

National Capital Region Transportation Planning Board

777 North Capitol Street, N.E., Suite 300, Washington, D.C. 20002-4290 (202) 962-3310 Fax: (202) 962-3202 TDD: (202) 962-3213

Item #5

MEMORANDUM

February 18, 2009

TO: Transportation Planning Board

FROM: Ronald F. Kirby
Director, Department of
Transportation Planning

RE: Additional Letters Sent/Received

The attached additional letters sent/received will be reviewed along with other letters sent/received under item #5 of the February 18th TPB agenda.

Attachments



U.S. Department
of Transportation

Federal Transit Administration
Region III
1760 Market Street, Suite 500
Philadelphia, PA 19103
215-656-7100
215-656-7260 (fax)

Federal Highway Administration
DC Division
1990 K Street, N.W., Suite 510
Washington, DC 20006
202-219-3536
202-219-3545 (fax)

February 17, 2009

The Honorable Charles Jenkins, Chairman
National Capital Region Transportation Planning Board
c/o Mr. Ronald Kirby, Director of Transportation Planning
Metropolitan Washington Council of Governments
777 North Capital Street, NW, Suite 300
Washington, DC. 20002-4201

Dear Chairman Jenkins:

The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) have completed our review of the 2008 Constrained Long Range Plan (CLRP) and FY 2009-2014 Metropolitan Transportation Improvement Program (MTIP) for the Washington Metropolitan Area adopted by the Transportation Planning Board (TPB) on November 19, 2008.

The Environmental Protection Agency (EPA), in a letter to FHWA's District of Columbia Division dated February 4, 2009 for the 8-Hour Ozone, Carbon Monoxide and PM 2.5 air quality conformity (enclosure), acknowledges its review and includes technical documentation that supports the conformity finding of the region's 2008 CLRP and FY 2009-2014 MTIP. It is our finding that the analytical results provided by the TPB to demonstrate conformity is consistent with EPA's Transportation Conformity Rule (40 CFR Part 93), as amended.

We find that the 2008 CLRP and the FY 2009-2014 MTIP conform to the region's State Implementation Plans, and that the conformity determination has been performed in accordance with the Transportation Conformity Rule (40 CFR Part 93), as amended. The findings are based (in part) on the self-certification statement submitted by the MPO under 23 CFR 450.316(b) (1) and activities by FHWA, FTA, and the State Transportation agencies in accordance with the Federal and State oversight responsibilities.

Any questions concerning this approval action should be directed to Sandra Jackson, of the FHWA District of Columbia Division, at (202) 219-3521 or Gail McFadden-Roberts, of the FTA Region III Office, at (215) 656-7121.

Sincerely,

Letitia A. Thompson
Regional Administrator
Federal Transit Administration

Mark Kehrl
Division Administrator
Federal Highway Administration

Enclosure

cc: Rick Rybeck, District of Columbia Division of Transportation
Jason Harrington, Washington Metropolitan Area Transit Authority
JoAnne Sorenson, Northern Virginia District Office, VDOT
Kellie Gaver, Maryland Department of Transportation
Kwame Arhin, FHWA Maryland Division
Uwanna Dabney, FHWA Virginia Division
Edward Sundra, FHWA Virginia Division
Brian Glenn, FTA Washington DC Metropolitan Office



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

FEB - 4 2009

Mr. Mark R. Kehrl
Division Administrator
Federal Highway Administration,
District of Columbia Division
1900 K Street, NW, Suite 510
Washington, D.C. 20006-1103

Dear Mr. Kehrl:

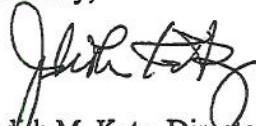
The United States Environmental Protection Agency (EPA), Region III has reviewed the 8-Hour Ozone, Carbon Monoxide and PM_{2.5} Conformity Determination for the 2008 Constrained Long-Range Plan and the FY 2009-2014 Metropolitan Washington Transportation Improvement Program (TIP) as adopted by the National Capital Region Transportation Planning Board (TPB) and submitted to us by the Federal Highway Administration (FHWA) on December 11, 2008. EPA has reviewed the Conformity Determination in accordance with the procedures and criteria of the Transportation Conformity Rule contained in 40 CFR Part 93.

