Item #5

MEMORANDUM

January 15, 2015

TO: Transportation Planning Board

FROM: Kanti Srikanth
Director, Department of Transportation Planning

RE: Letters Sent/Received Since the December 17th TPB Meeting

The attached letters were sent/received since the December 17th TPB meeting. The letters will be reviewed under Agenda #5 of the January 21st TPB agenda.

Attachments

Sent via email

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
202-219-3570
202-219-3545 (fax)

January 5, 2015

The Honorable Patrick Wojahn, Chairman
National Capital Region Transportation Planning Board
c/o Mr. Kanti Srikanth, Director of Transportation Planning
Metropolitan Washington Council of Governments
777 North Capital Street, NW, Suite 300
Washington, D.C. 20002-4201

Re: Air Quality Conformity Determination for the 2014 Constrained Long Range Plan (CLRP) and the Fiscal Year (FY) 2015-2020 Transportation Improvement Program (TIP) for the Washington Metropolitan Region

Dear Chairman Wojahn:

The 1990 Amendments to the Clean Air Act require transportation air quality conformity determinations for Metropolitan Transportation Plans, Transportation Improvement Programs (TIP), sections of a State Transportation Improvement Program (STIP) covering rural nonattainment/maintenance areas, and projects in areas that are designated as air quality nonattainment and maintenance areas. Section 176 (d) of the Clean Air Act establishes priority requirements for programs supported by the Federal government that target nonattainment or maintenance areas in order to provide for timely implementation of eligible portions of air quality plans.

The Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) coordinated the transportation air quality conformity determinations submittal with the Environmental Protection Agency (EPA) and are jointly making this air quality conformity determination. This determination was triggered as a result of having completed the review of the 2014 Constrained Long Range Plan (CLRP) and the Fiscal Year (FY) 2015-2020 TIP for the Washington Metropolitan Region. The last air quality conformity determination for the 2013 CLRP and 2013-2018 TIP was made on January 22, 2014. On December 9, 2014, in a letter to FHWA's District of Columbia Division regarding the review of the 1997 8-Hour Ozone, 2008 8-hour Ozone, Carbon Monoxide and 1997 Fine Particulate Matter (PM 2.5) Standards Conformity (enclosed), the EPA acknowledged its review and included technical documentation that supports the conformity finding of the region's 2014 CLRP.

FTA and FHWA find that the analytical results provided by the Transportation Planning Board (TPB) to demonstrate conformity are consistent with EPA's Transportation Conformity Rule (40

CFR Part 93), as amended. FTA and FHWA find that the 2014 CLRP and 2015-2020 TIP conform to the region's State Implementation Plans, and that the conformity determination has been performed in accordance with the requirements specified in the Transportation Conformity Rule (40 CFR Part 93), as amended.

FTA and FHWA find that the TPB 2014 CLRP was developed based on a continuing, cooperative, and comprehensive transportation planning process carried on cooperatively by the TPB, the Washington Metropolitan Area Transit Authority (WMATA), the states of Maryland and Virginia, and the District of Columbia in accordance with the requirements of 23 USC 134 and Section 5303 of the Federal Transit Act (49 USC).

Based on our transportation planning regulatory requirements, our day-to-day involvement, and extensive review of technical analysis reports, and in accordance with the provisions of Section 134(h)(2)(B), Title 23 USC, FTA and FHWA find the financial information needed to support our fiscal constraint determination is complete.

Any questions concerning this determination should be directed to Ms. Melissa Barlow, Community Planner of the FTA DC Metropolitan Office, at (202) 219-3565 or Ms. Sandra Jackson, Community Planner of the FHWA District of Columbia Division, at (202) 219-3521.

