facilities.
- d. Rail Station Capacity/ Enhancements: expand the capacity of rail stations, improve passenger access, and protect exposed assets.
- e. Bus Priority Corridor Improvements: bus stops, runningway enhancements, street operations management and safety strategies to produce more reliable bus.
- f. Rail Station Equipment: purchase of equipment to be used in rail stations, including police emergency management equipment and other related.

Modification: Update FY15 Project Information Dec. 2014	Approved on: 12/22/2014
Update FY2015 Project Funding for ARRA/TIGER for \$.524million Local and \$.524 Federal Dec. 2014.	
Update FY15 Project Information Nov. 2014	
Amendment: Update FY16 Project Information May 2015	Approved on: 6/5/2015
Update FY16 Project Information May 2015	

**WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY
TRANSPORTATION IMPROVEMENT PROGRAM
CAPITAL COSTS (in \$1,000)**

FY 2015 - 2020

Source		Fed/St/Loc	Previous Funding	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	Source Total
Project Management and Support										
TIP ID: 5863	Agency ID:	Title: Credit Facility							Complete:	
Facility:	Local	0/0/100		3,250 e	14,983 e	2,500 e	3,500 e	2,500 e	2,500 e	29,233
From:	Sect. 5307	0/0/0				1,000 e		1,500 e		2,500
To:	Sect. 5307	80/0/20				1,000 e		1,500 e		2,500
	Sect. 5339	80/0/20							1,500 e	1,500
Total Funds:										33,233

Description: Provides funds to maintain a line of credit to meet cash flow needs.

Modification: Update FY15 Project Information Nov. 2014	Approved on: 12/22/2014
Update FY15 Project Information Nov. 2014	
Amendment: Update FY16 Project Information May 2015	Approved on: 6/5/2015
Update FY16 Project Information May 2015	

Rail System Infrastructure Rehabilitation										
TIP ID: 5856	Agency ID:	Title: Rail Line Segment Rehabilitation							Complete:	
Facility:	Local	0/0/100			20,020 e	27,250 e				47,270
From:	PRIIA	50/0/50		59,918 e	61,236 e	43,670 e	40,582 e	45,722 e	64,632 e	315,760
To:	Sect. 5337 - SGR	80/0/20		9,800 e	24,349 e	4,750 e	9,000 e	4,873 e		52,772
	Section 5324	75/0/25		4,260 e	4,516 e	8,208 e	3,752 e			20,736
	WIP	0/0/100			17,736 e					17,736
Total Funds:										454,274

Description: Provides funds for rehabilitation of segments of Metrorail system, particularly the Red, Orange and Blue lines.

Modification: Update FY15 Through FY18 Project Information to Include Section 5324 Funding	Approved on: 12/22/2014
Update FY2015 through FY2018 to include \$7.000 million in Local Funding and \$21.000 million in Section 5324 Funding. Update FY15 Project Information Nov. 2014	
Amendment: Update FY16 Project Information May 2015	Approved on: 6/5/2015
Update FY16 Project Information May 2015	

**WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY
TRANSPORTATION IMPROVEMENT PROGRAM
CAPITAL COSTS (in \$1,000)**

FY 2015 - 2020

Source	Fed/St/Loc	Previous Funding	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	Source Total	
Systems and Technology										
TIP ID: 5858	Agency ID:	Title: Systems and Technology								Complete:
Facility:	Local	0/0/100	126,511 e	32,119 e	82,224 e	69,312 e	58,602 e	61,300 e	430,068	
From:	Sect. 5307	80/0/20	16,789 e		7,270 e	3,075 e		10,691 e	37,825	
To:	Sect. 5337 - SGR	80/0/20	18,369 e	6,823 e		6,872 e	38,035 e	23,784 e	93,883	
	WIP	0/0/100		26,550 e					26,550	
									Total Funds: 591,172	

Description: Provides funds for

- a. Rail Power Systems: upgrade of rail system's power supply.
- b. Operations Support Software: purchase and/or replacement of software that supports the transit system.
- c. Business Support Software & Equipment: purchase and/or replacement of software and equipment that supports the agency's mission.
- d. Rail Fare Equipment: purchase and/or replacement of fare equipment for the transit system.

Modification: Update FY15 Project Information Nov. 2014	Approved on: 12/22/2014
Update FY15 Project Information Nov. 2014	
Amendment: Update FY16 Project Information May 2015	Approved on: 6/5/2015
Update FY16 Project Information May 2015	

Track & Structures										
TIP ID: 5859	Agency ID:	Title: Track and Structures								Complete:
Facility:	Local	0/0/100	1,500 e	161 e			64 e		1,725	
From:	PRIIA	50/0/50	51,939 e	43,097 e	4,584 e	50,628 e	63,402 e	56,798 e	270,447	
To:	Sect. 5337 - SGR	80/0/20	20,567 e	16,373 e	66,738 e	28,491 e	18,138 e	28,513 e	178,819	
									Total Funds: 450,990	

Description: Provides funds for:

- a. Track Rehabilitation: maintain and rehabilitate track and track infrastructure including aerial structures.
- b. Station/Tunnel Rehabilitation: repair of water leaks in stations, vent shafts, air ducts, tunnels, tunnel liners, and other areas in the system.

Modification: Update FY15 Project Information Nov. 2014	Approved on: 12/22/2014
Update FY15 Project Information Nov. 2014	
Amendment: Update FY16 Project Information May 2015	Approved on: 6/5/2015
Update FY16 Project Information May 2015	

**WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY
TRANSPORTATION IMPROVEMENT PROGRAM
CAPITAL COSTS (in \$1,000)**

FY 2015 - 2020

Source	Fed/St/Loc	Previous Funding	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	Source Total	
Vehicles/ Vehicle Parts										
TIP ID: 5855	Agency ID:	Title: MetroAccess and Service Vehicles								Complete:
Facility:	Local	0/0/100		760 e	21,937 e		24,319 e		47,016	
From:										
To:	Sect. 5307	80/0/20	19,407 e	10,138 e		22,907 e		25,119 e	77,571	
									Total Funds: 124,588	

Description: Provides funds for
a. MetroAccess Vehicles: purchase/ replacement of Metro Access vehicles.
b. Replacement of Service Vehicles: purchase/ replacement of vehicles that will be used Authority-wide for service activities.

Amendment: Update FY16 Project Information May 2015	Approved on: 6/5/2015
Update FY16 Project Information May 2015	

TIP ID: 5854	Agency ID:	Title: Buses - Replacement, Rehabilitation, Expansion, & Enhancements								Complete:
Facility:	CMAQ	80/0/20		30,218 e	808 e	6,911 e	7,399 e	4,500 e	49,836	
From:										
To:	Local	0/0/100	6,067 e		202 e	1,728 e	5,211 e	38,483 e	51,690	
	Sect. 5307	80/0/20	121,475 e	92,812 e	121,600 e	124,866 e	156,046 e	132,212 e	749,012	
	Sect. 5337 - SGR	80/0/20		10,431 e	4,283 e	4,283 e	4,283 e	4,283 e	27,563	
	Sect. 5339	80/0/20	12,183 e	12,076 e	10,438 e	12,199 e	12,199 e	10,699 e	69,793	
									Total Funds: 947,894	

Description: Provides funds for
a. Replacement of Buses: replacement of the bus fleet.
b. Rehabilitation of Buses: mid-life rehabilitation of the bus fleet.
c. Bus Enhancements: purchase and/or replacement of equipment that upgrades or enhances the capability of the bus fleet.
d. Bus Fleet Expansion: expansion of the bus fleet to meet ridership growth.

Modification: Update FY15 Project Information Nov. 2014	Approved on: 12/22/2014
Update FY15 Project Information Nov. 2014	
Amendment: Update FY16 Project Information May 2015	Approved on: 6/5/2015
Update FY16 Project Information May 2015	

**WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY
TRANSPORTATION IMPROVEMENT PROGRAM
CAPITAL COSTS (in \$1,000)**

FY 2015 - 2020

Source		Fed/St/Loc	Previous Funding	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	Source Total	
TIP ID: 5853 Agency ID:		Title: Rail Cars - Replacement, Rehabilitation, Expansion, & Enhancements							Complete:		
Facility:	Local	0/0/100		3,229 e	12,435 e	214 e				15,877	
From:	PRIIA	50/0/50		70,718 e	179,811 e	209,769 e	172,539 e	158,438 e	141,875 e	933,149	
To:	Sect. 5307	80/0/20			43,059 e	21,485 e				64,544	
	Sect. 5337 - SGR	80/0/20		40,903 e	20,562 e	23,098 e	25,663 e	1,426 e	36,439 e	148,092	
	WIP	0/0/100		1,404 e	9,114 e					10,517	
										Total Funds: 1,172,179	

Description: Provides funds for:

- a. Replacement of Rail Cars: replacement of the rail fleet, including the 1000-Series and 4000-Series rail cars.
- b. Rehabilitation of Rail Cars: mid-life rehabilitation of rail fleet.
- c. Rail Fleet Expansion: expansion of the rail fleet to meet ridership growth.
- d. Rail Enhancements: enhancements to the rail fleet that improve safety, reliability, and passenger comfort.

Modification: Update FY15 Project Information Nov. 2014	Approved on: 12/22/2014
Update FY15 Project Information Nov. 2014	
Amendment: Update FY16 Project Information May 2015	Approved on: 6/5/2015
Update FY16 Project Information May 2015	

**NATIONAL CAPITAL REGION TRANSPORTATION PLANNING BOARD
777 North Capitol Street, N.E.
Washington, D.C. 20002**

**RESOLUTION ON AN AMENDMENT TO THE FY 2015-2020 TRANSPORTATION
IMPROVEMENT PROGRAM (TIP) THAT IS EXEMPT FROM THE AIR QUALITY
CONFORMITY REQUIREMENT TO INCLUDE FUNDING FOR SECTION 5310
CAPITAL AND OPERATING ASSISTANCE, AS REQUESTED BY
THE MARYLAND DEPARTMENT OF TRANSPORTATION (MDOT)**

WHEREAS, the National Capital Region Transportation Planning Board (TPB), which is the metropolitan planning organization (MPO) for the Washington Region, has the responsibility under the provisions of Moving Ahead for Progress in the 21st Century (MAP-21) for developing and carrying out a continuing, cooperative and comprehensive transportation planning process for the Metropolitan Area; and

WHEREAS, the TIP is required by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) as a basis and condition for all federal funding assistance to state, local and regional agencies for transportation improvements within the Washington planning area; and

WHEREAS, on October 15, 2014 the TPB adopted the FY 2015-2020 TIP; and

WHEREAS, in the attached letter of June 3, 2015, MDOT has requested that the FY 2015-2020 TIP be amended to include \$1.3 million in FTA Section 5310 and state matching funds for Capital and Operating Assistance, as described in the attached materials; and

WHEREAS, this project is exempt from the air quality conformity requirement, as defined in Environmental Protection Agency (EPA) regulations "40 CFR Parts 51 and 93 Transportation Conformity Rule Amendments: Flexibility and Streamlining; Final Rule," issued in the May 6, 2005, *Federal Register*;

NOW, THEREFORE, BE IT RESOLVED THAT the Steering Committee of the National Capital Region Transportation Planning Board amends the FY 2015-2020 TIP to include \$1.3 million in FTA Section 5310 and state matching funds for Capital and Operating Assistance, as described in the attached materials.