Our review of the conformity determinations for the Washington, D.C. Metropolitan Area indicates that the determinations meet the requirements of the Clean Air Act and the applicable regulations promulgated thereunder at 40 CFR Part 93. Enclosed, please find EPA's detailed evaluation titled "Technical Support Document for Review of the 8-Hour Ozone, Carbon Monoxide and PM_{2.5} Conformity Determination of the 2008 Constrained Long-Range Plan and the FY 2009-2014 Metropolitan Washington Transportation Improvement Program." It should be noted that in our technical support document we are again deferring to the FHWA on the question of whether the Plan and TIP are fiscally constrained. Therefore, our concurrence on the overall conformity determination is predicated upon FHWA determining that the Plan and TIP are fiscally constrained.



Please feel free to call Carol Febbo, Chief, Energy, Radiation and Indoor Environment Branch at (215) 814-2076 or Martin T. Kotsch, at (215) 814-3335 to discuss this review.

Sincerely,



Judith M. Katz, Director
Air Protection Division

Enclosure


cc: Kwame Arhin (FHWA, MD)
Sandra Jackson (FHWA, DC)
Ed Sundra (FHWA, VA)
Howard Simons (MDOT)
Diane Franks (MDE)
Ron Kirby (TPB)
Gail McFadden-Roberts (FTA)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103

January 29, 2009

SUBJECT: Technical Support Document for Review of the 8-Hour Ozone, Carbon Monoxide and PM2.5 Conformity Determinations of the 2008 Constrained Long Range Plan and the FY 2009-2014 Metropolitan Washington Transportation Improvement Program

FROM:  Martin I. Kotsch, (3AP23)

TO: Administrative Record of EPA's Review of the 8-Hour Ozone, Carbon Monoxide and PM2.5 Conformity Determinations of the 2008 Constrained Long Range Plan and the FY 2009-2014 Metropolitan Washington Transportation Improvement Program

THRU: Carol Febbo, Chief 
Energy, Radiation and Indoor Environment Branch (3AP23)

The purpose of this document is to review the November 2008 air quality 8-Hour Ozone, Carbon Monoxide and PM2.5 conformity determinations of the 2008 Constrained Long Range Plan (CLRP) and the FY 2009-2014 Metropolitan Washington Transportation Improvement Program (TIP) prepared by the Metropolitan Washington Council of Governments, National Capital Region Transportation Planning Board (TPB). The TIP and CLRP conformity determinations were submitted to the Environmental Protection Agency (EPA) on December 11, 2008 by the District of Columbia Division of the United States Federal Highway Administration (FHWA).

The Metropolitan Washington D.C. Area is a moderate 8-hour non-attainment area for ozone. For the 8-hour conformity analysis, the 2005 Attainment SIP budgets for the 1-hour standard are applicable for use in the 8-hour conformity analysis per 93.109(e) of the conformity rule since there are no current adequate or approved 8-hour mobile budgets. As a small piece of the previous geographical 1-hour non-attainment area (Stafford County, VA) is now in another non-

attainment area (Fredericksburg, VA), the previous 1-hour budget for 2005 could have been reduced to reflect the new smaller 8-hour non-attainment area. However TPB chose to continue to include Stafford County in its travel demand analysis and emissions analysis, which is permissible under the conformity rule until such time that new SIPs for the smaller 8-hour non-attainment area with new mobile budgets are submitted and either found adequate or approved by EPA. The area is also a CO maintenance area with an emissions budget which requires a conformity determination.

The Metropolitan Washington D.C. Area is a non-attainment area for PM_{2.5} annual standard, with smaller geographical boundaries than its previous 1-hour ozone non-attainment area. Therefore the TPB developed a new transportation model which reflected the smaller non-attainment area to develop the necessary VMT and related emission factors to complete the conformity analysis and determination.