Sincerely,

Reginald B. Lovelace
Deputy Regional Administrator
Federal Transit Administration, Region III

Joseph C. Lawson
Division Administrator
Federal Highway Administration

Enclosure

cc:
Kwame Arhin, FHWA Maryland Division
Ivan Rucker, FHWA Virginia Division
Edward Sundra, FHWA Virginia Division

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

SUBJECT: Technical Support Document for the Review of the 2008 8-Hour Ozone, Carbon Monoxide (CO), and 1997 Fine Particulate Matter ($PM_{2.5}$) National Ambient Air Quality Standards (NAAQS) Conformity Determinations of the 2014 Constrained Long Range Plan (CLRP) and the Fiscal Year (FY) 2015-2020 Transportation Improvement Program (TIP) for the Washington Metropolitan Region

FROM: Asrah Khadr, Environmental Engineer, EIT 12/9/14
Office of Air Program Planning (3AP30)

TO: Administrative Record of the Environmental Protection Agency (EPA) Review of the 2008 8-Hour Ozone, CO, and 1997 $PM_{2.5}$ NAAQS Conformity Determinations of the 2014 CLRP and the FY 2015-2020 TIP for the Washington Metropolitan Region

THRU: Cristina Fernandez, Associate Director 12/09/14
Office of Air Program Planning (3AP30)

I. Background

The purpose of this document is to review the 2008 8-Hour Ozone, CO, and 1997 $PM_{2.5}$ NAAQS Conformity Determinations of the 2014 CLRP and the FY 2015-2020 TIP as prepared by the Metropolitan Washington Council of Governments, National Capital Region Transportation Planning Board (TPB). The purpose is to determine whether or not the conformity determinations meet the requirements of the Clean Air Act (CAA) and the applicable regulations promulgated thereunder at 40 CFR part 93. On November 17, 2014, the U.S. Environmental Protection Agency (EPA), Region 3 received the Washington Metropolitan Region TIP and CLRP conformity determinations under a cover letter dated November 13, 2014, from the District of Columbia Division of the United States Federal Highway Administration (FHWA). The conformity determinations were reviewed in accordance with the procedures and criteria of the Transportation Conformity Rule contained in 40 CFR part 93, sections 93.102(b)(1), (b)(2)(iv), (b)(2)(v), and (b)(3), 93.106, 93.108, 93.110, 93.111, 93.112, 93.113(b), and (c), 93.118, and 93.119.

Transportation conformity is required under section 176(c) of the CAA to ensure that federally supported highway, transit projects, and other activities are consistent with (conform to) the

purpose of the State Implementation Plans (SIP). The CAA requires federal actions in nonattainment and maintenance areas to "conform to" the goals of SIP. This means that such actions will not cause or contribute to violations of a NAAQS; worsen the severity of an existing violation; or delay timely attainment of any NAAQS or any interim milestone. Actions involving FHWA or Federal Transit Administration (FTA) funding or approval are subject to the transportation conformity rule (40 CFR part 93, subpart A). Under this rule, metropolitan planning organizations (MPOs) in nonattainment and maintenance areas coordinate with State air quality and transportation agencies, EPA, FHWA, and FTA to demonstrate that their metropolitan transportation plans and TIPs conform to applicable SIPs. This is typically determined by showing that estimated emissions from existing and planned highway and transit systems are less than or equal to the motor vehicle emissions budgets (MVEBs) contained in a SIP.

EPA designated the Washington, DC-MD-VA Area as a marginal nonattainment area for the 2008 8-hour ozone NAAQS on May 21, 2012 (77 FR 30088) with an effective date of July 20, 2012. The Washington Area currently has MVEBs for the 1997 8-Hour Ozone NAAQS. On April 15, 2004, EPA designated the Washington, DC-MD-VA Area as a moderate 8-hour nonattainment area for the 1997 ozone NAAQS. Until new mobile budgets are developed, the Washington, DC-MD-VA Area must conform to currently approved MVEBs. For the 8-hour ozone conformity analysis for ozone, under section 93.109 of the Federal conformity rule, the existing 2009 Attainment Plan and 2010 Contingency Plan budgets for volatile organic compounds (VOCs) and nitrogen oxides (NO_x), which EPA declared adequate on February 7, 2013, are applicable to the ozone conformity determinations. The budgets are 66.5 tons/day of VOCs and 146.1 tons/day of NO_x for the 2009 Attainment Plan and 144.3 tons/day of NO_x for the 2010 Contingency Plan.

