

ITEM 9–Action
October 18, 2017

Approval of the Air Quality Conformity Analysis of the VDOT and MDOT Off-Cycle Amendment to the 2016 CLRP and Approval of the 2016 Off-Cycle Amendment

Staff

Recommendation: Adopt Resolution R3-2018 finding that the 2016 CLRP conforms with the requirements of the Clean Air Act Amendments of 1990, and adopt Resolution R4-2018 approving the VDOT and MDOT Off-Cycle Amendment to the 2016 CLRP.

Issues: None

Background: On September 14, the Air Quality Conformity Analysis of the 2016 CLRP Amendment and the 2016 Off-Cycle Amendment were released for a 30-day public comment which ended on October 14. At the September 20 meeting, the board was briefed on the Air Quality Conformity Analysis of the Virginia Department of Transportation (VDOT) and Maryland Department of Transportation (MDOT) Off-Cycle Amendment to the 2016 CLRP.

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

RESOLUTION FINDING THAT THE VIRGINIA DEPARTMENT OF TRANSPORTATION (VDOT)
AND THE MARYLAND DEPARTMENT OF TRANSPORTATION (MDOT)
OFF-CYCLE AMENDMENT TO THE 2016 CONSTRAINED LONG RANGE PLAN
CONFORM WITH THE REQUIREMENTS OF THE CLEAN AIR ACT AMENDMENTS OF 1990

WHEREAS, the National Capital Region Transportation Planning Board (TPB) has been designated by the Governors of Maryland and Virginia and the Mayor of the District of Columbia as the Metropolitan Planning Organization (MPO) for the Washington Metropolitan Area; and

WHEREAS, the U.S. Environmental Protection Agency (EPA), in conjunction with the U.S. Department of Transportation (DOT), under the Clean Air Act Amendments of 1990 (CAA), issued on November 24, 1993 "Criteria and Procedures for Determining Conformity to State or Federal Implementation Plans of Transportation Plans, Programs, and Projects Funded or Approved Under Title 23 U.S.C. or the Federal Transit Act," and, over the years, subsequently amended these regulations and provided additional guidance, which taken together provide the specific criteria for TPB to make a determination of conformity of its financially Constrained Long Range Transportation Plan (CLRP) and Transportation Improvement Program (TIP) with the state implementation plans (SIPs) for air quality attainment within the Metropolitan Washington non-attainment area; and

WHEREAS, a scope of work was developed to address all procedures and requirements, including public and interagency consultation, and the scope was released for public comment on March 9, 2017 and approved by the TPB at its April 19, 2017 meeting; and

WHEREAS, VDOT and MDOT project inputs submitted for inclusion in the air quality conformity analysis of the off-cycle amendment, including two options for VDOT's I-66 outside the Beltway project, were released for public comment on March 9, 2017, and approved by the TPB in Resolution R20-2017 at its April 19, 2017 meeting with the agreement that the TPB would give the Fairfax County Board of Supervisors a chance to meet and review access points on I-66 outside the Beltway east of the US Route 50 interchange, and that if the Fairfax Board of Supervisors moved to change any access points, the TPB staff would adhere to the recommendations; and

WHEREAS, the Fairfax County Board of Supervisors approved a resolution on May 16, 2017, taking a position on proposed changes to access points on I-66 outside the Beltway east of the US Route 50 interchange, and those changes were incorporated as inputs to the off-cycle conformity analysis; and

WHEREAS, MDOT requested that an additional project be included in the off-cycle CLRP amendment, and following a comment period from April 13, 2017 to May 13, 2017, the project was approved by the TPB at its May 17, 2017 meeting; and

WHEREAS, on September 14, 2017, the draft results of the Air Quality Conformity Analysis of the VDOT and MDOT off-cycle Amendment to the 2016 CLRP were released for a 30-day public comment period and inter-agency review; and

WHEREAS, in the attached letter of October 11, 2017, VDOT selected Option A as the alternative that will be included for the I-66 outside the Beltway project in the VDOT and MDOT Amendment to the 2016 CLRP; and