The conformity determination was reviewed in accordance with the procedures and criteria of the Transportation Conformity Rule, 40 CFR Part 93, Sections 93.102(b)(1), 93.102 (b)(2)(iv), 93.102(b)(2)(v), 93.102(b)(3), 93.106, 93.108, 93.110, 93.111, 93.112, 93.113(b), 93.113(c), 93.118 and 93.119.

**Evaluation of the 2008 Constrained Long Range Plan and the FY2009-2014 Metropolitan Washington
Transportation Improvement Program**

GENERAL CRITERIA APPLICABLE TO THE TIP AND CLRP

SECTION of 40 CFR Part 93	CRITERIA	Y/N	COMMENTS
93.110	<p>Is the conformity determination based upon the latest planning assumptions?</p> <p>(a) Is the conformity determination, with respect to all other applicable criteria in §§93.111 - 93.118, based upon the most recent planning assumptions in force at the time of the conformity determination?</p> <p>(b) Are the assumptions derived from the estimates of current and future population, employment, travel, and congestion most recently developed by the MPO or other designated agency? Is the conformity determination based upon the latest assumptions about current and future background concentrations?</p>	Y	<p>(a) & (b) The conformity determination is based upon latest planning assumptions in force and approved by the TPB at the time of the determination. The assumptions include:</p> <p>1) Travel Demand Modeling Assumptions: - Use of newer Version 2.2 travel demand model process -New travel forecasts incorporated.</p> <p>2) Emissions Model Assumptions: MOBILE6.2 modeled emissions factors were developed for years; 2009, 2010, 2020, 2030 for all pollutants except CO which was modeled for 2010, 2020 and 2030.</p> <p>3)Emissions Factor Assumptions -Enhanced I/M was assumed in DC, MD, VA -Low emission vehicle program was modeled -No oxygenated fuels were assumed for wintertime -Tier 2 / low sulfur vehicle controls were modeled</p> <p>4) Vehicle Registration Data: 2005 data for Maryland, DC and Virginia</p>

	<p>(c) Are any changes in the transit operating policies (including fares and service levels) and assumed transit ridership discussed in the determination?</p> <p>(d) The conformity determination must include reasonable assumptions about transit service and increases in transit fares and road and bridge tolls over time.</p> <p>(e) Does the conformity determination use the latest existing information regarding the effectiveness of the TCMs and other implementation plan measures which have already been implemented?</p> <p>(f) Are key assumptions specified and included in the draft documents and supporting materials used for the interagency and public consultation required by §93.105?</p>	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>	<p>5) Land Activity Assumptions (growth forecasts): In March, 2007 Round 7.1 forecasts were approved by the TPB for use in the conformity determination. As a result, household data as well as employment data have been updated. New growth figures between 2002 and 2030 used in this determination are shown below: -Household: 44% increase -Employment: 45% increase</p> <p>(c) Transit policies such as frequency and hours of operation were updated from the last conformity determination</p> <p>(d) Transit ridership and services were adjusted to reflect increased fares from several providers within the affected region. No changes in bridge tolls are anticipated at this time</p> <p>(e) All of the TCMs listed in the Phase II Attainment Plan for the Metropolitan Washington D.C. area were implemented. The latest information regarding TCMs and other implementation plan measures effectiveness have been used.</p> <p>(f) Appendix A of the conformity determination provides key assumptions for this conformity determination. This document and its earlier drafts were developed through the interagency and public consultation process detailed in the chart on page A-8 of Appendix A.</p>
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**Evaluation of the 2008 Constrained Long Range Plan and the FY2009-2014 Metropolitan Washington
Transportation Improvement Program**