Adopted by the Transportation Planning Board Steering Committee at its regular meeting on June 5, 2015.



Maryland Department of Transportation
The Secretary's Office

Larry Hogan
Governor

Boyd Rutherford
Lt. Governor

Pete K. Rahn
Secretary

June 3, 2015

The Honorable Phil Mendelson, Chair
National Capital Region Transportation Planning Board
Metropolitan Washington Council of Governments
777 North Capitol Street, N.E., Suite 300
Washington DC 20002

Dear Chairman Mendelson:

The Maryland Department of Transportation (MDOT) requests an amendment to the Maryland Transit Administration (MTA) portion of the FY 2015-2020 Transportation Improvement Program (TIP) as described below and in the attached memo. MDOT is requesting that \$1.3 million in federal and local funding be added to the TIP for a new project entitled "5310 Operating and Capital" which will support seniors and individuals with disabilities. This program is exempt from the air quality conformity requirement.

TIP ID#	Project	Phase	Amount of New Funding
6440	5310 Operating and Capital	Other	\$1,298,000

MDOT requests that this amendment be approved by the Transportation Planning Board (TPB) Steering Committee on its June 5, 2015 meeting.

The revised funding status will not impact scheduling or funding availability for other projects in the current TIP, which continues to be fiscally constrained.

We appreciate your cooperation in this matter. If you have any questions or comments, please do not hesitate to contact Ms. Lyn Erickson, at 410-865-1279, toll-free at 888-713-1414 or via email at lerickson@mdot.state.md.us. Of course, please feel free to contact me directly. Thank you.

Sincerely,

Michael W. Nixon, Manager
Office of Planning and Capital Programming

My telephone number is _____
Toll Free Number 1-888-713-1414 TTY Users Call Via MD Relay
7201 Corporate Center Drive, Hanover, Maryland 21076

The Honorable Phil Mendelson
Page Two

Attachment

cc: Mr. Kevin Quinn, Director, Office of Planning & Programming, MTA
Ms. Lyn Erickson, Manager, Office of Planning and Capital Programming,
Maryland Department of Transportation
Ms. Heather Murphy, Deputy Director, Office of Planning and Capital Programming
Maryland Department of Transportation



MARYLAND TRANSIT ADMINISTRATION

MARYLAND DEPARTMENT OF TRANSPORTATION

Larry Hogan, Governor • Boyd Rutherford, Lt. Governor
Pete K. Rahn, Secretary • Paul Comfort, Administrator

MEMORANDUM

TO: Mr. Don Halligan, Director
MDOT Office of Planning and Capital Programming

ATTN: Mr. Mike Nixon, Manager
MDOT Office of Planning and Capital Programming

FROM: Mr. Kevin Quinn, Director *KQ*
MTA Office of Planning and Capital Programming

DATE: May 26, 2015

SUBJECT: Amendment to the Washington FY 2015- 2020 Transportation Improvement Program to add 5310 Capital and Operating Assistance

The Maryland Transit Administration (MTA) is requesting an amendment to the Washington Region FY 2014- 2020 Transportation Improvement Program (TIP) to add a new project, 5310 Capital and Operating Assistance.

Recently, this was included in the STIP only; however, under MAP21 the funds have been split up into multiple categories which now requires the MTA to include it in a TIP page as well.

After your review, please process the requested amendment with the Washington MPO Transportation Planning Board for inclusion in the FY 2015-2020 TIP. If you have any questions, please do not hesitate to contact Ms. Terri Lippa, MTA Office of Planning at 410-767-3759 or via email at Tlippa@mta.maryland.gov.

cc: Mr. Lyn Erickson, Regional Planner, Office of Planning, MDOT

**SUBURBAN MARYLAND
TRANSPORTATION IMPROVEMENT PROGRAM
CAPITAL COSTS (in \$1,000)**

FY 2015 - 2020

Source	Fed/St/Loc	Previous Funding	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	Source Total
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MDOT/Maryland Transit Administration

Transit

Seniors and Individuals with Disabilities

TIP ID: 6440	Agency ID:	Title: 5310 Operating and capital	Complete:	Total Cost:
Facility:	Sect. 5310	50/0/50	148 e	296
From:				
To:	Sect. 5310.	80/0/20	501 e	1,002
Total Funds:				1,298

Description: Will enhance mobility for seniors and individuals with disabilities by providing funds for programs to serve the special needs of transit-dependent populations beyond traditional public transportation services and ADA complementary paratransit services.

Amendment: New Project **Requested on: 6/5/2015**
Amend project into the TIP with \$1.298 million in Section 5310 funding for capital and operating.

NATIONAL CAPITAL REGION TRANSPORTATION PLANNING BOARD
777 North Capitol Street, N.E.
Washington, D.C. 20002

**RESOLUTION TO AMEND THE FY 2016 UNIFIED PLANNING
WORK PROGRAM (UPWP) TO INCLUDE FUNDING TO CONDUCT
A LONG DISTANCE COMMUTER BUS STUDY AS REQUESTED BY
THE VIRGINIA DEPARTMENT OF TRANSPORTATION (VDOT)**

WHEREAS, the National Capital Region Transportation Planning Board (TPB), which is the metropolitan planning organization (MPO) for the Washington Region, has the responsibility under the provisions of the Moving Ahead for Progress in the 21st Century (MAP-21) Act of 2012 for developing and carrying out a continuing, cooperative and comprehensive transportation planning process for the Washington Metropolitan Area; and

WHEREAS, the Joint Planning Regulations issued in February 2007 by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) require a Unified Planning Work Program for Transportation Planning (UPWP); and

WHEREAS, the UPWP is required as a basis and condition for all funding assistance for transportation planning to state, local, and regional agencies by the FHWA and FTA; and

WHEREAS, the FY 2016 UPWP for the Washington Metropolitan Area was approved by the TPB on March 18, 2015; and

WHEREAS, in the attached letter of May 29, 2015, the Virginia Department of Transportation (VDOT), has requested to include \$100,000 in funding under Virginia Technical Assistance for Regional and Sub-regional Studies to conduct a Long Distance Commuter Bus Study;

WHEREAS, it is now possible under this work activity with no change in the overall budget to conduct a Long Distance Commuter Bus Study during FY 2016;

NOW, THEREFORE, BE IT RESOLVED THAT the Steering Committee of the National Capital Region Transportation Planning Board amends the FY 2016 UPWP to include \$100,000 in funding under Virginia Technical Assistance for Regional and Sub-regional Studies to conduct a Long Distance Commuter Bus Study, as described in the attached materials.

Adopted by the Transportation Planning Board Steering Committee at its regular meeting on June 5, 2013

**NATIONAL CAPITAL REGION TRANSPORTATION PLANNING BOARD
777 North Capitol Street, N.E.
Washington, D.C. 20002**

**RESOLUTION ON AN AMENDMENT TO
THE FY 2015-2020 TRANSPORTATION IMPROVEMENT PROGRAM (TIP)
THAT IS EXEMPT FROM THE AIR QUALITY CONFORMITY REQUIREMENT
TO INCLUDE FUNDING FOR PRELIMINARY ENGINEERING FOR
THE I-66 OUTSIDE THE BELTWAY PROJECT, AS REQUESTED BY
THE VIRGINIA DEPARTMENT OF TRANSPORTATION (VDOT)**

WHEREAS, the National Capital Region Transportation Planning Board (TPB), which is the metropolitan planning organization (MPO) for the Washington Region, has the responsibility under the provisions of Moving Ahead for Progress in the 21st Century (MAP-21) for developing and carrying out a continuing, cooperative and comprehensive transportation planning process for the Metropolitan Area; and

WHEREAS, the TIP is required by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) as a basis and condition for all federal funding assistance to state, local and regional agencies for transportation improvements within the Washington planning area; and

WHEREAS, on October 15, 2014 the TPB adopted the FY 2015-2020 TIP; and

WHEREAS, in the attached letter of June 2, 2015, VDOT has requested that the FY 2015-2020 TIP be amended to include \$38.106 million in Advanced Construction (AC) funding, and \$3.185 million in AC Conversion funding for Preliminary Engineering for the I-66 Outside the Beltway project, as described in the attached materials; and

WHEREAS, funding for preliminary engineering only is exempt from the air quality conformity requirement, as defined in Environmental Protection Agency (EPA) regulations "40 CFR Parts 51 and 93 Transportation Conformity Rule Amendments: Flexibility and Streamlining; Final Rule," issued in the May 6, 2005, *Federal Register*;

NOW, THEREFORE, BE IT RESOLVED THAT the Steering Committee of the National Capital Region Transportation Planning Board amends the FY 2015-2020 TIP to include \$38.106 million in AC funding, and \$3.185 million in AC Conversion funding for Preliminary Engineering for the I-66 Outside the Beltway project, as described in the attached materials.

Adopted by the Transportation Planning Board Steering Committee at its regular meeting on June 5, 2015.



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION

4975 Alliance Drive
Fairfax, VA 22030

CHARLES A. KILPATRICK, P.E.
COMMISSIONER

June 2, 2015

The Honorable Phil Mendelson, Chairman
National Capital Region Transportation Planning Board
Metropolitan Washington Council of Governments
777 North Capitol Street, N.E., Suite 300
Washington, DC 20002-4201

RE: National Capital Region FY 2015-2020 Transportation Improvement Program Amendment for TIP ID# 6347, I-66 Study (Outside the Beltway), VDOT UPC# 54911, 105239, 105500

Dear Chairman Mendelson:

The Virginia Department of Transportation (VDOT) requests an amendment to the FY 2015-2020 Transportation Improvement Program (TIP) to add funding for the environmental study for the I-66 Outside the Beltway Corridor Improvements Project. The amendment is needed to reflect the latest planned funding obligations and cost estimates for this study.

The amendment adds approximately \$41 million in Federal AC and AC Conversion funding to the TIP in FY 2015, 2016, and 2018 and updates the total cost estimate to \$55.66 million. VDOT staff has entered the proposed additional funding in the TPB's iTIP online database. While the proposed funds are new to the TIP, they are part of the total federal and state funding estimates included in VDOT's financial plan for the 2014 CLRP update. This amendment will not impact the regional air quality conformity analysis since all funds are being used for a study.

VDOT requests that this amendment be approved by the Transportation Planning Board's Steering Committee at its meeting on June 5, 2015. VDOT's representative will attend the meeting and will be available to answer any questions about the amendments.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in blue ink that reads 'Helen L. Cuervo'.

Helen L. Cuervo, P.E.
District Engineer
Northern Virginia District

cc: Ms. Renée Hamilton, VDOT-NoVA
Ms. Maria Sinner, P.E., VDOT-NoVA
Ms. Susan Shaw, P.E., VDOT-NoVA
Mr. Norman Whitaker, AICP, VDOT-NoVA

VirginiaDot.org
WE KEEP VIRGINIA MOVING

**NORTHERN VIRGINIA
TRANSPORTATION IMPROVEMENT PROGRAM
CAPITAL COSTS (in \$1,000)**

	Source	Fed/St/Loc	Previous Funding	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	Source Total
Interstate										
I-66 Study / Access Improvements(Outside the Beltway)										
TIP ID: 6347 Agency ID: 54911, 105239 , 1055 Title: I 66 Preliminary Engineering for EIS										Complete: 2017
Facility: I 66	AC	100/0/0		37,106 a			1,000 a			38,106
From: I 495										
To: VA 15	AC Conversion	100/0/0			3,185 a					3,185
Total Funds:										41,291

Description: PE only for I66 outside beltway

Amendment: Add New Project **Approved on: 6/5/2015**
 Amend this project into the TIP with \$37.106 million in Advanced Construction (AC) funding in FY 2015, \$3.185 million in AC Conversion funding in FY 2016 and \$1 million in AC funding in FY 2018.