WHEREAS, the analysis reported in *Air Quality Conformity Analysis: VDOT and MDOT Amendment to the 2016 Constrained Long Range Plan* dated October 18, 2017, demonstrates adherence to all mobile source emissions budgets for ground level ozone precursors Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx), and meets all regulatory, planning, and interagency consultation requirements, and therefore provides the basis for a finding of conformity of the plan with the requirements of the CAAA; and

WHEREAS, in the attached letter of October 11, 2017, the Metropolitan Washington Air Quality Committee (MWAQC) has provided favorable comments on the *Air Quality Conformity Analysis: VDOT and MDOT Amendment to the 2016 Constrained Long Range Plan*;

NOW, THEREFORE, BE IT RESOLVED THAT THE NATIONAL CAPITAL REGION TRANSPORTATION PLANNING BOARD determines that the VDOT and MDOT Amendment to the 2016 Constrained Long Range Plan conforms to all requirements of the Clean Air Act Amendments of 1990.

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

**RESOLUTION APPROVING THE
VIRGINIA DEPARTMENT OF TRANSPORTATION (VDOT)
AND THE MARYLAND DEPARTMENT OF TRANSPORTATION (MDOT)
OFF-CYCLE AMENDMENT TO THE 2016 CONSTRAINED LONG RANGE PLAN
FOR THE NATIONAL CAPITAL REGION**

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 Fixing America's Surface Transportation (FAST) Act for developing and carrying out a continuing, cooperative and comprehensive transportation planning process for the Metropolitan Area; and

WHEREAS, the Federal Planning Regulations of the Federal Transit Administration (FTA) and the Federal Highway Administration (FHWA) implementing the FAST Act, which became effective June 27, 2016, specify the development and content of the long range transportation plan and require that it be reviewed and updated at least every four years; and

WHEREAS, on November 16, 2016, the TPB approved the 2016 Amendment to the Constrained Long-Range Transportation Plan (CLRP), which was developed as specified in the Federal Planning Regulations; and

WHEREAS, VDOT and MDOT requested an off-cycle amendment to the 2016 CLRP and provided project inputs for inclusion in the air quality conformity analysis, including two options for VDOT's I-66 outside the Beltway project; and

WHEREAS, on April 19, 2017, the TPB approved the project inputs for the conformity analysis of the VDOT and MDOT off-cycle amendment to the 2016 CLRP with the agreement that the TPB would give the Fairfax County Board of Supervisors a chance to meet and review access points on I-66 outside the Beltway east of the US Route 50 interchange, and that if the Fairfax Board of Supervisors moved to change any access points, the TPB staff would adhere to the recommendations; and

WHEREAS, on May 16, 2017, the Fairfax County Board of Supervisors approved a resolution taking a position on proposed changes to access points on I-66 outside the Beltway east of the US Route 50 interchange, and those changes were incorporated as inputs to the off-cycle conformity analysis; and

WHEREAS, MDOT requested that an additional project be included in the off-cycle CLRP amendment, and the project was approved by the TPB at its May 17, 2017 meeting; and

WHEREAS, on September 14, 2017, the draft results of the Air Quality Conformity Analysis of the VDOT and MDOT off-cycle amendment to the 2016 CLRP were released for a 30-day public comment period and inter-agency review; and

WHEREAS, the project details for the VDOT and MDOT off-cycle amendment to the 2016 CLRP were provided at the April and May TPB meetings and were included on the TPB website in Appendix A of the Air Quality Conformity Analysis report; and

WHEREAS, in the attached letter of October 11, 2017 VDOT selected Option A as the alternative that will be included for the I-66 outside the Beltway project in the VDOT and MDOT Amendment to the 2016 CLRP; and