GENERAL CRITERIA APPLICABLE TO THE TIP AND CLRP

93.111	Is the conformity determination based upon the latest emissions model?	Y	This conformity determination used the mobile emissions model: MOBILE6.2, the latest EPA emissions model available to do the emissions analysis
93.112	Did the MPO make the conformity determination according to the consultation procedures of the conformity rule or the state's conformity SIP?	Y	<p>Consultation procedures were followed in accordance to the TPB consultation procedures. These procedures are based on the procedures of the Federal Conformity Rule.</p> <p><u>Interagency Consultation</u> The TPB has consulted with all appropriate agencies. This includes the District of Columbia Environmental Regulation Administration, Maryland Department of the Environment, Maryland Department of Transportation, Maryland Office of Planning, Virginia Department of Environmental Quality, Virginia Department of Transportation, Federal Highway Administration, EPA, and county representatives of the counties of the Metropolitan Washington D.C. area.</p> <p><u>Public Consultation</u> The TPB has provided opportunities for public comment on the Conformity Determination. On October 9, 2008 the TPB released for public comment for 30 days, the draft air conformity analysis for the TIP and CLRP for thirty days. There were no comments relevant to air quality on the Conformity Determination.</p>

**Evaluation of the 2008 Constrained Long Range Plan and the FY2009-2014 Metropolitan Washington
Transportation Improvement Program**

GENERAL CRITERIA APPLICABLE TO THE TIP AND CLRP

93.106(a) (1)	Are the horizon years correct?	Y	The horizon years chosen, 2009, 2010, 2020 and 2030 represent appropriate horizon years for the 8-Hour Ozone, CO and PM2.5 conformity determination. 2010 is within the first 5 years of the transportation plan.
93.102(b)(2)(iv)	Has the EPA and the State made a finding that NOx is an insignificant contributor to the direct mobile PM emissions or does any applicable implementation plan (or implementation plan submission) fail to establish an approved (or adequate) NOx budget as part of a PM 2.5 reasonable further progress, attainment or maintenance strategy?	N	NOx is included in the PM emission analysis
93.102(b)(2)(v)	Has the EPA or State made a finding that VOCs, SOx or NH(3) as precursors to be a significant contributor to the mobile PM emissions or has an applicable implementation plan (or implementation plan submission) establish an approved (or adequate) budget for VOCs, SOx or NH(3) as part of a PM 2.5 reasonable further progress, attainment or maintenance strategy?	N	VOCs, SOx and NH(3) as precursors are not included in the emissions analysis

Evaluation of the 2008 Constrained Long Range Plan and the FY2009-2014 Metropolitan Washington Transportation Improvement Program

CRITERIA APPLICABLE ONLY TO THE CLRP

93.102(b)(3)	Has the EPA or the State made a finding that re-entrained road dust is a significant contributor to the PM mobile emissions or has an applicable implementation plan (or implementation plan submission) establish an approved (or adequate) budget that includes re-entrained road dust as part of a PM 2.5 reasonable further progress, attainment or maintenance strategy?	N	Re-entrained road dust is not included in the emissions analysis
93.106(a) (2)(i)	Does the plan quantify and document the demographic and employment factors influencing transportation demand?	Y	Pages 20-21 of the conformity determination summarizes; population, employment, and households for the Metropolitan Washington D.C. area. These forecasts were based upon the Round 7.1 forecast.
93.106(a) (2)(ii)	Is the highway and transit system adequately described in terms of the regionally significant additions or modifications to the existing transportation network which the transportation plan envisions to be operational in the horizon years?	Y	Appendix B of the conformity determination lists the projects and provides a description of the projects anticipated to be completed during the evaluation period of the conformity analysis
93.108	Is the transportation plan fiscally constrained?		EPA is deferring to TPB and the States of Maryland and Virginia and the District of Columbia's transportation agencies who have determined that the plan is fiscally constrained