NATIONAL CAPITAL REGION

TRANSPORTATION PLANNING BOARD

MEMORANDUM

June 11, 2015

To: Transportation Planning Board

From: Kanathur Srikanth
Director, Department of Transportation Planning

Re: Letters Sent/Received Since the May 20th TPB Meeting

The attached letters were sent/received since the May 20th TPB meeting. The letters will be reviewed under Agenda #5 of the June 17th TPB agenda.

Attachments



NATIONAL CAPITAL REGION TRANSPORTATION PLANNING BOARD

May 26, 2015

Mr. Anthony Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

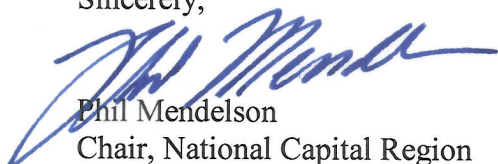
Dear Secretary Foxx:

I am writing to express the support of the National Capital Region Transportation Planning Board (TPB), the metropolitan planning organization (MPO) for the national capital region, for an application under the FY 2015 Transportation Investment Generating Economic Recovery (TIGER) Discretionary Grant Program.

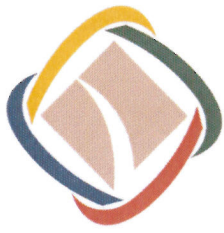
The United States Institute of Peace (USIP) Headquarters Pedestrian Access Project would provide improved accessibility to its new campus for visitors and pedestrians. The USIP Headquarters has a prominent position adjacent to the National Mall, and is in need of pedestrian improvements to safely connect its 50,000 annual visitors to its renovated training facilities on Navy Hill overlooking the Potomac River. This project is consistent with the National Capital Planning Commission's efforts to improve pedestrian connections in the Northwest Rectangle Sector of Washington, DC. The major institutions in this sector include USIP, the Kennedy Center, the U.S. State Department's new Diplomacy Center, the Vietnam Veterans Memorial Education Center, and the Lincoln Memorial.

The Transportation Planning Board supports these goals and appreciates your strong consideration of this application as it directly responds to regional transportation goals and priorities adopted by the Transportation Planning Board and identified in the Washington region's long-range transportation plan. I understand that upon successful grant award, the region's transportation improvement program (TIP) will be amended to include the grant funding.

Sincerely,



Phil Mendelson
Chair, National Capital Region
Transportation Planning Board



NATIONAL CAPITAL REGION TRANSPORTATION PLANNING BOARD

May 26, 2015

Mr. Anthony Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Dear Secretary Foxx:

I am writing to express the support of the National Capital Region Transportation Planning Board (TPB), the metropolitan planning organization (MPO) for the national capital region, for the City of Alexandria's application under the FY 2015 Transportation Investment Generating Economic Recovery (TIGER) Discretionary Grant Program.

The Potomac Yard Metrorail Station project will construct a new station on the existing Metrorail Blue and Yellow Lines between the Ronald Reagan Washington National Airport Metrorail Station and the Braddock Road Metrorail Station. This additional rapid transit access point is needed to address existing and future travel demand in the area resulting from the City of Alexandria's planned development of Potomac Yard, which will include a major transit-oriented, mixed-use activity center of more than 12 million square feet. The station will provide a rail transit option to residents, employees, and customers while helping to preserve open space and productive agricultural land on the outskirts of the region.

The Transportation Planning Board supports these goals and appreciates your strong consideration of this application as it directly responds to regional transportation goals and priorities adopted by the Transportation Planning Board and identified in the Washington region's long-range transportation plan. I understand that upon successful grant award, the region's transportation improvement program (TIP) will be amended to include the grant funding.

Sincerely,

Phil Mendelson
Chair, National Capital Region
Transportation Planning Board



NATIONAL CAPITAL REGION

TRANSPORTATION PLANNING BOARD

May 26, 2015

Mr. Anthony Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Dear Secretary Foxx:

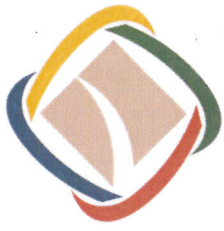
I am writing to express the support of the National Capital Region Transportation Planning Board (TPB), the metropolitan planning organization (MPO) for the national capital region, for Montgomery County's application under the FY 2015 Transportation Investment Generating Economic Recovery (TIGER) Discretionary Grant Program.

The Montgomery County MD 355 Ride On Plus Transit Improvements Project (ROP) will enable the implementation of a premium bus service with zero-emission vehicles, off-board fare collection, and transit signal priority, as well as complementary streetscape and bicycle / pedestrian improvements. The project would improve passenger transit mobility while connecting riders to major private and government job centers.

The Transportation Planning Board supports these goals and appreciates your strong consideration of this application as it directly responds to regional transportation goals and priorities adopted by the Transportation Planning Board and identified in the Washington region's long-range transportation plan. I understand that upon successful grant award, Montgomery County will provide the required local funding and operating match for this project. The region's transportation improvement program (TIP) will be amended to include the project upon award.

Sincerely,

Phil Mendelson
Chair, National Capital Region
Transportation Planning Board



NATIONAL CAPITAL REGION TRANSPORTATION PLANNING BOARD

May 26, 2015

Mr. Anthony Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Dear Secretary Foxx:

I am writing to express the support of the National Capital Region Transportation Planning Board (TPB), the metropolitan planning organization (MPO) for the national capital region, for Prince George's County's application under the FY 2015 Transportation Investment Generating Economic Recovery (TIGER) Discretionary Grant Program.

The Ager Road/West Hyattsville Transit Access Project will implement a comprehensive Green Street/Complete Street set of infrastructure improvements to improve safety and enhance mobility for all users of the transportation network, enhance community cohesiveness, encourage healthier living opportunities, and promote livable communities. It will create a welcoming and healthier environment with the addition of street trees and reduction of impervious area draining directly to the Anacostia River thereby providing improvements to water quality and quantity control and will promote continued economic development, both along the Ager Road corridor and near the West Hyattsville Metrorail station.

The Transportation Planning Board supports these goals and appreciates your strong consideration of this application as it directly responds to regional transportation goals and priorities adopted by the Transportation Planning Board and identified in the Washington region's long-range transportation plan. I understand that upon successful grant award, the region's transportation improvement program (TIP) will be amended to include the grant funding.

Sincerely,

Phil Mendelson
Chair, National Capital Region
Transportation Planning Board



NATIONAL CAPITAL REGION

TRANSPORTATION PLANNING BOARD

MEMORANDUM

June 11, 2015

To: Transportation Planning Board

From: Kanathur Srikanth
Director, Department of Transportation Planning

Re: Announcements and Updates

The attached documents provide updates on activities that are not included as separate items on the TPB agenda.



NATIONAL CAPITAL REGION

TRANSPORTATION PLANNING BOARD

Item #5

MEMORANDUM

DATE: June 11, 2015

TO: Transportation Planning Board

FROM: Kanti Srikanth,
Director, Department of Transportation Planning

SUBJECT: Briefing the Board on follow up actions related to the January 12, 2015 Metrorail L'Enfant Plaza smoke incident.

SUMMARY:

This memorandum updates the activities taken by the Metropolitan Washington Council of Governments (COG) and a number of its public safety committees and by the Washington Metropolitan Area Transit Authority (WMATA) subsequent to the January 12, 2015 Metrorail L'Enfant Plaza smoke incident.

BACKGROUND:

During its January 21, 2015 meeting the Board engaged in a brief discussion of the fatal incident on the Yellow line of the Metro rail at the L'Enfant Plaza station on Jan. 12, 2015. Given the Board's association with regional transit projects and its interest in and long standing support for the Metrorail system it was decided that the TPB's Steering Committee would stay engaged in monitoring the developments related to this incident. The Steering Committee was charged with keeping the Board apprised of: (1) the developments related to the Jan. 12, 2015 event, (2) any recommendations for actions that the Transportation Planning Board (TPB) would have to take, and (3) any information needed to inform the TPB as to how it can remain engaged with or offer support for the Metrorail system.

The Steering Committee discussed the matter during its February and March meetings and reported to the Board via two separate memos. In April, the Board was briefed by Mr. Stuart Freudberg, COG's Deputy Executive Director, and by Mr. Robert Troup, WMATA Deputy General Manager for Operations on the actions WMATA and COG Committees had taken actions to date.

[April 2015 Briefing to the Board on Actions subsequent to the January 12 L'Enfant Plaza smoke incident](#)

RECENT ACTIVITIES:

1. National Transportation Safety Board (NTSB) - Safety Recommendation

On June 8, 2015, the National Transportation Safety Board (NTSB) issued an urgent Safety Recommendation to WMATA regarding third rail power supply electrical connections. The ongoing investigation has found some of these electrical connections were improperly constructed and installed, while others are missing “sealing sleeves”. These conditions can create the potential for electrical short circuiting. Accordingly, NTSB has asked WMATA to promptly develop and implement a program to ensure that all power cable connector assemblies are constructed and installed in accordance with specifications.

The safety recommendation letter is available at:

<http://www.nts.gov/safety/safety-recs/RecLetters/R-15-025.pdf>

Senator Barbara Mikulski (D-MD) issued a letter (*attached*) the same day calling on WMATA “to fix it and fix it now.”

The region’s congressional delegation issued a letter (*attached*) on June 9 requesting immediate WMATA action on the cable connector issue, including the following items.

1. A system-wide accounting of power cable connector assemblies that do not include sealing sleeves or other proper components in accordance with WMATA design specifications;
2. An explanation of how and why installations were performed without the sealing sleeves, an explanation for why WMATA has no system of quality control in place for this work, and what corrective actions will be taken to correct this situation; and
3. A comprehensive timeline and cost estimate for fixing this issue throughout the system.

2. NTSB Investigative Hearing: WMATA Smoke and Electrical Arcing Accident

The National Transportation Safety Board will hold an investigative hearing on June 23 and 24 to discuss the ongoing investigation into the January 12 smoke and electrical arcing accident that occurred near the L’Enfant Plaza Metro Station. Agenda items include

- Conditions leading to the arcing
- Emergency response efforts
- WMATA’s efforts to improve its overall safety and safety culture (since the Fort Totten accident in June 2009)
- The state of WMATA’s infrastructure
- The Federal Transit Administration’s rulemaking on public transportation safety
- The Tri-State Oversight Committee’s oversight responsibilities

The agenda is available here:

http://www.nts.gov/news/events/Pages/2015_WMATA_Washington_DC_IHG_Agenda.aspx

The hearings will webcast live, with a copy available after the event. A link to the webcast site is available at <http://www.capitolconnection.net/capcon/nts/nts.htm>

3. COG and WMATA Metrorail Safety Coordination Update

At the June 10 COG Board of Directors meeting, COG Fire Chiefs Committee Chairman Marc Bashoor (Prince George's County) and COG's Deputy Executive Director Stuart Freudberg spoke about ongoing coordination between WMATA and COG following the January 12 incident.