WHEREAS, during the development of the VDOT and MDOT off-cycle amendment to the 2016 CLRP, the TPB Participation Plan was followed, and several opportunities were provided for public comment: (1) At the March 9, 2017 TPB Citizens Advisory Committee (CAC) meeting, the project submissions for inclusion in the air quality conformity analysis and the air quality conformity work scope were released, and an opportunity for public comment on these submissions was provided at the beginning of the March and April TPB meetings; (2) At the April 19, 2017 meeting, the TPB accepted a set of responses to the public comments on the project submissions for inclusion in the CLRP; (3) On September 14, 2017 in conjunction with the CAC meeting, the draft VDOT and MDOT off-cycle amendment to the 2016 CLRP and the draft air quality conformity analysis were released for a 30-day public comment period, which closed on October 14, 2017; (4) On October 10, 2017 the amendment and results of the conformity analysis were presented to the Metropolitan Washington Air Quality Committee Technical Advisory Committee for its consideration and comment; (5) An opportunity for public comment on these documents was provided on the TPB website and at the beginning of the September and October TPB meetings; and (6) the documentation of the VDOT and MDOT off-cycle amendment to the 2016 CLRP will include summaries of all comments and responses; and

WHEREAS, on October 18, 2017, the TPB determined that the VDOT and MDOT amendment to the 2016 CLRP conforms with the requirements of the Clean Air Act Amendments of 1990; and

WHEREAS, the TPB Technical Committee has recommended favorable action on the VDOT and MDOT amendment to the 2016 CLRP by the Board;

NOW, THEREFORE, BE IT RESOLVED THAT the National Capital Region Transportation Planning Board approves the Virginia Department of Transportation and Maryland Department of Transportation off-cycle amendment to the 2016 Constrained Long-Range Transportation Plan for the National Capital Region to include:

- Modification (Option A) to the I-66 Outside the Beltway project
- Addition of a new I-95 Northbound HOT lane Exit Ramp at Russell Rd.
- Modification of the completion date of the Governor Nice Bridge to 2023
- Addition of the I-270 Innovative Congestion Management Project

as described in Appendix A of the Air Quality Conformity Analysis report, which is provided on the TPB website.



MEMORANDUM

TO: Transportation Planning Board
FROM: Jane Posey, TPB Transportation Engineer
SUBJECT: VDOT and MDOT Off-Cycle Amendment to the 2016 CLRP
DATE: October 12, 2017

On September 14, 2017, the TPB released the draft Virginia Department of Transportation (VDOT) and Maryland Department of Transportation (MDOT) Off-Cycle Amendment to the 2016 Constrained Long Range Plan (CLRP) and the draft air quality conformity analysis results for a 30-day public comment period, which ended on October 14. The results of the conformity analysis are provided in the draft conformity report, *Air Quality Conformity Analysis: VDOT and MDOT Amendment to the 2016 Constrained Long Range Plan*, which is available on the TPB website. As presented to TPB in September, the TPB staff has found that the Air Quality Conformity Analysis demonstrates adherence to all mobile source emissions budgets for the pollutants analyzed. This memorandum provides a summary of the project inputs, highlights conformity comments made by the Metropolitan Washington Air Quality Committee, and provides information on actions related to this amendment to the 2016 CLRP.

The TPB will be asked to approve the air quality conformity analysis and the VDOT and MDOT amendment to the 2016 CLRP at its October 18, 2017 meeting.

AMENDMENT PROJECT INPUTS

At the April 19, 2017 meeting, after a 30-day comment period, the TPB approved the project amendments submitted by VDOT and MDOT, as well as the Scope of Work for the air quality conformity analysis. The TPB made additional modifications to the project inputs at its May 17, 2017 meeting. Detailed information about the inputs is included in Appendix A of the conformity report.

VDOT's inputs included a new ramp on I-95 and modifications to the I-66 outside the Beltway HOT lanes project. The I-95 project involves the construction of an additional northbound off-ramp from the I-95 HOT lanes to serve the area near the Marine Corps Base Quantico in Prince William County. The new ramp will provide direct access from the northbound HOT lanes to Russell Road.

The modifications to the I-66 outside the Beltway HOT lanes project reflected changes to the Commonwealth Transportation Board's (CTB) "preferred alternative", which is the alternative included in the 2016 CLRP. VDOT's inputs for the amendment included two options for the I-66 outside the Beltway project, Option A and Option B. Option A reflected the technical proposal provided by the developer. Option B included the access points in Option A, plus some potential additional access points that were under consideration by the developer and VDOT. VDOT had agreed to select one of these options for advancement to the TPB in October, and recently requested that Option A be retained as the alternative for this amendment to the 2016 CLRP. A letter from VDOT to the TPB indicating the selection of Option A is attached (Attachment A).