93.113(b)	Are TCM's being implemented in a timely manner?	Y	All the TCMs listed in the Phase II Attainment Plan for the Metropolitan Washington D.C. area were implemented. The latest information regarding TCMs and other implementation plan measures effectiveness have been used.																														
93.118	For areas with SIP Budgets: is the Transportation Plan, TIP or Project consistent with the motor vehicle emissions budget(s) in the applicable SIP?	Y	<p>On April 4, 2005 (70 FR 16958) EPA approved the new CO maintenance Plan for the Washington, D.C. metropolitan area. The mobile budgets contained therein are applicable to this conformity determination.</p> <p>On May 13, 2005, (70 FR 25688) EPA approved the 2005 Attainment Plans for both Virginia and the District of Columbia. On November 16, 2005 (70 FR 69440) EPA approved the 2005 Attainment Plan for Maryland, therefore those mobile budgets are the applicable budgets to be used in this conformity determination. . All three of these attainment mobile budgets are identical.</p> <table border="0"> <tr> <td><u>2005 Mobile Budget:</u></td> <td><u>2009 Analysis</u></td> </tr> <tr> <td>97.4 T/D (VOC)</td> <td>68.2 T/D (VOC)</td> </tr> <tr> <td>234.7 T/D (NOx)</td> <td>151.5 T/D (NOx)</td> </tr> </table> <table border="0"> <tr> <td><u>2005 Mobile Budget:</u></td> <td><u>2010 Analysis</u></td> </tr> <tr> <td>97.4 T/D (VOC)</td> <td>63.9 T/D (VOC)</td> </tr> <tr> <td>234.7 T/D (NOx)</td> <td>133.5 T/D (NOx)</td> </tr> <tr> <td>1671.5 T/D (CO)</td> <td>695.4 T/D (CO)</td> </tr> </table> <table border="0"> <tr> <td><u>2005 Mobile Budget</u></td> <td><u>2020 Analysis</u></td> </tr> <tr> <td>97.4 T/D (VOC)</td> <td>39.3 T/D(VOC)</td> </tr> <tr> <td>234.7 T/D (NOx)</td> <td>47.2 T/D (NOx)</td> </tr> <tr> <td>1671.5 T/D (CO)</td> <td>579.0 T/D (CO)</td> </tr> </table> <table border="0"> <tr> <td><u>2005 Mobile Budget</u></td> <td><u>2030 Analysis</u></td> </tr> <tr> <td>97.4 T/D (VOC)</td> <td>37.5 T/D(VOC)</td> </tr> <tr> <td>234.7 T/D (NOx)</td> <td>34.8 T/D (NOx)</td> </tr> <tr> <td>1671.5 T/D (CO)</td> <td>587.4 T/D (CO)</td> </tr> </table>	<u>2005 Mobile Budget:</u>	<u>2009 Analysis</u>	97.4 T/D (VOC)	68.2 T/D (VOC)	234.7 T/D (NOx)	151.5 T/D (NOx)	<u>2005 Mobile Budget:</u>	<u>2010 Analysis</u>	97.4 T/D (VOC)	63.9 T/D (VOC)	234.7 T/D (NOx)	133.5 T/D (NOx)	1671.5 T/D (CO)	695.4 T/D (CO)	<u>2005 Mobile Budget</u>	<u>2020 Analysis</u>	97.4 T/D (VOC)	39.3 T/D(VOC)	234.7 T/D (NOx)	47.2 T/D (NOx)	1671.5 T/D (CO)	579.0 T/D (CO)	<u>2005 Mobile Budget</u>	<u>2030 Analysis</u>	97.4 T/D (VOC)	37.5 T/D(VOC)	234.7 T/D (NOx)	34.8 T/D (NOx)	1671.5 T/D (CO)	587.4 T/D (CO)
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**Evaluation of the 2008 Constrained Long Range Plan and the FY2009-2014 Metropolitan Washington
Transportation Improvement Program**

