

REEVALUATION

**PROJECT-LEVEL PM_{2.5} CONFORMITY DETERMINATION
for**



**GOVERNOR HARRY W. NICE MEMORIAL BRIDGE
IMPROVEMENT PROJECT
US 301 FROM CHARLES COUNTY, MARYLAND
TO KING GEORGE COUNTY, VIRGINIA**

PREPARED BY:



Maryland
Transportation
Authority

NOVEMBER 2010



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INTRODUCTION

The Governor Harry W. Nice Memorial Bridge (Nice Bridge) Improvement Project study area limits extend a distance of approximately ten miles along US 301, from just north of the US 301/MD 234 intersection in Charles County, Maryland to just west of Route 206 in King George County, Virginia (see Figure 1).

An Environmental Assessment/Draft Section 4(f) Evaluation (EA) was prepared in July 2009, which evaluated six build alternates in addition to a No-Build Alternate. Public Hearings were conducted on September 17, 2009 at the Dr. Thomas L. Higdon Elementary School in Newburg, Maryland and on September 24, 2009 at the Potomac Elementary School in Dahlgren, Virginia. Following the public hearings, comments from the public, elected officials, environmental agencies, and affected property owners were considered along with applicable state and federal regulations to identify the Preferred Alternate, Modified Alternate 7. Subsequently, a Preferred Alternate and Conceptual Mitigation document was prepared and concurred upon by the Federal Highway Administration (FHWA), the U.S. Army Corps of Engineers (ACE), U.S. Environmental Protection Agency (EPA), and National Marine Fisheries Service (NMFS) in September 2010. In May 2009, an air quality analysis was conducted (*Nice Bridge Improvement Project Air Quality Technical Report*) in accordance with US EPA and FHWA guidelines, per the 1990 Clean Air Act Amendments (CAAA), for carbon monoxide (CO), fine particulate matter (PM_{2.5}) and Mobile Source Air Toxics (MSAT). A summary of findings was included in the EA.

Changes in Air Quality Analysis Regulations Relevant to the Project

On March 10, 2006, EPA issued amendments to the Transportation Conformity Rule to address localized impacts of particulate matter: *PM_{2.5} and PM₁₀ Hot-Spot Analyses in Project-level Transportation Conformity Determinations for the New PM_{2.5} and Existing PM₁₀ National Ambient Air Quality Standards* (71 FR 12468). These rule amendments require the assessment of localized air quality impacts of federally-funded or approved transportation projects in PM₁₀ and PM_{2.5} nonattainment and maintenance areas deemed to be *projects of air quality concern*. King George County, Virginia is not designated as a nonattainment area for PM_{2.5}. However, Charles County, Maryland is in the Washington, DC-MD-VA PM_{2.5} nonattainment area; therefore, a project-level PM_{2.5} Conformity Determination is required. The PM_{2.5} analysis is now being reevaluated to include current air quality information and guidance.^{1, 2, 3}

¹**73FR4420 Transportation Conformity Rule Amendments To Implement Provisions Contained in the 2005 Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU); Final Rule.** On January 24, 2008 EPA issued an action in which “EPA is amending the transportation conformity rule to finalize provisions that were proposed on May 2, 2007”. In this final rule “EPA is changing § 93.104(b)(3) to require that the MPO and DOT determine conformity of a transportation plan at least every four years, and § 93.104(c)(3) to require that the MPO and DOT determine conformity of a transportation improvement program (TIP) at least every four years. The pre-existing regulations required these determinations to be made at least every three years.”

²**Final PM Qualitative Guidance Clarification; June 12, 2009:** “On March 29, 2006, the Environmental Protection Agency (EPA) and the Federal Highway Administration (FHWA) issued joint guidance on how to perform qualitative hot-spot analyses in PM_{2.5} and PM₁₀ nonattainment and maintenance areas titled, “Transportation Conformity Guidance for Qualitative Hot-spot Analysis in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas” (March 2006 guidance). The guidance provides information for State and local agencies to meet the PM_{2.5} and PM₁₀ hot-spot analysis requirements established in the March 10, 2006, final transportation conformity rule (71 FR 12468)”

“Since issuing the March 2006 guidance, a lawsuit was filed challenging a project’s conformity determination, including the project’s PM_{2.5} hot-spot analysis that relied on method A (comparison to another location with similar characteristics). Method A is described in question 4.1 of the March 2006 guidance. As part of a settlement agreement on that lawsuit (Environmental Defense, et al. v. USDOT, et al., No. 08-1107 (4th Cir., dismissed Nov. 17, 2008)), FHWA agreed to issue a clarification on a specific schedule, in coordination with EPA, to the March 2006 guidance. This clarification does not supersede the March 2006 guidance or the March 10, 2006 final transportation conformity rule; it only further explains how to implement the existing guidance and the hot-spot analysis requirements in the final rule. The clarification also does not create any new requirements and does not serve as guidance for PM_{2.5} and PM₁₀ quantitative hot-spot analyses.”