On December 17, 2004, EPA designated the Washington, DC-MD-VA Area as a nonattainment area for 1997 $PM_{2.5}$ annual standard On January 12, 2009 (74 FR 1146), EPA determined that the entire Washington Area had attained the 1997 annual $PM_{2.5}$ standard, based on ambient air quality monitoring data. The District Department of the Environment (DDOE), the Maryland Department of the Environment (MDE), and the Virginia Department of Environmental Quality (VADEQ) submitted a redesignation request and maintenance plan on the following dates: June 3, 2013 (DDOE & VADEQ), and July 10, 2013 (MDE). On October 6, 2014 (79 FR 60081), EPA approved the maintenance plan which was developed by DC, Maryland, and Virginia which included MVEBs for years 2017 and 2025 for NO_x and $PM_{2.5}$.

Currently, the Washington, DC-MD-VA Area is attaining the CO NAAQS and submitted a ten-year maintenance plan with MVEBs covering the period 1996-2007. EPA approved the maintenance plan and the associated MVEBs effective March 16, 1996 (January 30, 1996, 96 FR 1104). The Washington, DC-MD-VA Area submitted the required revised second ten year maintenance plan with MVEBs covering through March 2016. EPA approved the second 10-year maintenance plan and MVEBs on April 4, 2005 (70 FR 16958), requiring the Washington, DC-MD-VA Area to show that pollutants do not exceed the approved MVEBs of 1671.5 tons/day.

II. Review of the Submitted Modeling Utilizing the Motor Vehicle Emission Simulator (MOVES2010b)

Section 93.111 of the transportation conformity rule requires that conformity determinations must be based on the latest emission estimation model available. EPA announced the release of MOVES2010 in March 2010 (75 FR 9411) and subsequently released two minor model revisions: MOVES2010a in September 2010 and MOVES2010b in April 2012. Upon the release of MOVES2010, EPA established a two-year grace period before MOVES is required to be used for regional conformity analyses (75 FR 9411). More recently, EPA released a newer version of MOVES for use on October 7, 2014 (79 FR 60343). The notice of availability made MOVES2014 available for use in SIPs and transportation conformity. In this notice EPA approved a two year grace period before MOVES2014 has to be used for transportation conformity purposes. Subsequently, MOVES2010 was used for the emissions analyses for these conformity determinations.

To run the MOVES2010 model, a run specification (hereafter referred to as "RunSpec") must be created so the appropriate parameters are selected for the modeling run. The RunSpecs, inputs, and outputs were reviewed against the following EPA document: *Technical Guidance on the use of MOVES2010 for Emission Inventory Preparation in State Implementation Plans and Transportation Conformity.* This guidance document provides guidance on the use of the MOVES model to develop inventories for SIPs as well as analysis of emissions for transportation conformity determinations.

EPA carefully reviewed the inputs into the model to ensure that they are representative of each respective parameter for the area. Table 1 presents the input parameters and what was submitted for each parameter. The RunSpec parameters were reviewed as well; Table 2 presents the RunSpec parameters and the state's submittal for each parameter. The RunSpecs, input files, and output files were reviewed and found to have followed the applicable EPA guidance provided in the *Technical Guidance on the use of MOVES2010 for Emission Inventory Preparation in State Implementation Plans and Transportation Conformity.*

Table 1. Review of Inputs for RunSpecs for years 2015, 2017, 2025, 2030, 2040 for the Ozone, $PM_{2.5}$, and CO NAAQS for the Washington DC-MD-VA Area

Parameter	State Submittal
Age Distribution	All source types were presented with respect to age (0-30 years), and the age fraction of each source type.
Average Speed Distribution	All source types were presented with respect to road type, hour of the day, average speed and average speed fraction.