CRITERIA APPLICABLE ONLY TO THE CLRP

93.119	<p>For areas without emission budgets: Does the Transportation Plan, TIP or Project demonstrate contribution to emission reductions?</p>	Y	<p>There are no PM2.5 SIP budgets for the area, therefore an interim test of using the less than base year (2002) test analysis was conducted and the results are showed below. Under 93.109 (e), this interim test is permissible as the area had choice of either the less than base year test or build/no greater than build analysis for the area. The base year emissions are based on emissions modeling done by the TPB and agreed upon by the air agencies in the three jurisdictions and are shown as tons per year below. The analysis shows that the PM2.5 non-attainment area passes the interim emissions test.</p> <table border="0" style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: center;"><u>2002 BaseYear</u></td> <td style="text-align: center;"><u>2009 Analysis</u></td> </tr> <tr> <td style="text-align: center;">1702.8 tpy (Direct PM)</td> <td style="text-align: center;">1095.1 tpy (Direct PM)</td> </tr> <tr> <td style="text-align: center;">96220.0 tpy (NOx)</td> <td style="text-align: center;">51633.7 tpy (NOx)</td> </tr> <tr> <td colspan="2"> </td> </tr> <tr> <td style="text-align: center;"><u>2002 Base Year</u></td> <td style="text-align: center;"><u>2010 Analysis</u></td> </tr> <tr> <td style="text-align: center;">1702.8 tpy (Direct PM)</td> <td style="text-align: center;">1.031.3 tpy (Direct PM)</td> </tr> <tr> <td style="text-align: center;">96220.0 tpy (NOx)</td> <td style="text-align: center;">45855.2 tpy (NOx)</td> </tr> <tr> <td colspan="2"> </td> </tr> <tr> <td style="text-align: center;"><u>2002 Base Year</u></td> <td style="text-align: center;"><u>2020 Analysis</u></td> </tr> <tr> <td style="text-align: center;">1702.8 tpy (Direct PM)</td> <td style="text-align: center;">729.1 tpy (Direct PM)</td> </tr> <tr> <td style="text-align: center;">96220.0 tpy (NOx)</td> <td style="text-align: center;">16177.4 tpy (NOx)</td> </tr> <tr> <td colspan="2"> </td> </tr> <tr> <td style="text-align: center;"><u>2002 Base Year</u></td> <td style="text-align: center;"><u>2030 Analysis</u></td> </tr> <tr> <td style="text-align: center;">1702.8 tpy (Direct PM)</td> <td style="text-align: center;">728.0 tpy (Direct PM)</td> </tr> <tr> <td style="text-align: center;">96220.0 tpy (NOx)</td> <td style="text-align: center;">11955.4 tpy (NOx)</td> </tr> </table>	<u>2002 BaseYear</u>	<u>2009 Analysis</u>	1702.8 tpy (Direct PM)	1095.1 tpy (Direct PM)	96220.0 tpy (NOx)	51633.7 tpy (NOx)			<u>2002 Base Year</u>	<u>2010 Analysis</u>	1702.8 tpy (Direct PM)	1.031.3 tpy (Direct PM)	96220.0 tpy (NOx)	45855.2 tpy (NOx)			<u>2002 Base Year</u>	<u>2020 Analysis</u>	1702.8 tpy (Direct PM)	729.1 tpy (Direct PM)	96220.0 tpy (NOx)	16177.4 tpy (NOx)			<u>2002 Base Year</u>	<u>2030 Analysis</u>	1702.8 tpy (Direct PM)	728.0 tpy (Direct PM)	96220.0 tpy (NOx)	11955.4 tpy (NOx)
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Evaluation of the 2008 Constrained Long Range Plan and the FY2009-2014 Metropolitan Washington Transportation Improvement Program

CRITERIA APPLICABLE ONLY TO THE TIP

93.102(b)(2)(iv)	Has the EPA and the State made a finding that NOx is an insignificant contributor to the direct mobile PM emissions or does any applicable implementation plan (or implementation plan submission) fail to establish an approved (or adequate) NOx budget as part of a PM 2.5 reasonable further progress, attainment or maintenance strategy?	N	NOx is included in the PM emission analysis
93.102(b)(2)(v)	Has the EPA or State made a finding that VOCs, SOx or NH(3) as precursors to be a significant contributor to the mobile PM emissions or has an applicable implementation plan (or implementation plan submission) establish an approved (or adequate) budget for VOCs, SOx or NH(3) as part of a PM 2.5 reasonable further progress, attainment or maintenance strategy?	N	VOCs, SOx and NH(3) as precursors are not included in the emissions analysis
93.102(b)(3)	Has the EPA or the State made a finding that re-entrained road dust is a significant contributor to the PM mobile emissions or has an applicable implementation plan (or implementation plan submission) establish an approved (or adequate) budget that includes re-entrained road dust as part of a PM 2.5 reasonable further progress, attainment or maintenance strategy?	N	Re-entrained road dust is not included in the emissions analysis