MDOT's inputs included a change to the completion date of the widening of the Governor Harry Nice Bridge and implementation of the I-270 Innovative Congestion Management Project. The construction of a new 4-lane Governor Harry Nice bridge to replace the current 2-lane structure is already included in the current 2016 CLRP. MDOT modified the construction timeline to reflect a completion date of 2023 instead of 2030. The I-270 Innovative Congestion Management Project includes fourteen roadway improvements and innovative technologies and techniques, comprised of adaptive ramp metering, active traffic management and virtual weigh stations. The limits of the project are from I-495 to I-70, and include the east and west spurs of I-270. In April, when the TPB approved the Governor Nice Bridge modification, the MDOT requested the inclusion of the I-270 project in the off-cycle conformity analysis. The TPB approved the inclusion of the I-270 project in May.

CONFORMITY ANALYSIS

As outlined in the Scope of Work, TPB staff performed the air quality assessment and found that the VDOT and MDOT amendment to the 2016 CLRP meets all conformity requirements. The conformity report, which contains the detailed analysis and findings is available on the COG website at [https://www.mwcog.org/assets/1/28/09202017 - Item 13 - 2016 CLRP Amendment Off-Cycle Air Quality Conformity Report.pdf](https://www.mwcog.org/assets/1/28/09202017_-_Item_13_-_2016_CLRP_Amendment_Off-Cycle_Air_Quality_Conformity_Report.pdf).

COMMENTS / RESPONSE TO COMMENTS

Comment: The Metropolitan Washington Air Quality Committee (MWAQC) provided written comments in the attached October 11, 2017 letter (see Attachment B). The letter states that MWAQC concurs that the transportation-sector emissions associated with the transportation plan meet the motor vehicle emissions budgets for ozone season pollutants, as is necessary to meet conformity requirements. The Committee points out that the region has made significant progress in reducing emissions of ozone precursors, and that the region has now met the 2008 ozone standard of 75 parts per billion (ppb). MWAQC notes that the region is in the final stages of developing a request for EPA to redesignate the area to attainment for the 2008 ozone standard which includes a plan showing how the region will maintain the standard in the future. The maintenance plan will include new motor vehicle emissions budgets. MWAQC mentions EPA's new ozone standard of 70 ppb, and notes that, with the current level for ozone at 72 ppb, the region will need to continue to work towards meeting that standard. MWAQC notes that EPA recently proposed to reconsider the final determination of the mid-term evaluation of the greenhouse gas (GHG) standards for light-duty motor vehicles and appreciates the TPB's position to maintain the existing standards promulgated in 2012. MWAQC comments positively on the continued VMT per capita reductions in the region, and urges TPB's continued investment in programs to mitigate future growth in vehicle emissions. MWAQC also urges the TPB to maintain its commitments to TERMS and other emissions reduction measures.

Response: The TPB appreciates MWAQC's concurrence that the air quality conformity analysis of the VDOT and MDOT off-cycle amendment to the 2016 CLRP meets all of the federal requirements. The TPB agrees that there should be a continued effort to reduce emissions across all sectors to meet current and future standards. The TPB looks forward to working with MWAQC in the development of plans to assist with the continued improvement of air quality in the region. The TPB also agrees with MWAQC on the need for continued investment in public transit, ridesharing, and other initiatives to reduce emissions. The TPB supports maintenance of commitments to TERMS and other cost-effective emissions reduction measures.

NEXT STEPS

The VDOT and MDOT amendment and the air quality conformity analysis results were released for a 30-day comment period on September 14, 2017, which ended on October 14. The TPB will be briefed on the comments received and the recommended responses, and asked to approve the air quality conformity analysis and the VDOT and MDOT amendment to the 2016 CLRP at its October 18, 2017 meeting.