Their presentation included:

- Background on COG and WMATA coordination
- Agenda and sessions for the NTSB investigative hearing
- Metrorail Transit Fire/Rescue Emergency Procedures Policy Agreement
 - Goal is to sign a new agreement in June 2015.
 - Major policy agreement elements include:
 - Public Safety Radio Testing Protocol
 - Regional Metrorail Training Plan
 - Fire/Rescue Liaison at WMATA's ROCC
 - Incident Command Post
 - Emerging Operational Trends and Issues
 - Steps to finalize the Agreement
- Metrorail Communications Study: objectives, tasks and preliminary draft findings.

[June COG Board Briefing: COG and WMATA Safety Coordination](#)

XXX

United States Senate
WASHINGTON, DC 20510-2003

June 8, 2015

Mr. Mortimer L. Downey
Chair
Board of Directors
Washington Metropolitan Area Transit Authority
600 5th Street, N.W.
Washington, DC 20001

Dear Mr. Downey:

I was shocked and deeply dismayed to read the National Transportation Safety Board (NTSB) findings released today.

Time and time again, the NTSB brings us unacceptable reports about Metro's safety and management.

According to NTSB's report, "Investigators found that some electrical connections associated with the power supply to the third rail were improperly constructed and installed, which can allow moisture and contaminants to enter the components. Such conditions can create the potential for electrical short circuiting, which could result in fire and smoke events in the Washington Metropolitan Area Transit Authority system."

Today's NTSB recommendation calls for immediate action. So do I. I call on you to fix it and fix it now.

Sincerely,



Barbara A. Mikulski
United States Senator

Congress of the United States

Washington, DC 20515

June 9, 2015

Mr. Jack Requa
Interim General Manager
Washington Metropolitan Area Transit Authority
600 5th Street NW
Washington, D.C. 20001

Dear Mr. Requa,

We are deeply disturbed by the circumstances that led to this week's National Transportation Safety Board (NTSB) recommendations to the Washington Metropolitan Area Transit Authority (WMATA) for immediate action to ensure that all power cable connector assemblies are properly constructed and installed in accordance with WMATA's own engineering design specifications. The recommendation issued by NTSB highlights an unacceptable condition in which numerous flaws and inconsistencies with the installation of the connectors have been allowed to persist throughout the system without any oversight or quality control.

According to the NTSB report, cable connectors are required to be installed with sealing sleeves to ensure that the connector assemblies are weather-tight and prevent contamination that can lead to a short circuit, which can produce smoke and fire within the system tunnels. However, NTSB has found many assemblies installed without this critical component, "often with heat shrinking tubing or electrical tape used in place of sealing sleeves; and with different types of terminal lugs, some of which are not specified for use with their connector covers."

NTSB investigators found the cable connector assembly involved in the February 11, 2015, arcing incident at Court House Station on the Orange Line "was missing its sealing sleeves." While the cable connectors in the January 12, 2015, fatal incident at L'Enfant Plaza on the Yellow Line were too charred to offer conclusive evidence, the NTSB notes that the post-accident repairs "did not include the sealing sleeves." In addition to the lack of uniform installation that adheres to WMATA design specifications, NTSB reports that WMATA "does not have a program to ensure that power cable connector assemblies are installed in accordance with its engineering design specifications." With connectors in place every few hundred feet along miles of metro track, this lack of oversight is unacceptable.

We are appalled that riders' lives may have been put at risk simply because a small, yet critical component of the power cable connectors was not installed as required by the manufacturer's directions and WMATA engineering specifications. Problems arising from aging infrastructure may be understandable, but WMATA must explain how a failure to follow basic assembly instructions has been allowed to persist.

In the wake of this latest NTSB report, we request the following:

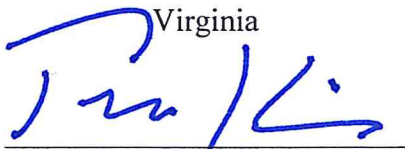
1. A system-wide accounting of power cable connector assemblies that do not include sealing sleeves or other proper components in accordance with WMATA design specifications;
2. An explanation of how and why installations were performed without the sealing sleeves, an explanation for why WMATA has no system of quality control in place for this work, and what corrective actions will be taken to correct this situation; and
3. A comprehensive timeline and cost estimate for fixing this issue throughout the system.

WMATA has spent considerable time and money working on the system upgrades that are necessary to maintain safety and reliability, and the federal government has made significant investments in those efforts. We, and our constituents, expect WMATA to provide robust oversight and exercise strict accountability to ensure this work is done properly, in accordance with WMATA's own standards. Immediate action must be taken to protect the safety of all riders and ensure that we do not have repeated incidents. We ask for your swift attention to this inquiry and request a response addressing these and any other issues associated with this latest NTSB recommendation within 30 days. We will continue to work closely with you and the WMATA Board of Directors to resolve these issues.

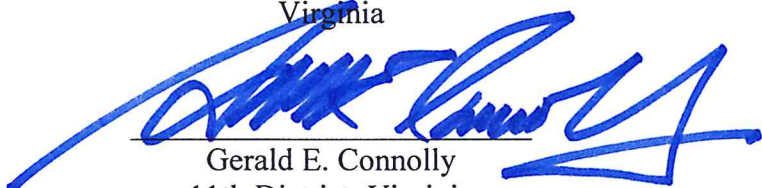
Sincerely,



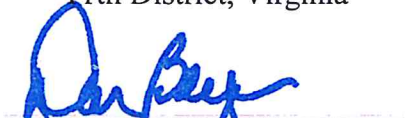
Mark R. Warner
Virginia



Timothy M. Kaine
Virginia



Gerald E. Connolly
11th District, Virginia



Donald S. Beyer Jr.
8th District, Virginia



Barbara Comstock
10th District, Virginia



John K. Delaney
6th District, Maryland



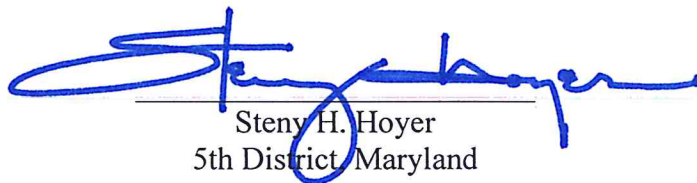
Barbara A. Mikulski
Maryland



Benjamin L. Cardin
Maryland



Chris Van Hollen
8th District, Maryland



Steny H. Hoyer
5th District, Maryland



Donna F. Edwards
4th District, Maryland



John P. Sarbanes
3rd District, Maryland



Eleanor Holmes Norton
At-large, District of Columbia



NATIONAL CAPITAL REGION TRANSPORTATION PLANNING BOARD

MEMORANDUM

TO: National Capital Region Transportation Planning Board

FROM: Kanti Srikanth
Director, Plan Development and Data Programs
Department of Transportation Planning

SUBJECT: Testimony during hearing held by US Senate's Environment and Public Works Committee on June 3, 2015

DATE: June 17, 2015

On May 15, I was asked by the Executive Director of the Association of Metropolitan Planning Organizations (AMPO) if I would be willing to testify before the Senate's Environment and Public Works (EPW) Committee on the implications and implementation challenges of EPA's proposed ozone National Ambient Air Quality Standards (NAAQS) for states and communities across the United States. AMPO staff had been asked by the EPW Committee to recommend a member of their organization with direct experience in applying ozone NAAQS to transportation planning and programming activities to testify before the Committee. I agreed to the AMPO request, received a formal invitation from the Senate EPW Committee on May 27, 2015 and gave oral testimony before the Committee on June 3, 2015.

A copy of the invitation I received, text of the oral testimony I provided along with the written testimony submitted for the record are attached for your information. Archived Webcast of the complete hearing may be found on the Senate EPW Committee's website (http://www.epw.senate.gov/public/index.cfm?FuseAction=Hearings.Hearing&Hearing_ID=e8bdf5b7-ef12-6b31-7742-107363d1a4a1).

The Senate EPW Committee is currently examining EPA's proposal to change the Ozone NAAQS standard from its current value of 75 ppb to a value in the range of 65 ppb to 70 ppb. I was told that the Committee members were interested in understanding the relationship between of the NAAQS for criteria pollutants and metropolitan transportation planning via transportation conformity analysis requirements. I was further informed that members of this Committee who were working on the Transportation Reauthorization Bill were also interested in understanding the transportation planning and programming implementation issues associated with changes to the ozone NAAQS.

When I accepted the invitation to speak to the EPW Committee I noted that I would not be testifying on proposed changes to the ozone NAAQS, the levels at which it should be set, the science behind it or other policy aspects. I informed AMPO and the Senate Committee staff

that the Transportation Planning Board has not taken an official position and hence my testimony would not be an official representation of the TPB. I also informed them that the Metropolitan Washington Air Quality Committee had taken a position on the proposed range of changes to the level of ozone NAAQS and that my testimony would note it but, I would not be officially representing MWAQC. AMPO also has commented to the EPA's docket on the proposed changes and I informed AMPO that I would note this and include AMPO's comments as part my testimony, but I would not be speaking to their comments.

I informed both AMPO and the Senate EPW Committee staff that my testimony would strictly be from a practitioner's perspective and draw from my experience and knowledge of the National Capital region with transportation conformity, transportation emissions reduction measures and what the anticipated implications would be on the region with regard to its attainment status with the proposed changes to the ozone NAAQS.

I was assisted by the Metropolitan Council of Government's Department of Environment and Executive staffs in preparing this testimony. I shared my written testimony with the officers of the TPB, chairman of MWAQC and representatives of the state DOTs and WMATA ahead of my testimony on June 3, 2015. The TPB's Technical and Steering Committees were briefed during their monthly meeting on June 5, 2015.

**ORAL TESTIMONY OF KANATHUR SRIKANTH ON BEHALF OF THE
ASSOCIATION OF METROPOLITAN PLANNING ORGANIZATIONS
BEFORE THE
U.S. SENATE ENVIRONMENT AND PUBLIC WORKS COMMITTEE**

Good afternoon, Mr. Chairman and members of the Committee. I am Kanathur Srikanth and I thank you Mr. Chairman and Ranking Member Barbara Boxer for the opportunity to provide my testimony. I am testifying today on behalf of the Association of Metropolitan Planning Organizations, AMPO and I would like to submit my written testimony for the record.

I am here to present a practitioner's perspective on the implications of changes to the existing ozone standard and the potential implementation issues for transportation planning and programming in metropolitan areas. I have no position on where the ozone standards should be set. Wherever it is set the MPOs in the country will have to comply with it and my MPO I am sure will comply with it.

I am the staff Director of the National Capital Region Transportation Planning Board which is the metropolitan planning organization, also called MPO, for the Washington, DC region. As you know MPOs are required to develop transportation plans and program for metropolitan areas as a condition of receiving federal transportation funds. If a MPO is located in an area that has been designated as non-attainment of EPA's air quality standards the MPOs are also required to conduct something called transportation conformity analysis in order to receive federal transportation funds.

I would like to note that my MPO has not taken an official position on the range of proposed ozone standard. The Metropolitan Washington Air Quality Committee and that is the regional air quality committee for this area set up under the Clean Air has taken a position. Its position is that the Committee supports the range of the proposed ozone standard, 65-70 parts per billion (ppb) as being more protective of human health and the environment. But the Committee also notes that the new standard will pose a fresh challenge to the metropolitan Washington region; and believes it is imperative that EPA help the states and local governments meet the new standards by providing assistance and adopting national rules as part of a national strategy to address air pollution.