93.113(b)	Are TCM's being implemented in a timely manner?	Y	All the TCMs listed in the Phase II Attainment Plan for the Metropolitan Washington D.C. area were implemented. The latest information regarding TCMs and other implementation plan measures effectiveness have been used.																														
93.118	For areas with SIP Budgets: is the Transportation Plan, TIP or Project consistent with the motor vehicle emissions budget(s) in the applicable SIP?	Y	<p>On April 4, 2005 (70 FR 16958) EPA approved the new CO maintenance Plan for the Washington, D.C. metropolitan area. The mobile budgets contained therein are applicable to this conformity determination.</p> <p>On May 13, 2005, (70 FR 25688) EPA approved the 2005 Attainment Plans for both Virginia and the District of Columbia. On November 16, 2005 (70 FR 69440) EPA approved the 2005 Attainment Plan for Maryland, therefore those mobile budgets are the applicable budgets to be used in this conformity determination. All three of these attainment mobile budgets are identical.</p> <table border="0"> <tr> <td><u>2005 Mobile Budget:</u></td> <td><u>2009 Analysis</u></td> </tr> <tr> <td>97.4 T/D (VOC)</td> <td>68.2 T/D (VOC)</td> </tr> <tr> <td>234.7 T/D (NOx)</td> <td>151.5 T/D (NOx)</td> </tr> </table> <table border="0"> <tr> <td><u>2005 Mobile Budget:</u></td> <td><u>2010 Analysis</u></td> </tr> <tr> <td>97.4 T/D (VOC)</td> <td>63.9 T/D (VOC)</td> </tr> <tr> <td>234.7 T/D (NOx)</td> <td>133.5 T/D (NOx)</td> </tr> <tr> <td>1671.5 T/D (CO)</td> <td>695.4 T/D (CO)</td> </tr> </table> <table border="0"> <tr> <td><u>2005 Mobile Budget</u></td> <td><u>2020 Analysis</u></td> </tr> <tr> <td>97.4 T/D (VOC)</td> <td>39.3 T/D(VOC)</td> </tr> <tr> <td>234.7 T/D (NOx)</td> <td>47.2 T/D (NOx)</td> </tr> <tr> <td>1671.5 T/D (CO)</td> <td>579.0 T/D (CO)</td> </tr> </table> <table border="0"> <tr> <td><u>2005 Mobile Budget</u></td> <td><u>2030 Analysis</u></td> </tr> <tr> <td>97.4 T/D (VOC)</td> <td>37.5 T/D(VOC)</td> </tr> <tr> <td>234.7 T/D (NOx)</td> <td>34.8 T/D (NOx)</td> </tr> <tr> <td>1671.5 T/ D (CO)</td> <td>587.4 T/D (CO)</td> </tr> </table>	<u>2005 Mobile Budget:</u>	<u>2009 Analysis</u>	97.4 T/D (VOC)	68.2 T/D (VOC)	234.7 T/D (NOx)	151.5 T/D (NOx)	<u>2005 Mobile Budget:</u>	<u>2010 Analysis</u>	97.4 T/D (VOC)	63.9 T/D (VOC)	234.7 T/D (NOx)	133.5 T/D (NOx)	1671.5 T/D (CO)	695.4 T/D (CO)	<u>2005 Mobile Budget</u>	<u>2020 Analysis</u>	97.4 T/D (VOC)	39.3 T/D(VOC)	234.7 T/D (NOx)	47.2 T/D (NOx)	1671.5 T/D (CO)	579.0 T/D (CO)	<u>2005 Mobile Budget</u>	<u>2030 Analysis</u>	97.4 T/D (VOC)	37.5 T/D(VOC)	234.7 T/D (NOx)	34.8 T/D (NOx)	1671.5 T/ D (CO)	587.4 T/D (CO)