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION

4975 Alliance Drive
Fairfax, VA 22030

CHARLES A. KILPATRICK, P.E.
COMMISSIONER

October 11, 2017

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

Subject: I-66 Corridor Improvements Outside the Beltway

Dear Chairwoman Newton:

On March 7, 2017, the Virginia Department of Transportation (VDOT) and its I-66 P3 project development partner, Express Mobility Partners (EMP), submitted I-66 Access Options A and B to the Transportation Planning Board (TPB) for inclusion in an off-cycle air quality conformity analysis and amendment to the 2016 Constrained Long Range Plan (CLRP). Option A reflects the technical proposal provided by EMP. Option B includes the access points in Option A, plus some potential additional access points that were under consideration by EMP and VDOT. On April 19, 2017, the TPB adopted Resolution R20-2017 approving projects submitted by VDOT and the Maryland Department of Transportation (MDOT) to be included in an off-cycle air quality conformity analysis of the 2016 CLRP Amendment and the FY2017-2022 Transportation Improvement Program (TIP), pending concurrence from the Fairfax County Board of Supervisors for access changes on I-66 between US 50 and I-495.

Since then VDOT and EMP have continued with project development activities for the I-66 project and have held public information meetings in June, as well as over 40 briefings with local stakeholders and communities. Based on the results of further conceptual design development, and in response to input from local jurisdictions, the public, and stakeholders, VDOT and EMP have selected Option A for the I-66 Outside the Beltway project.

We are writing to request that the TPB, upon completion of its public comment period and review of the 2017 CLRP Air Quality Analysis, approve the analysis and adopt the 2017 CLRP amendment with the inclusion of Option A for the I-66 Outside the Beltway project. This action by the TPB is needed to allow VDOT to complete its reevaluation of the previous environmental assessment studies and secure federal approval before proceeding to the final design and construction. Any subsequent difference between Option A and the final design of the project will be reflected in a future update to the TPB's CLRP.

Option A differs from what is included in the approved 2016 CLRP Amendment (the locally preferred alternative) in three locations:

- 1) East of Virginia Route 234 Business, braided ramps will provide access from the eastbound I-66 general purpose lanes to the eastbound express lanes and from the westbound express lanes to the westbound general purpose lanes.
- 2) At the interchange with Virginia Route 123, two ramps will provide direct express lanes access to and from the west.
- 3) At the I-495 interchange, additional access will be provided from the eastbound express lanes to the northbound I-495 general purpose lanes and from the I-495 southbound general purpose lanes to the westbound I-66 express lanes.

Option A retains an important feature of the locally preferred alternative: the preservation of right-of-way in the median of I-66 between Route 28 and I-495, so as not to preclude the future extension of the Metrorail Orange Line or other transit options in the median. Consistent with the 2016 CLRP, Option A includes a phased approach for implementing the locally preferred alternative. The phased elements for the project would be constructed by 2040, and include: median widening to accommodate future transit in the median between Route 28 and Gainesville; additional express lanes access points in Prince William County; and a 4-mile extension of the western project limits from Gainesville to Haymarket.

VDOT and EMP project staff have consulted with appropriate representatives of the Virginia Division Office of the Federal Highway Administration (FHWA) regarding Option A. FHWA staff reviewed Option A relative to the locally preferred alternative and concurred with VDOT's and EMP's plan to proceed with including Option A in the TPB's 2017 amendment to the CLRP and regional air quality conformity analysis, with the understanding that any difference between Option A and the final design of the project would be reflected in a future update to the TPB's CLRP. VDOT and EMP subsequently briefed TPB staff on elements of Option A, VDOT's and EMP's determination that operationally it resembles the locally preferred alternative, and the feedback received from the FHWA Virginia Division.

VDOT will be presenting the access concept consistent with Option A to the Commonwealth Transportation Board (CTB) on October 23, 2017, as the recommended design to advance forward. Design Public Hearings are scheduled for November 13, 14, and 16, and the CTB is scheduled to take action on the approval of the limited access control changes associated with the updated design on December 5, 2017. Following the CTB action, VDOT plans to seek FHWA approval of a reevaluation of the approved 2016 Environmental Assessment for the design changes included in Option A.


VDOT remains committed to keeping the TPB and its member jurisdictions informed about the various milestones of ongoing project development and implementation. VDOT also remains committed to working with the TPB to ensure that any potential differences in the operational elements of the project's final design and Option A will be reflected in subsequent amendments to the CLRP and updates of the regional air quality conformity analysis, should they be necessary.