A new ozone standard lower than the current level for this region will mean that this region will not be in attainment of the new standard. According to the most recent three year average measurements in this region most of the region's air quality monitors will be exceeding the range of values being considered by the EPA. These

readings also indicate that the Metropolitan Washington, area would need to reduce significant amounts of ozone precursor to comply with a new standard and transportation sector will certainly have to do its part in achieving these reductions.

My MPO has been conducting transportation air quality conformity analysis since the Clean Air Act Amendments of 1990. It is currently classified as a Marginal non-attainment area of the EPA's 2008 ozone standards, which is set at 75 ppb level. My MPO currently spends something in the range of \$6M annually to implement programs designed to reduce vehicular emissions in the region. For planning work the MPO sets aside at least 15% of its annual budget to conduct the air quality conformity analyses.

The National Capital Region has significantly reduced emissions over the years and it has attained all previous ozone standards and is on track to attain the 2008 standard within a year or so. These reductions have been made possible due to a number of federal emissions control programs supplemented by local actions including in land use and transportation investments. These are outlined in my written testimony. The critical thing to note is that without federal control programs the region would have had a hard time attaining the standards. We are very thankful for that. With all of the actions this region has taken current analysis shows that while the emissions will continue to reduce into the future, but beyond 2025 transportation emissions are going to remain relatively steady.

I believe that federal assistance is critical to help this region attain the new ozone standard. This is especially so in this region experiencing considerable amount of emissions transported into the region and is also forecast to experience considerable growth in population.

Federal assistance should encompass control programs and address interstate transport in a timely manner. Additional areas for federal assistance include: (1) action to provide certainty and timely realization of emissions reductions from new federal control programs, (2) harmonizing and simplifying some of transportation conformity regulations within the law, and (3) as always increased transportation funding to implement projects that help reduce emissions.

In conclusion, I believe the examination of current ozone standards is needed from a public health perspective; federal assistance to states, localities and metropolitan areas to help attain the new standard is also needed.

Thank you for your time, and the opportunity to speak before this committee.

**TESTIMONY OF
KANATHUR SRIKANTH
DIRECTOR OF TRANSPORTATION PLANNING
NATIONAL CAPITAL REGION
TRANSPORTATION PLANNING BOARD
METROPOLITAN WASHINGTON
COUNCIL OF GOVERNMENTS**

**ON BEHALF OF THE
ASSOCIATION OF METROPOLITAN PLANNING
ORGANIZATIONS**

**BEFORE THE
U.S. SENATE ENVIRONMENT AND PUBLIC WORKS
COMMITTEE**

**June 3, 2015
Washington, D.C.**

**Association of Metropolitan Planning Organizations
444 N Capitol Street, N.W., Suite 345, Washington, D.C 20001
P: 202-624-3680 • F: 202-624-3685 • www.ampo.org**



June 3, 2015

Mr. Chairman and Members of the Committee, I am Kanathur Srikanth, Director of Transportation Planning for the National Capital Region Transportation Planning Board (TPB), the Metropolitan Planning Organization (MPO) for the Washington, DC region. I am appearing today at your invitation and on behalf of the Association of Metropolitan Planning Organizations (AMPO) of which I am an active member, serving as a member on its Policy Committee and the Air Quality Group.

First I would like to thank Chairman Inhofe and Ranking Member Boxer for holding this hearing to review critical issues surrounding the proposed revisions to the 8 hour National Ambient Air Quality Standards (NAAQS) for ground level ozone and potential implications of the proposed revisions on regional transportation planning.

I understand the Committee is discussing the state and local implications and implementation challenges of the Environmental Protection Agency's (EPA's) proposed ozone standards across the United States. I am here to present a practitioner's perspective on how lowering the existing 8 hour ozone standard could impact transportation planning activities in metropolitan areas and on some of the potential implementation challenges. I will attempt to present the potential challenges for MPOs in general based on the efforts by and experiences of my own MPO, known as the National Capital Region Transportation Planning Board (TPB).

EPA issued a notice of proposed rulemaking (NPRM; Dec. 17, 2014), proposing to set the level of the 8-hour ozone standard to within the range of 65 to 70 ppb, reducing it from the current level of 75 ppb. In its proposed rulemaking, the EPA also solicited comment on setting the level of the ozone standard below 65 ppb, to as low as 60 ppb.

Federal transportation legislation requires that an MPO be designated for each urbanized area with a population of more than 50,000 people in order to carry out the metropolitan transportation planning process, as a condition of federal aid. About 405 MPOs operate in the United States. MPOs with a population greater than 200,000 are known as Transportation Management Areas (TMAs), and about 150 TMAs operate within the United States. The TPB for the National Capital Region is a TMA with a population of over 5M people covering about 3,000 square miles. The National Capitol Region is one of the large urban MPOs that will be affected should the EPA act to lower the 8 hour ozone standards.

The National Capital Region TPB has not taken an official position on the range of the proposed ozone standard. However, the Metropolitan Washington Air Quality Committee, the regional air quality planning body for this area established in 1992 under Section 174 of the Clean Air Act Amendments of 1990, of which the region's state and local environmental and transportation agencies are members, has taken an official position on the proposed ozone standard and has communicated this information to the EPA. The letter to the EPA notes: "Metropolitan Washington Air Quality Committee supports the range of the proposed ozone standard, 65-70

parts per billion (ppb) as being more protective of human health and the environment. MWAQC believes that this proposal is the next logical step in a long term effort to improve air quality. The new standard will pose a fresh challenge to the metropolitan Washington region..... it is imperative that EPA help the states and local governments meet the new standards by providing assistance and adopting national rules as part of a national strategy to address pollution – particularly as it relates to pollution that does not originate in our region.” A copy of the Metropolitan Washington Air Quality Committee’s letter to the EPA is included as part of my written testimony to this Committee.

Additionally the Association of MPOs, AMPO, has communicated its position to the EPA on the proposed changes to the ozone standards. AMPO’s position notes: “.....AMPO support(s) the need to protect public health, we are concerned that the proposed rule will dramatically expand the number of areas subject to transportation conformity requirements, including many areas in which local governments have limited, if any, ability to reduce ozone levels through changes in transportation plans and projects.” A copy of AMPO’s letter to the EPA’s docket is included as part of my detailed testimony to this Committee.

From a practitioner’s perspective and with specific reference to the National Capital Region and its MPO, I provide the following observations on the implications and potential implementation challenges associated with changes to the 8-hour ozone standards.

At the MPO level, a designation of nonattainment results in the implementation of transportation conformity requirements as per Section 176(c)(2) of the Clean Air Act. Under the Clean Air Act, air quality conformity analyses must be conducted to ensure that transportation plans and programs conform to the area’s state implementation plan for a particular federal air quality standard. Federal rules require that these analyses be approved before any new transportation plan or program can be adopted by an MPO. MPOs in nonattainment and maintenance areas must demonstrate conformity of their transportation Plans and Programs at least once every four years. An amendment to add a regionally significant project to the plan or program, or changes to an existing project in the plan or program would also trigger a conformity analysis.

For areas such as the Metropolitan Washington, D.C. area, where plans undergo regionally significant changes on a frequent basis due to the complexity, growth rates, and sheer size of the area’s transportation systems, MPOs must conduct these analyses on at least an annual basis. The TPB’s current budget includes about \$2M for activities directly related to air quality analysis which represents about 15% of its total budget. A conformity analysis is a highly technical undertaking that uses considerable amounts of data, time, the use of a broad range of growth estimates, and the application of several different computer models. The development of the supporting data and assumptions used in conformity analyses involve numerous interagency consultation meetings, public hearings, and engagement of MPO board members. Results of the conformity analysis must thoroughly vetted to ensure results are appropriate, representative, and informative.

Today, 227 counties are designated as nonattainment for the 75 ppb standard. EPA’s analysis shows that the number of counties designated as non-attainment could rise to 358 under a 70 ppb

standard and to 558 under a 65 ppb standard. Many of these localities have not previously been designated non-attainment and as such have not previously been subject to transportation conformity requirements. The MPOs in these areas would need to budget significant amount of time and money to develop air quality conformity analyses supporting their transportation plans and programs in order to continue receive federal transportation funds. EPA's analysis indicates that many of these areas would be able to attain the new standards with the help of existing and proposed federal control programs.

A stricter ozone standard would result in the need for additional reductions in ozone precursor emissions. The Metropolitan Washington region is currently classified in as a marginal non-attainment area for the of the EPA's 2008 8 hour primary ozone standards. The region anticipates demonstrating attainment of the 2008 standard by end of this year. Current air quality modeling analyses indicate that for the National Capital Region, additional precursor reductions would need to be implemented to meet lower health-based thresholds beneath 75 ppb. The magnitude of reductions as well as the time frame needed to achieve these reductions will depend on the level of the new standard.

For example, the latest three year average (2012-2014) of ozone measurements in this region indicate that 7 of the 10 monitors have recorded values higher than 70 ppb, the upper end of EPA's proposed range, and that all 10 monitors have recorded values higher than 65 ppb, the lower end of EPA's proposed range. Ozone concentrations monitored within the Metropolitan Washington, D.C. area would need to decrease 6 ppb to 11 ppb to comply with a new lower standard. For a moderate nonattainment area, the likely compliance deadline for the new standard is 2023.

The National Capital Region has made great strides in improving its air quality. The Region has attained the 1990 ozone NAAQS (120 ppb); the 1997 ozone NAAQS (80 ppb); and anticipates attaining the 2008 ozone NAAQS (75ppb) in the coming year. Emissions reductions achieved in this region to date have been possible due to a combination of federal control programs¹ and regulatory and voluntary actions at state and local levels.

¹ Past federal emissions control programs have been a significant contributor. Some of the major federal controls include:

Engine Standards, On-Road

- Federal Motor Vehicle Emission Control Program (Tier I)
- NLEV-National Low Emission Vehicle Program
- Tier 2 Vehicle and Gasoline Sulfur Program
- Enhanced Vehicle Emissions Inspection and Maintenance
- Reformulated Gasoline
- Heavy-duty Highway Engine Rules

Engine Standards, Off-Road

- Nonroad Diesel Emissions Program
- Emission Standards for Locomotive and Marine Engines
- North American Emission Control Areas (Off North American Coasts)

Electric Generating Unit (EGU) Programs-Federal

- NOx Budget Trading Program/NOx SIP Call
- Cross-State Air Pollution Rule

Locally, the National Capital region has taken actions on the transportation network and land use fronts to help reduce automobile travel and automobile emissions including:

- focusing its job and household growth in Activity Centers (areas that take about 9% of the land area but will host 76% of new jobs and 58% of new population).
- investing heavily in transit systems (more than 60% funding in TPB's plan is for Transit; 2/3 of activity centers will be connected by High Capacity Transit).
- strongly promoting non-motorized modes of travel (forecast increase in walk/bike trips almost same as increase in single occupant automobile trips), and
- implementing a number of regional travel demand management programs aimed at reducing automobile trips and vehicle miles travelled as a means of reducing automobile emissions of ozone precursors since the mid-1990s and costs about \$6M annually.

The results of these significant planning efforts are that vehicle miles traveled per capita is forecasted to decrease by about 3% and growth in vehicle trips and vehicles miles traveled is forecasted to grow at rate that is less than growth in population and jobs.

Even with all of these programs and efforts, the forecasts in ozone precursor emissions from the transportation sector beyond 2025 are forecast to remain steady unless new federal vehicle and/or fuel control programs are implemented. There are a number of factors for this.