Fuel (Includes inputs for fuel formulation and fuel supply)	• For fuel formulation, the fuel formulation ID, Reid Vapor Pressure (RVP), and sulfur levels were included along with other data. • For Fuel Supply, the fuel formulation ID as well as the month group ID were included along with other parameters.
Meteorology Data	Meteorology data was provided for each hour of the day for each month. The meteorology data provided included temperature and relative humidity averages for each hour of a day for each month.
Ramp Fraction	The fractions of ramp driving times were provided for restricted access roadways.
Road Type Distribution	The vehicle miles traveled (VMT) fraction for each road type is provided for each source type and road type.
Source Type Population	The amount of vehicles for each source type are provided.
Vehicle Type VMT (includes inputs for daily VMT fraction, hourly VMT fraction, and monthly VMT fraction)	• The daily VMT fractions were provided for respective days and source types. • The hourly VMT fractions were provided with respect to hour of the day and source type. • The monthly VMT was provided with respect to source type and month.
Inspection/Maintenance (I/M) Programs	The I/M programs were presented with respect to source types and compliance factors as well as other data.

Table 2. RunSpec Reviews for years 2015, 2017, 2025, 2035, and 2040 for the Ozone, $PM_{2.5}$, and CO NAAQS for the Washington DC-MD-VA Area

Domain/Scale	County scale was selected. This is acceptable for this air quality analysis.
Calculation Type	Inventory was selected which is acceptable for this analysis.
Time Aggregation Level	Hourly time aggregation was selected. Selection of hourly time aggregation level is acceptable for this analysis.
Calendar Year Of Evaluation	The appropriate calendar year was selected. MOVES2010b can model years 1990 and 1999-2050.
Month of Evaluation	All 12 months were selected for evaluation for $PM_{2.5}$; July was selected for Ozone; January was selected for CO.
Type of Day of Evaluation	Weekdays and weekends were selected for $PM_{2.5}$. Weekdays were selected for Ozone and CO.
Hours of Evaluation	Starting and ending hours create a whole day (from 0-24 hours).
Geographic Bounds	One of the following Washington DC-MD-VA Area counties or cities were selected for each RunSpec: Alexandria City, Arlington

	County, Charles County, District of Columbia, Fairfax County, Frederick County, Loudon County, Montgomery County, Prince George's County and Prince William County.
Vehicles/Equipment: On-Road Vehicle Equipment	Appropriate combinations of fuels and source use types were made.
Road Type	Selection included all necessary road types.
Pollutants and Processes	• The following pollutants were selected for $PM_{2.5}$: Nitrogen oxides (NO_x), sulfur dioxide (SO_2), and all forms of primary $PM_{2.5}$ were selected, which is acceptable for this analysis. • The following pollutants were selected for CO: CO, which is acceptable for this analysis. • The following pollutants were selected for Ozone: volatile organic compounds (VOCs), NO_x, total gaseous hydrocarbons, and non-methane hydrocarbons, which is acceptable for this analysis.
On-Road Retrofits	N/A
ROP	N/A
Output Database/Unit Selection	Mass units selected to be U.S. Ton; energy units selected to be Joules; distance units selected to be miles.
Output Emission Detail in Emission Rate Calculations	Emission detail was selected via user preference.
Advanced Performance Features	N/A

III. EPA's Evaluation

For MVEBs to be approvable, they must meet, at a minimum, EPA's adequacy criteria found at 40 CFR 93.118(e)(4). EPA's adequacy criteria are: (1) the submitted control strategy implementation plan was endorsed by the Governor or designee and was subject to a State public hearing; (2) consultation among Federal, State, and local agencies occurred; full implementation plan documentation was provided to EPA; and EPA's stated concerns, if any, were addressed before the control strategy implementation plan was submitted; (3) the MVEBs are clearly identified and precisely quantified; (4) the MVEBs, when considered together with all other emissions sources, are consistent with applicable requirements for maintenance; (5) the MVEBs are consistent with and clearly related to the emissions inventory and the control measures in the submitted control strategy implementation plan; and (6) revisions to previously submitted maintenance plans explain and document any changes to previously submitted budgets and control measures; impacts on

point and area source emissions; any changes to established safety margins; and reasons for the changes (including the basis for any changes related to emission factors or estimates of vehicle miles traveled).