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93.119	For areas without emission budgets: Does the Transportation Plan, TIP or Project demonstrate contribution to emission reductions?	Y	<p>There are no PM2.5 SIP budgets for the area, therefore an interim test of using the less than base year (2002) test analysis was conducted and the results are shown below. Under 93.109 (e), this interim test is permissible as the area had choice of either the less than base year test or build/no greater than build analysis for the area. The base year emissions are based on emissions modeling done by the TPB and agreed upon by the air agencies in the three jurisdictions and are shown as tons per year below. The analysis shows that the PM2.5 non-attainment area passes the interim emissions test.</p> <table border="0"> <tr> <td><u>2002 Base Year</u></td> <td><u>2009 Analysis</u></td> </tr> <tr> <td>1702.8 tpy (Direct PM)</td> <td>1095.1 tpy (Direct PM)</td> </tr> <tr> <td>96220.0 tpy (NOx)</td> <td>51633.7 tpy (NOx)</td> </tr> <tr> <td> </td> <td></td> </tr> <tr> <td><u>2002 Base Year</u></td> <td><u>2010 Analysis</u></td> </tr> <tr> <td>1702.8 tpy (Direct PM)</td> <td>1.031.3 tpy (Direct PM)</td> </tr> <tr> <td>96220.0 tpy (NOx)</td> <td>45855.2 tpy (NOx)</td> </tr> <tr> <td> </td> <td></td> </tr> <tr> <td><u>2002 Base Year</u></td> <td><u>2020 Analysis</u></td> </tr> <tr> <td>1702.8 tpy (Direct PM)</td> <td>729.1 tpy (Direct PM)</td> </tr> <tr> <td>96220.0 tpy (NOx)</td> <td>16177.4 tpy (NOx)</td> </tr> <tr> <td> </td> <td></td> </tr> <tr> <td><u>2002 Base Year</u></td> <td><u>2030 Analysis</u></td> </tr> <tr> <td>1702.8 tpy (Direct PM)</td> <td>728.0 tpy (Direct PM)</td> </tr> <tr> <td>96220.0 tpy (NOx)</td> <td>11955.4 tpy (NOx)</td> </tr> </table>	<u>2002 Base Year</u>	<u>2009 Analysis</u>	1702.8 tpy (Direct PM)	1095.1 tpy (Direct PM)	96220.0 tpy (NOx)	51633.7 tpy (NOx)	 		<u>2002 Base Year</u>	<u>2010 Analysis</u>	1702.8 tpy (Direct PM)	1.031.3 tpy (Direct PM)	96220.0 tpy (NOx)	45855.2 tpy (NOx)	 		<u>2002 Base Year</u>	<u>2020 Analysis</u>	1702.8 tpy (Direct PM)	729.1 tpy (Direct PM)	96220.0 tpy (NOx)	16177.4 tpy (NOx)	 		<u>2002 Base Year</u>	<u>2030 Analysis</u>	1702.8 tpy (Direct PM)	728.0 tpy (Direct PM)	96220.0 tpy (NOx)	11955.4 tpy (NOx)
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CONCLUSION

Pursuant to FHWA's December 11, 2008 request, we have reviewed the 8-Hour Ozone, Carbon Monoxide and PM2.5 conformity determinations for the 2008 Constrained Long Range Plan and the FY2009-2014 Metropolitan Washington Transportation Improvement Program prepared by the Metropolitan Washington Council of Governments, National Capital Region Transportation Planning Board. We have determined that the 2008 Constrained Long Range Plan and the FY2009-2014 Metropolitan Washington Transportation Improvement Program meet the requirements of the federal conformity rule.