First local transportation control measures in the National Capital Region have been voluntary, typically affecting only a small portion of the sector being targeted and thus producing smaller amounts of emissions reductions. Federal control programs, on the other hand, have broad applicability, can produce substantial amounts of emissions reductions and typically are much more cost-effective than voluntary local controls.

For example, current estimates of the region's travel demand management programs show that this program decreases nitrogen oxide (NOx) emissions by about 0.4% by 2025 and 0.6% by 2030. While these travel demand programs provide multiple other important benefits including improving roadway safety, reducing energy consumption, decreasing traffic congestions, and therefore should continue to be implemented and enhanced, the program does not result in a large percentage decrease in ozone precursor emissions. In contrast, emission reduction estimates for Tier 3, the latest federal emission control program for on road vehicles, are approximately 19% by 2025 and by 28% by 2030.

Second the anticipated growth of the Metropolitan Washington DC region is another factor that influences the amount of vehicular emission reductions this region can achieve via voluntary programs. In the next 25 years – which includes the period when the region would have to comply with new ozone standard - the regional forecast suggests that population will increase by approximately 1.3M people and the area will add approximately 1.2M more jobs. The regional forecasts estimate an additional 4M vehicle trips and 40M more vehicle miles travelled per day without additional transit and related investments.

-
- Cross State Air Pollution Rule (CSAPR).

Third, transportation funding constraints is another important factor that impacts the region's ability to realize additional significant amounts of on-road emissions in a timely manner to improve air quality and comply with any tougher ozone standards. Within the transportation sector in this region, funding to pursue or accelerate other improvements aimed at reducing vehicular travel and automobile emissions is constrained. Of the approximately \$250B the region anticipates spending on transportation in the next 25 years, 83% is for maintenance, operations and state of good repair. Only 17% is available for capacity expansion of the highway and transit systems, and no governmental funding exists for a comprehensive system of infrastructure to support consumer acceptance of emerging and alternative fuel technologies such as electric vehicles.

In light of the above challenges to reducing on road vehicular emissions, federal efforts to assist states and MPOs reduce emissions and achieve national air quality standards should be an integral part of a broad strategy to meet new ozone NAAQS. At a minimum, federal efforts should encompass the development of new multi-sector control programs to help attain future ozone standards expeditiously. These new control programs should address interstate transport mandates in a timely manner. Failure to address such outstanding issues as interstate transport places undue burdens on transportation planning organizations within nonattainment areas. Minimum federal efforts should also include:

- timely enactment of implementation rules and guidance for all new standards;
- thorough review and update of the existing transportation conformity regulations so that transportation planning and air quality planning efforts may be harmonized;
- streamlining and simplifying the conformity process for areas that EPA's analysis indicates will attain the new ozone standard based solely on existing federal control programs; and
- increased transportation funding and flexibility in use of the funds for both planning and project implementation.

Local land use solutions and investment in transit and non-motorized travels to reduce vehicle miles of travel, while successful and necessary for many reasons including improving air quality, are however limited in terms of their ability to provide significant additional ozone precursor emission reductions in a timely manner and are also affected by improvements in vehicle emissions and fuel economy standards. As ozone standards are lowered, additional emission reductions from the on road and non-road sector will be critical to attaining those standards. In order to achieve significant reductions from the on-road sector, federal efforts and participation are imperative. Without adequate planning, funding and federal support, Metropolitan Planning Organizations could face difficulties in demonstrating conformity of its transportation plans and programs to the new emissions standards, leading to potential disruption in flow of federal transportation funds to the areas.

Working together, federal, state, regional and local environmental and transportation agencies must develop coordinated actions and be provided adequate resources to implement the timely actions needed to harmonize the dual goals of reducing ozone emissions to improve air quality and meeting the transportation needs of our communities.

Thank you for your time and the opportunity to speak before this committee.

Metropolitan Washington Air Quality Committee

Suite 300, 777 North Capitol Street, N.E. Washington, D.C. 20002-4239 202-962-3358 Fax: 202-962-3203

March 4, 2015

Administrator Gina McCarthy
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Mail code 28221T
Washington, DC 20460
Docket ID No. EPA-HQ-OAR-2008-0699

Dear Administrator McCarthy:

On behalf of the Metropolitan Washington Air Quality Committee (MWAQC), I am writing to comment on the proposed revisions to the National Ambient Air Quality Standards (NAAQS) for ozone. MWAQC was designated in 1992 under Section 174 of the Clean Air Act (CAA), to develop regional air quality plans for attaining Federal air quality standards in the Washington region. We have done so successfully over the past twenty three years. This assignment is carried out through a partnership among the States of Maryland and Virginia and the District of Columbia, and the region's local governments in the non-attainment area.

MWAQC supports the range of the proposed ozone standard, 65-70 parts per billion (ppb) as being more protective of human health and the environment. We are pleased that EPA's recommended standard is consistent with the Clean Air Scientific Advisory Committee's (CASAC) recommendations made in 2014. MWAQC believes that this proposal is the next logical step in a long term effort to improve air quality.

The new standard will pose a fresh challenge to the metropolitan Washington region. On the worst days of summer, transported pollution concentrations can exceed the levels proposed for the standard. MWAQC has and will continue to adopt all feasible control programs at the local level, however, it is imperative that EPA help the states and local governments meet the new standards by providing assistance and adopting national rules as part of a national strategy to address pollution – particularly as it relates to pollution that does not originate in our region.

Thank you for taking our concerns into consideration as EPA finalizes the new standard in the coming months.

Sincerely,



David Snyder, Chair
Metropolitan Washington Air Quality Committee

cc: MWAQC Members
COG Board of Directors
Governor Hogan, Governor McAuliffe, Mayor Bowser



John Cox, President
Director, Wyoming Department of Transportation

Bud Wright, Executive Director

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March 17, 2015

Environmental Protection Agency
EPA Docket Center (EPA/DC)
Mailcode 28221T, Attention Docket ID
No. OAR-2008-0699
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: Comments on Proposed National Ambient Air Quality Standards for Ozone

To the Environmental Protection Agency:

The American Association of State Highway and Transportation Officials (AASHTO) and the Association of Metropolitan Planning Organizations (AMPO) welcome the opportunity to submit these comments on the proposed National Ambient Air Quality Standards (NAAQS) for ozone, which was published by the Environmental Protection Agency (EPA) in the Federal Register on December 17, 2014. (78 Fed. Reg. 75234).

While AASHTO and AMPO support the need to protect public health, we are concerned that the proposed rule will dramatically expand the number of areas subject to transportation conformity requirements, including many areas in which local governments have limited, if any, ability to reduce ozone levels through changes in transportation plans and projects. As explained further below, we urge EPA to consider the consequences for transportation conformity requirements when setting and implementing any new NAAQS for ozone.

I. General Comments

In this notice of proposed rulemaking (NPRM), EPA proposes to set the ozone NAAQS at a level between 65 and 70 parts per billion (ppb), reducing it from the current level of 75 ppb. According to EPA's projections, the stricter standard would cause hundreds of additional counties to become designated as non-attainment. Currently, 227 counties are designated as non-attainment for the 75 ppb standard.¹ See **Attachment 1**. Under the NPRM, the number of

¹ See EPA, Green Book, "8-Hr Ozone (2008) Nonattainment Areas" (last updated Jan. 30, 2015), available at <http://www.epa.gov/airquality/greenbook/hntc.html>. See **Attachment 1**.

counties designated as non-attainment would rise to 358 under the 70 ppb standard and to 558 under the 65 ppb standard.² See **Attachment 2**.

As shown in EPA's maps, many of the counties that would become newly designated as non-attainment for ozone are located outside metropolitan areas or are in small metropolitan areas, and have not previously been subject to transportation conformity requirements.³ The following States - all of which currently have no ozone non-attainment areas - include counties that would violate the 65 or 70 ppb standards according to EPA's projections: Alabama, Florida, Idaho, Iowa, Kansas, Maine, Michigan, Nebraska, Nevada, New Hampshire, New Mexico, Oklahoma, South Dakota, Utah, and West Virginia.⁴ In addition, the number of counties in non-attainment would increase in many other States, including Arizona, Colorado, Indiana, Wisconsin, Wyoming, and others.⁵

Notably, many of the areas that would be designated as nonattainment have high background levels of ozone, especially in rural areas and Western states. According to the Regulatory Impact Analysis that accompanies the NPRM, EPA acknowledges that "Background ozone is a relatively larger percentage (e.g., 70-80%) of the total seasonal mean ozone in locations within the intermountain western U.S. and along the U.S. border."⁶ The report estimates that seasonal mean background levels of ozone are "greater than 40 ppb" in Colorado, Nevada, Utah, Wyoming, northern Arizona, eastern California, and parts of New Mexico.⁷

Given the high background levels as a percentage of current ambient levels, many areas in the West (and to some extent in other parts of the country as well) will have limited ability to reduce ambient levels of ozone through changes in transportation plans and the associated transportation conformity process. The Regulatory Impacts Analysis acknowledges this difficulty in discussing rural areas in the Southwest: "[M]odeling of additional NOx reductions [beyond those already on the books] within the region provide little incremental benefit suggesting that most of the regional anthropogenic sources impacting ozone at these locations have already been accounted for in the 2025 base case scenario."⁸

For States and MPOs, the change in the NAAQS will have significant practical implications, including administrative burdens and slowdown in project delivery. The administrative burdens result from the need to make transportation conformity findings for ozone in hundreds of counties where those findings are not currently required. Especially in rural areas and small metropolitan areas, these burdens will be significant in comparison to existing budgets for transportation planning. The effect on project delivery results from the additional time required

² See EPA, "Counties Violating the Primary Ground-level Ozone Standard Based on Monitored Air Quality from 2011 - 2013" (undated) available at <http://www.epa.gov/groundlevelozone/pdfs/20141126-20112013datatable.pdf>.

³ Id.

⁴ Id.

⁵ This statement is based on a comparison of the counties currently in nonattainment for the 2008 ozone NAAQS (<http://www.epa.gov/airquality/greenbook/hncs.html>) and the list of counties identified by EPA as being in violation of the proposed ozone NAAQS (<http://www.epa.gov/groundlevelozone/pdfs/20141126-20112013datatable.pdf>).

⁶ EPA, "Regulatory Impact Analysis of the Proposed Revisions to the National Ambient Air Quality Standards for Ground-Level Ozone" (Nov. 2014), p. 2-16.

⁷ Id.

⁸ Id. p. 3A-54.

for transportation conformity determinations. While it is difficult to quantify these administrative burdens and delay impacts, we expect that they will be significant.

Finally, we note that according to EPA's own projections, "the vast majority of U.S. counties would meet the proposed standards by 2025 just with the rules and programs now in place or under way."⁹ EPA's analysis includes a "base case" scenario, which assumed implementation of all regulations currently on the books, including new vehicle fuel economy and emissions standards. The analysis found that only 9 counties outside California would violate the 70 ppb standard in 2025, and only 68 counties would violate the 65 ppb standard in 2025.¹⁰ See **Attachment 3**. In other words, the vast majority of counties that will be designated as non-attainment under the NPRM will come into compliance with the proposed standards *without any additional action being taken* - and yet they still would need to undertake a time-consuming and burdensome transportation conformity process.

In short, the proposed change in the ozone NAAQS would trigger the designation of hundreds of additional counties across the country as non-attainment areas, which in turn would require compliance with transportation conformity requirements. The transportation conformity process will impose a difficult - if not impossible - task in places where background levels are so high that there is little that can be done through transportation planning to reduce ambient ozone. And in many other counties, transportation conformity will impose burdens without corresponding benefits, because the areas would meet the new standards without any additional action being taken. EPA should carefully consider these practical implications when exercising its policy discretion to determine the appropriate level for the NAAQS.