The Honorable Bridget Newton, Chairwoman
October 11, 2017
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We thank you and the Board for accommodating VDOT's earlier request to evaluate both Options A and B for the I-66 Outside the Beltway project as part of the regional air quality conformity analysis, and request inclusion of Option A in the 2017 CLRP Amendment. As

always, please let me know if I can be of further assistance in addressing any questions or comments members of the Board may have on this matter.

Sincerely,


for Helen Cuervo, P.E.
District Administrator - VDOT Northern Virginia

cc: Renée Hamilton
Deputy District Administrator, VDOT Northern Virginia

October 11, 2017

Honorable Bridget Donnell Newton, Chair
National Capital Region Transportation Planning Board
777 North Capitol Street, NE, Suite 300
Washington, D.C. 20002

Dear Chair Newton:

Thank you for providing an opportunity to the Metropolitan Washington Air Quality Committee (MWAQC) to comment on the draft amended 2016 Constrained Long Range Plan (CLRP) and the FY2017-2022 Transportation Improvement Program (TIP). MWAQC has reviewed the draft Air Quality Conformity assessment and concurs that the transportation sector emissions associated with the proposed transportation plans meet the motor vehicle emissions budgets (MVEBs) approved for the 1997 8-hour ozone national ambient air quality standard (NAAQS).

The Washington region has made significant progress in reducing emissions of ozone precursors such as, volatile organic compounds (VOC) and nitrogen oxides (NO_x) from both transportation and non-transportation sectors over the years. As a result, the region met the 2008 ozone standard of 75 parts per billion (ppb) based on the data for the period 2012 through 2014. The region is currently in the final stages of developing a request for EPA to redesignate the area to attainment for the 2008 ozone standard along with a required demonstration to maintain compliance in the future (maintenance plan).

The Washington region developed a draft set of MVEBs for VOC and NO_x as part of the maintenance plan for the 2008 ozone standard using EPA's latest MOVES2014a model. These MVEBs will replace the currently used MVEBs, which were developed earlier using Mobile6.2 model. The MOVES2014a model includes the recently published Tier 3 vehicle emission and fuel standards rule as well as two greenhouse gas rules for motor vehicles.

However, MWAQC also notes that EPA published a revised and tougher health based ozone standard of 70 ppb in October 2015. The draft data for the period 2015 through 2017 shows the region's design value for ozone at 72 ppb. This indicates that even though the region has made significant progress in reducing emissions, it needs to continue its efforts in order to meet the 2015 ozone standard. While the recently adopted Tier 3 program will provide significant emissions reduction benefits from the transportation sector, MWAQC will need the support and cooperation of TPB to examine emissions and to identify new cost-effective strategies and opportunities to reduce on-road mobile emissions further in order to continue progress towards meeting the ozone standard. This is important as EPA recently proposed to reconsider the final determination of the mid-term evaluation of the greenhouse gas (GHG) standards for the light-duty motor vehicles for the model years 2022-2025. In this respect, MWAQC very much appreciates TPB's stand to maintain the existing GHG emission standards promulgated in 2012, which could also help in reducing emissions of ozone precursors namely, volatile organic compounds (VOCs) and nitrogen oxides (NO_x).

The Honorable Bridget Donnell Newton
October 11, 2017

MWAQC is encouraged to learn that the region is actually achieving reductions in per capita vehicle miles travelled (VMT), even with an increase in employment. However, the region is experiencing an increase in total VMT as the population grows. Therefore, we urge TPB's continued investment in VMT and emission reduction strategies such as public transit, including all needed investments in Metro, ride-sharing, pedestrian and bike infrastructure, and other travel demand management strategies to continue to mitigate future growth in vehicle emissions. MWAQC strongly urges TPB to maintain its commitments to Transportation Emission Reduction Measures and other emission reduction measures. All of these efforts are essential to meet the 2015 ozone standard.

Thank you again for the opportunity to comment on the draft conformity analysis.

Sincerely,

A handwritten signature in black ink, appearing to be 'H. Reimer', written on a light-colored background.

Hon. Hans Reimer
Chair, Metropolitan Washington Air Quality Committee