For all areas where transportation conformity applies, Table 1 – Conformity Criteria, found in 40 CFR 93.109(b) lists the conformity criteria that apply for transportation plans, TIPs, and projects in 40 CFR 93.110 through 93.119. A transportation plan or TIP conformity determination must include a regional emissions analysis that meets the requirements of 40 CFR 93.122. This regional emissions analysis must use latest planning assumptions (40 CFR 93.110); use the latest emissions model (40 CFR 93.111); and pass the appropriate conformity test – the budget test and/or the interim emissions test(s) (40 CFR 93.118 and 93.119). In addition, other requirements must be met and documented in the transportation plan and TIP conformity determination including interagency consultation and public participation (40 CFR 93.112); and timely implementation of Transportation Control Measures (TCMs) in approved SIPs (40 CFR 93.113). Table 3 below demonstrates how the document prepared by the TPB satisfies the requirements for conformity determinations.

Table 3. EPA's Evaluation of The Conformity Determinations of the Plan and TIP Submitted By The District Of Columbia Division Office Of The Federal Highway Administration On Behalf of TPB to EPA on November 13, 2014

CRITERIA APPLICABLE TO PLAN AND/OR TIP			
SECTION OF 40 CFR PART 93	CRITERIA	Y/N	COMMENTS
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	N	NO_x is included in the PM emission analysis.

	strategy?		
93.102(b)(2)(v)	Has the EPA or State made a finding that VOCs, Sulfur Oxides (SOx) or Ammonia (NH_3) as precursors are a significant contributor to the mobile PM emissions or has an applicable implementation plan (or implementation plan submission) established 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 $PM_{2.5}$ 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) established an approved (or adequate) budget that includes re-entrained road dust as part of a $PM_{2.5}$ reasonable further progress,	N	Re-entrained road dust is not included in the emissions analysis.

	attainment or maintenance strategy?		
93.106(a)(1)	Are the horizon years correct?	Y	The years chosen for the 8-hour ozone, CO, and 1997 $PM_{2.5}$ conformity analyses (2015, 2017, 2020, 2030, and 2040) are appropriate horizon years based on 40 CFR 93.118 (Criteria and procedures: Motor vehicle emissions budget). 2015 is the attainment year for the 2008 8-hour ozone NAAQS.
93.106(a)(2)(i)	Does the plan quantify and document the demographic and employment factors influencing transportation demand?	Y	The conformity determination summarized: population, employment, and household data for the Metropolitan Washington, DC area which was utilized in this analysis. These forecasts were based upon the Round 8.3 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 Air Quality Conformity Analysis document includes regionally significant additions or modification projects. The project list includes transit, highway, and high occupancy vehicle (HOV)/high occupancy toll (HOT) projects.
93.108	Is the transportation plan fiscally constrained?	Y	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.
93.110	Is the conformity determination based upon the latest planning assumptions?	Y	

	(a) Is the conformity determination, with respect to all other applicable criteria in 40 CFR §§93.111 - 93.119, based upon the most recent planning assumptions in force at the time of the conformity determination? (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 and is the conformity based upon the latest assumptions about current and future background concentrations?		(a & b) The latest planning assumptions have been utilized. The latest planning assumptions include the new Round 8.3 forecasts, which includes forecasts for population and employment data. The latest travel time changes were used in the travel demand model.
	(c) Are any changes in the transit operating policies (including fares and service levels) and assumed transit ridership discussed in the determination?		(c) Charges made by each transit provider as well as updated charges were used for future analyses.
	(d) Does the conformity determination include reasonable assumptions about transit service and increases in transit fares and road and bridge tolls over time?		(d) Increases in transit fares are incorporated.
	(e) Does the conformity		(e) All of the TCMs listed in the 8-hour and 1-hour Ozone SIPs for the