II. Specific Comments

In addition to the general comments provided above, we also submit the following specific comments regarding issues addressed in the NPRM.

A. Primary Standard

While the decision on where to set the NAAQS is based on health effects and does not take into account cost of compliance, the NPRM recognizes that the decision involves a "public health policy judgment" by the Administrator and that the Administrator has some discretion to determine the appropriate level.¹¹ We recommend that EPA set a primary standard at a level that is best supported by the science, taking into account the uncertainty inherent in the available scientific studies regarding health effects of ozone at various levels.

If the standard is lowered, the available scientific evidence provides stronger support for setting the standard close to the upper end of the range being considered (0.070). As stated in the NPRM, "the Administrator judges that the evidence supporting the occurrence of adverse

⁹ EPA, "EPA's Proposal to Update the Air Quality Standards for Ground-Level Ozone" (undated), available at: <http://www.epa.gov/groundlevelozone/pdfs/20141125fs-overview.pdf>.

¹⁰ EPA, "Counties Projected to Violate the Primary Ground-level Ozone Standard Model - Projections for 2025" (undated), available at <http://www.epa.gov/groundlevelozone/pdfs/20141126-2025datatable.pdf>.

¹¹ 79 Fed. Reg. 75243.

respiratory effects is strongest for exposures at or above the 70 and 80 ppb benchmarks.” (p. 75305).

B. Secondary Standard

The NPRM proposes to set the secondary standard in the range of 65 to 70 ppb, which is the same range proposed for the primary standard. This range correlates to a separate measure, the W126 index value of “W126 index” in a range of 13 to 17 parts per million-hours (ppm-hours). The NPRM also invites comment on an alternative approach, under which the secondary standard would be set based on the W126 index values.¹²

We recommend that the EPA set the secondary standard at the same level as the primary standard, as it is under current regulations, because implementation of transportation conformity and other Clean Air Act requirements in nonattainment areas will be more efficient if the primary and secondary NAAQS are the same.

Moreover, if EPA were to set a different secondary standard, we recommend that the standard use the same measurements (ppb) as are used for the primary standard, so that the monitoring data gathered to assess compliance with the primary standard can also be used to determine compliance with the secondary standard.

C. Exceptional Events Demonstrations

The NPRM notes that several forms of relief are available for areas with high background levels, including exclusion of data affected by exceptional events. The NPRM correctly recognizes that these provisions would become much more important if the NAAQS is lowered, especially if it is lowered to 65 ppb:

While any prediction of the exact nature of future implementation challenges associated with alternative prospective standards is inherently uncertain, **there is no question that, as the levels of alternative prospective standards are lowered, background will represent increasingly larger fractions of total O3 levels** and may subsequently complicate efforts to attain these standards. For a prospective standard of 70 ppb, the EPA does not believe that background O3 would create significant implementation-related challenges at locations throughout the U.S. and prevent attainment of the NAAQS. However, as the levels of prospective standards are lowered, the areas that would most likely need to use the relief mechanisms discussed in this section as part of attaining the lower prospective levels are rural locations in the western U.S., consistent with the previously mentioned locations where we have estimated the largest seasonal average values of background occur.¹³

¹² 79 Fed. Reg. 75237 (“The EPA also solicits comments on the alternative approach of revising the secondary standard to a W126-based form, averaged over three years, with a level within the range of 13 ppm-hrs to 17 ppm-hrs.”).

¹³ 79 Fed. Reg. 75383.

We are concerned that it may be extremely difficult for a State to demonstrate - within the time period allowed for making non-attainment designations - that violations result from exceptional events. The process for making an exceptional-event determination is governed by the confusing, burdensome requirements established in the 2007 Exceptional Events Rule, which essentially requires the State to provide scientific proof of a causal relationship between the exceptional event and an exceedance of the NAAQS.¹⁴ EPA has issued interim guidance to clarify the rule, but that guidance itself establishes a lengthy process that would take more than two years to complete, including a period of up to 18 months for EPA review *after* a State has submitted a complete documentation package.¹⁵ EPA has announced its intention to commence a new rulemaking to streamline the Exceptional Events Rule - but the proposed regulations have not yet been issued, and the NPRM for the ozone NAAQS does not commit to a specific schedule for the rulemaking on the Exceptional Events Rule.¹⁶

Moreover, the schedule proposed in the ozone NAAQS rule for flagging and documenting exceptional events is very tight. The ozone rule would give states twelve months from the time of promulgation to provide any exceptional event demonstration documents to the EPA for events occurring in 2013, 2014, and 2015. This time period coincides with the deadline for states to make designation recommendations to the EPA (another labor-intensive exercise). The EPA's Administrator would then have 12 months to make final designations while concurrently reviewing exceptional event packages.¹⁷ In our view, these deadlines do not allow adequate time for the development and approval of state demonstrations requesting the exclusion of data from the first round of designations under the new standard.

Our concerns about the schedule for making exceptional-event determinations are heightened by the likelihood that - with the lower NAAQS - EPA will be receiving a large number of requests for exceptional-event determinations, increasing the likelihood of delay in EPA's review. The potential for delay may increase even further because, during this same time period, EPA will be undertaking a rulemaking to revise the very regulations (the Exceptional Event Rule) on which these determinations will be based.

If exceptional-event determinations are not made in a timely manner, an area may be designated as nonattainment based on exceedances that are later determined to result from exceptional events. Unfortunately, there is no authority for the EPA to redesignate an area (from non-attainment to attainment) based on changes to past air quality data.¹⁸ Therefore, if an exceptional-event determination is approved *after* EPA's ozone nonattainment designation is

¹⁴ 40 C.F.R. 50.14.

¹⁵ See EPA, "Interim Guidance to Implement Requirements for the Treatment of Air Quality Monitoring Data Influenced by Exceptional Events" (May 10, 2013), available at <http://www.epa.gov/ttn/analysis/exevents.htm>.

¹⁶ See 79 Fed. Reg. 75358 ("The EPA expects to propose additional revisions to the Exceptional Events Rule in a future notice and comment rulemaking effort and will solicit public comment on other, non-schedule related, aspects of the Exceptional Events Rule at that time.")

¹⁷ See 79 Fed. Reg. 75353-75358 (describing proposed schedule for exceptional-event determinations under the proposed ozone NAAQS rule).

¹⁸ Section 107(d)(3) of the Clean Air Act governs redesignations of non-attainment areas. It requires that an area demonstrate that it is currently attaining the NAAQS, in addition to meeting other specific requirements, such as having an approved SIP, and demonstrating that the improvement in air quality is due to permanent and enforceable emission reductions resulting from the implementation of the SIP and applicable federal requirements.

made, the nonattainment designation would remain in effect - even if that designation would not have been justified if the exceptional event had been excluded. In effect, significant delays in approving exceptional-event determination may cause areas to be designated as non-attainment when that designation is not actually justified.

To address these concerns, **it will be essential for EPA to ensure that there is a workable, efficient process for making exceptional event determinations.** Therefore, if the proposed NAAQS are adopted, we urge EPA to develop guidance, templates, training materials, and other practical resources to assist States in obtaining expeditious approval for exceptional event determinations. We also urge EPA to consider a more programmatic approach to making exceptional events determinations, which would minimize the need to develop extensive documentation for each individual event.

In addition, we recommend that EPA establish a process for deferring non-attainment designations for areas with pending requests for exceptional-event determinations at the time of the statutory deadline for making non-attainment designations. **Specifically, we recommend that EPA designate as “unclassifiable” any area that has a pending, unresolved request for an exceptional-event determination that is material to the designation decision.** Designation of an area as non-attainment should be made only *after* the request for an exceptional-event determination has been resolved.

D. Methodology for Determining Ambient Levels (Data Uncertainty)

The proposed rule should take into account the uncertainty in monitor data when designating non-attainment areas. The EPA’s data quality assurance handbook for air quality monitors identifies the acceptance criteria for ozone measurements as being whether a one-point quality control check for a single analyzer is +/- 7 % compared to a known quantity. That means that a valid measurement as high as 74.9 ppb or as low as 65.1 ppb could potentially be sampling actual ozone concentrations of 70 ppb, and that measurements as high as 69.6 ppb and or as low as 60.5 ppb could be sampling actual ozone concentrations of 65 ppb.

AASHTO and AMPO request that EPA consider a designation approach that accounts for known monitor data uncertainty. AASHTO and AMPO recommend EPA designate areas as “unclassifiable” rather than “nonattainment” if its design value is within the range that could be explained by monitoring equipment measurement uncertainty within the range allowed by EPA for valid ozone measurements ($70 \text{ ppb} \pm 4.9 \text{ ppb}$ for a 70 ppb standard and $65 \pm 4.5 \text{ ppb}$ for a 65 ppb standard), since this level of uncertainty calls into question whether that design value is actually not attaining the standard and instead suggests that the area “cannot be classified on the basis of available information as meeting or not meeting” the standard. This is an appropriate use of the “unclassifiable” designation that Congress quite deliberately included in designation options.

E. Designation of Non-Attainment Area Boundaries

While the proposed rule did not address the criteria for determining the boundaries of a non-attainment area, the NRPM “solicits comment related to establishing area designation boundaries

for the proposed revised primary and secondary NAAQS, including any relevant technical information that should be considered by the EPA and the extent to which different considerations may be relevant to establishing boundaries for a distinct secondary NAAQS.”

AASHTO and AMPO recommend that, when making non-attainment designations, EPA should avoid relying upon a single monitor to designate a broad multi-county area. This consideration is especially important in Western states with large rural counties, which often include federal or tribal lands. EPA should also consider changing how design values are determined. For example, in large multi-county areas with multiple monitors, EPA could choose to average the concentrations across all monitors instead of just using the monitor with the annual fourth-highest daily maximum 8-hr concentration, averaged over three years.

F. Transportation Conformity Requirements in New Nonattainment Areas

As noted above, lowering the NAAQS will likely cause hundreds of additional counties to come into non-attainment. Compliance with transportation conformity will be a significant burden, but in most cases, will not have corresponding benefits, because as the NPRM acknowledges, the vast majority of the counties will come into compliance with the stricter NAAQS levels even if no additional regulatory action is taken.

AASHTO and AMPO recommend that EPA use all regulatory flexibilities available within existing law to defer the imposition of transportation conformity requirements on areas that EPA’s own modeling shows will come into compliance with the NAAQS without any additional actions being taken. If the transportation conformity requirements cannot be entirely deferred in these areas, EPA should allow a streamlined process for making conformity determinations in those areas, given that additional actions are not needed to achieve the NAAQS or demonstrate conformity.

G. Timing of Implementation Guidance and Regulations

This rulemaking does not include implementation guidance for the new NAAQS, but EPA has requested comment on implementation issues as part of this rulemaking. AASHTO and AMPO urge EPA to issue guidance as early as possible after finalizing the NAAQS in order to minimize any delays involved in transitioning into the new guidance.

Thank you for the opportunity to comment on EPA’s proposed NAAQS for Ozone. Should you have any questions, please contact: Shannon Eggleston from AASHTO at 202-624-3649, or DeLania Hardy from AMPO at 202-624-3684.

Sincerely,

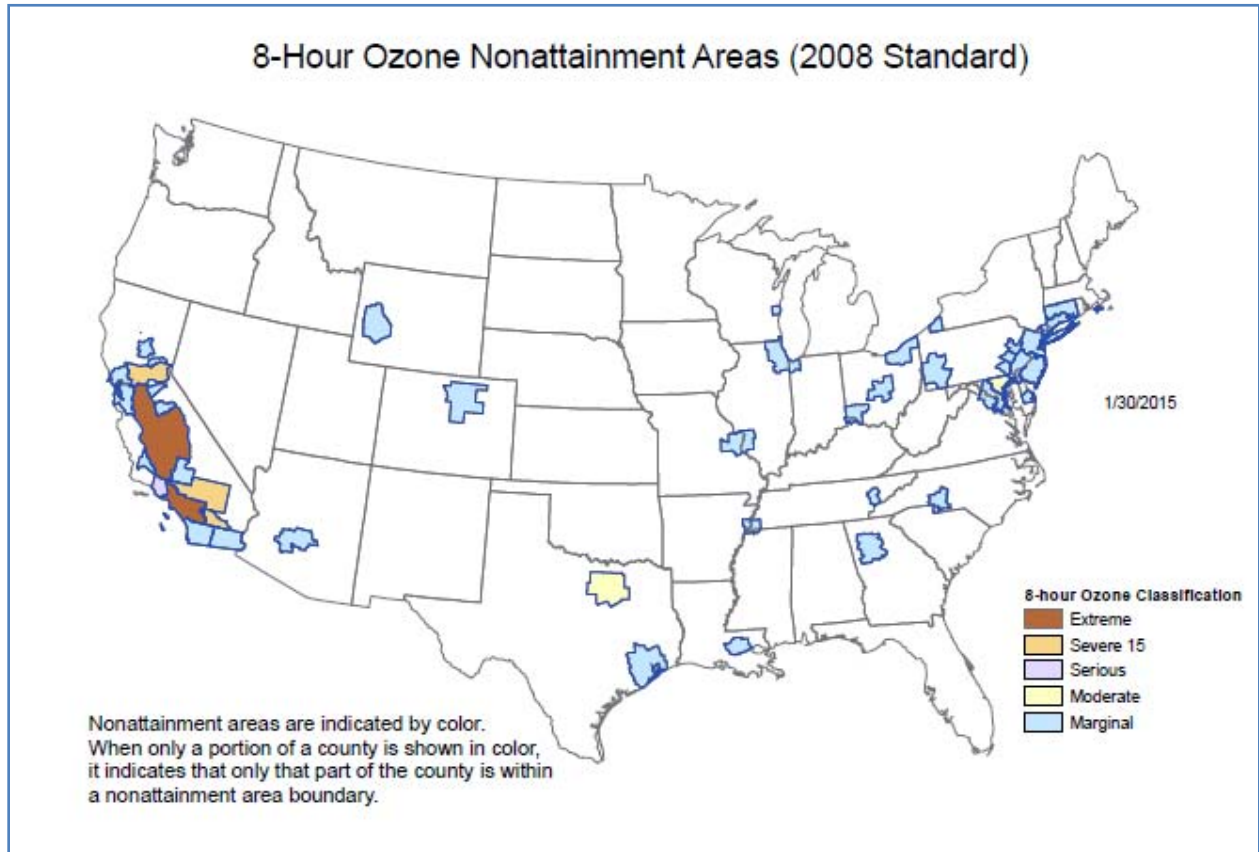


Bud Wright
Executive Director
AASHTO



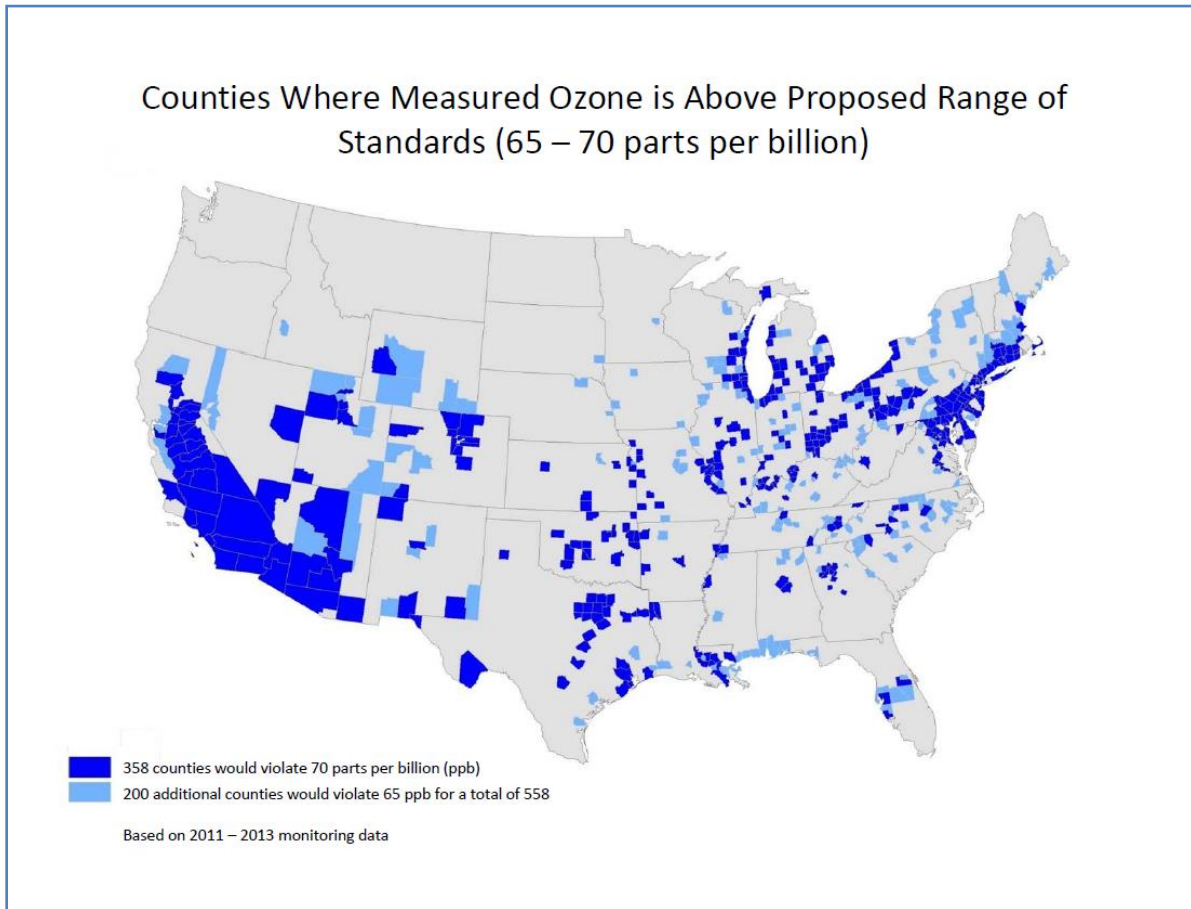
DeLania Hardy
Executive Director
AMPO

Attachment 1: Counties Designated as Non-Attainment for 2008 Ozone NAAQS (75 ppb)



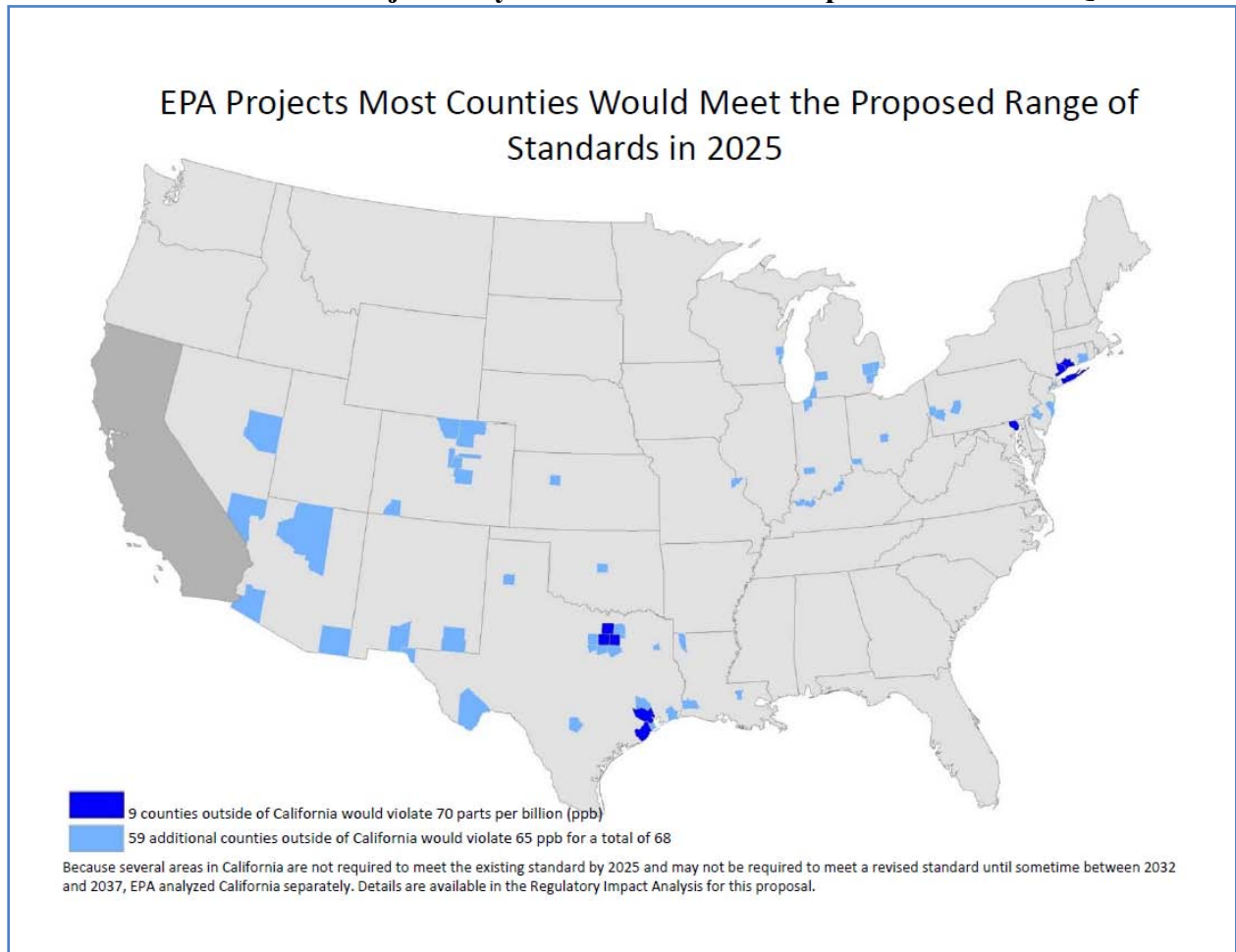
Map is from EPA Green Book on nonattainment areas at:
http://www.epa.gov/airquality/greenbook/map8hr_2008.html

Attachment 2: Counties Projected by EPA to Violate the Proposed Ozone NAAQS Based on Current (2011-2013) Monitoring Data



<http://www.epa.gov/airquality/ozonepollution/pdfs/20141126-ozonemaps.pdf>

Attachment 3: Counties Projected by EPA to Violate the Proposed Ozone NAAQS in 2025



<http://www.epa.gov/airquality/ozonepollution/pdfs/20141126-ozonemaps.pdf>