	determination use the latest existing information regarding the effectiveness of Transportation Control Measures (TCMs) and other implementation plan measures which have already been implemented? (f) Are key assumptions specified and included in the draft documents and supporting materials used for the interagency and public consultation required by 40 CFR §93.105?		Metropolitan Washington, DC area were implemented. The latest information regarding TCMs and other implementation plan measures effectiveness has been used. (f) Key MOVES modeling assumptions are provided as well as the most recent planning assumptions.
93.111	Is the conformity determination based upon the latest emissions model?	Y	This conformity determination used MOVES2010, an acceptable EPA emissions model 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	Consultation procedures were followed in accordance with the TPB consultation procedures. These procedures are based on the procedures of the state conformity SIP. **Interagency Consultation** The TPB has consulted with all appropriate agencies. This includes the District of Columbia Department of the Environment, 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, DC area. **Public Consultation** The TPB has provided opportunities for public comment on the Conformity Determination. On March 13, 2014, the TPB released for public comment for 30 days, the draft air conformity analysis for the TIP and CLRP.
93.113(b) and 93.113(c)	Are TCM's being implemented in a timely manner.	Y	All the TCMs listed in the 1-hour and 8-hour Ozone SIPs for the Metropolitan Washington, DC area were implemented. The latest information regarding TCMs and other implementation plan measures effectiveness has been used.
93.118	For areas with SIP Budgets: Does the Transportation Plan and TIP meet the required emission reduction test?	Y	On April 4, 2005 (70 FR 16958), EPA approved the new CO maintenance plan for the Washington, DC metropolitan area. The mobile budgets contained therein are applicable to this conformity determination and are in tons/day (tpd). 2005 CO Budget: 1671.50 tpd — 2015 Analysis: 494 tpd 2005 CO Budget: 1671.50 tpd — 2017 Analysis: 411 tpd 2005 CO Budget: 1671.50 tpd — 2020 Analysis: 360 tpd 2005 CO Budget: 1671.50 tpd — 2030 Analysis: 360 tpd 2005 CO Budget: 1671.50 tpd — 2040 Analysis: 381 tpd On February 7, 2013, EPA declared adequate mobile emissions budgets contained in the 2009 Attainment Plan

			and 2010 Contingency Plan for Maryland, Virginia, and the District of Columbia. Therefore, those mobile budgets are the applicable budgets to be used in this conformity determination. All three of these attainment mobile budgets are identical and are in tons/day (tpd). 2009/2010 Budgets: 66.50 tpd (VOC), 144.30 tpd (NO_x) — 2015 Analysis: 58.5 tpd (VOC), 131.9 tpd (NO_x) 2009/2010 Budgets: 66.50 tpd (VOC), 144.30 tpd (NO_x) — 2017 Analysis: 49.8 tpd (VOC), 103.1 tpd (NO_x) 2009/2010 Budgets: 66.50 tpd (VOC), 144.30 tpd (NO_x) — 2020 Analysis: 39.8 tpd (VOC), 65.8 tpd (NO_x) 2009/2010 Budgets: 66.50 tpd (VOC), 144.30 tpd (NO_x) — 2030 Analysis: 37.2 tpd (VOC), 60.4 tpd (NO_x) 2009/2010 Budgets: 66.50 tpd (VOC), 144.30 tpd (NO_x) — 2040 Analysis: 39.9 tpd (VOC), 61.1 tpd (NO_x) On October 6, 2014 (79 FR 60081), EPA approved for use MVEBs for the 1997 $PM_{2.5}$ NAAQS for transportation conformity purposes. The mobile budgets contained therein are applicable to this conformity determination and are in tons/year (tpy). The MVEBs are for years 2015 and 2025. 2017 Budgets: 41,709 tpy (NO_x), 1,787 tpy ($PM_{2.5}$) — 2015 Analysis: 46,115 tpy (NO_x), 1,926 tpy ($PM_{2.5}$) 2017 Budgets: 41,709 tpy (NO_x), 1,787 tpy ($PM_{2.5}$) — 2017 Analysis: 36,095 tpy (NO_x), 1,696 tpy ($PM_{2.5}$) 2025 Budgets: 27,400 tpy (NO_x), 1,350 tpy ($PM_{2.5}$) — 2020 Analysis: 23,323 tpy (NO_x), 1,279 tpy ($PM_{2.5}$) 2025 Budgets: — 2030 Analysis:

			27,400 tpy (NO_x) 1,350 tpy ($PM_{2.5}$) 2025 Budgets: 27,400 tpy (NO_x) 1,350 tpy ($PM_{2.5}$)	21,560 tpy (NO_x) 1,255 tpy ($PM_{2.5}$) 2040 Analysis: 21,944 tpy (NO_x) 1,299 tpy ($PM_{2.5}$)
93.119	For areas without emission budgets: Does the Transportation Plan and TIP demonstrate contribution to emission reductions?	N/A	N/A	

IV. CONCLUSION

Pursuant to FHWA's November 13, 2014 request, EPA has reviewed the 2008 8-Hour Ozone, CO, and 1997 $PM_{2.5}$ NAAQS Conformity Determinations for the 2014 CLRP and the FY 2015-2020 TIP prepared by the Metropolitan Washington Council of Governments, National Capital Region TPB for the Washington DC-MD-VA Area. EPA has determined that the 2014 CLRP and the FY 2015-2020 TIP meet the requirements of the CAA and the applicable regulations promulgated at 40 CFR part 93.

MEMORANDUM

January 15, 2015

To: Transportation Planning Board

From: Kanti Srikanth
Director,
Department of Transportation Planning

Subject: Response to Comments Received on Response to comments to the Board from a coalition of organizations regarding carbon emissions

Background

During the public comment period of its December 16, 2014 meeting The Board received comments from a coalition of 10 organizations with regard to the resolution the Board was scheduled to adopt on the matter on the region's greenhouse gas (GHG) reduction goals and COG's proposed multi-sectoral working group on greenhouse gas reductions. A copy of the written comments distributed during the 12/16/2014 meeting is attached. This memorandum contains the response to these comments that staff was asked to develop.

Comments and Responses

The comments are grouped into two categories: A) comments pertaining to the TPB's proposed resolution on GHG reduction goals, and D) recommendations for the multi-sectoral working group.

A. TPB's Resolution on GHG reduction goals

Comment: Recommends that the Board set September 30, 2015 as the deadline for the multi-sector working to complete its studies and issue recommendations. The coalition also called on the Board to include in its resolution the adoption of mid-term and long-term carbon di-oxide (CO2) reduction targets for the transportation sector..

Response: after discussions and considering the action taken by MWAQC on the same matter the Board added the following to its resolution before adopting it.

"Requests that COG regularly provide updates to TPB on the work of the multi-sector, multi-disciplinary professional working group and submit its interim report to TPB by September 30, 2015."

B. Recommendations for the multi-sectoral working group

Comment: The coalition urges COG's multi-sector working group to model an ambitious smart growth agenda including the following:

1. A scenario that leads to overall reduction in VMT, not per capita VMT;
2. Model land use, transportation and TDM measures to achieve a non-SOV mode share of 80% in the region's core (D.C, Alexandria, Arlington), 50% in inner suburbs (Fairfax, Montgomery, Prince George counties, Cities of Falls Church and Fairfax) and 35% in outer suburbs (Prince William, , Loudoun, Fredrick counties and the Cities of Manassas and Manassas Park);
3. A scenario that shifts funding away from new highway projects to transit, walking and biking, and
4. Model increasing placement of 75% of households in Activity Centers.

The coalition also asks that the study calculate co-benefits form the strategies including: public health, traffic management, infrastructure operating and life cycle costs, economic development, air pollution, water quality, equity in transportation access and avoided cost of inaction.

Response: The suggestions have been shared with COG staff for their consideration as they develop the scope of work for the multi-sector working group. These suggestions will laos be shared with the sector specific sub-group of professional staffs anticipated to be engaged in identifying viable, implementable local, regional and state actions in each of the four sectors.