³**75 FR 14260 Transportation Conformity Rule PM_{2.5} and PM₁₀ Amendments; Final Rule (March 24, 2010):** “In this action, EPA is amending the transportation conformity rule to finalize provisions that were proposed on May 15, 2009. These amendments primarily affect conformity’s

PROJECT DESCRIPTION

The proposed Nice Bridge Improvement Project plans to provide a crossing of the Potomac River that is compatible with the approach roadway, increase capacity to accommodate design year traffic, improve safety conditions, and accommodate two-way traffic flow on the bridge during wide-load crossings, incidents, poor weather conditions, and when performing bridge maintenance and rehabilitation work.

US 301 is classified as a Rural Principal Arterial in the Charles County, Maryland and King George County, Virginia comprehensive plans. Rural Principal Arterial roadways, which include components of the Interstate Highway System, are designed to provide a rural network of continuous routes for interstate and intercounty service at the highest levels of mobility and speed. At the approaches to the Nice Bridge, this section of US 301 consists of a four-lane divided roadway with two travel lanes in each direction and outside shoulders. The existing 1.7-mile long Nice Bridge has one travel lane in each direction with no median separation and a narrow offset on each side (approximately one foot). The posted speed on the bridge varies from 40 to 50 miles per hour (mph). There is a four-lane toll plaza in Maryland that provides one-way toll collection for southbound vehicles. The percentage of trucks crossing the bridge in 2006 was approximately 14 percent of the vehicle mix, with nearly 1,200 wide-load vehicle crossings annually requiring closure of one direction of traffic flow across the bridge. Due to the limited roadway width on the bridge, the bridge must be closed to two-way traffic flow during each wide-load crossing.

The Nice Bridge is an important transportation element and is part of the National Highway System (NHS) and Strategic Highway Network (STRAHNET). STRAHNET is a 61,000-mile system of interstate and other highways, which are used for the rapid mobilization and deployment of armed forces in the event of war or a peacekeeping emergency. NHS and STRAHNET guidelines require the cross section of approach roadways to be continued across bridges. These requirements are not met at the existing Nice Bridge. Provisions for bicyclists and pedestrians are limited to the shoulders on the approach roadways. Bicyclists and pedestrians are prohibited from using the existing bridge, and must arrange, in advance, for MDTA maintenance staff to transport them in a truck.

At this stage of the project FHWA and MDTA have selected Modified Alternate 7 as the Preferred Alternate. Modified Alternate 7 consists of the installation of a new four-lane bridge to the north of the existing bridge, with a single, barrier-separated, two-way bicycle/pedestrian path on the south side of the new bridge.

Level of Service

There are six Level of Service (LOS) designations, from A to F, with LOS "A" representing free-flow operating conditions and LOS "F" representing failing conditions. Analysis of the 2006 traffic counts found that on an average weekday, traffic on the Nice Bridge (northbound and southbound) operates at LOS "D" for most of the day and LOS "E" during the PM peak period (4 PM to 6 PM), with 4 PM as the peak hour with 1,585 total vehicles traveling on the bridge.

implementation in PM_{2.5} and PM₁₀ nonattainment and maintenance areas. EPA is updating the transportation conformity regulation in light of an October 17, 2006 final rule that strengthened the 24-hour PM_{2.5} national ambient air quality standard (NAAQS) and revoked the annual PM₁₀ NAAQS. In addition, EPA is clarifying the regulations concerning hot-spot analyses to address a December 2007 remand from the Court of Appeals for the District of Columbia Circuit. This portion of the final rule applies to PM_{2.5} and PM₁₀ nonattainment and maintenance areas as well as carbon monoxide nonattainment and maintenance areas."

Bridge traffic operates at LOS “E” for at least seven hours (11 AM to 6 PM, with 3 PM as the peak hour and 1,526 total vehicles traveling on the bridge) during an average summer weekend day. Currently, there are no significant queuing delays associated with weekday traffic flows; however, based on observations, normal weekend queues extend up to one-quarter mile, and on major holiday weekends, queues can extend to at least four miles in both directions. On a projected 2030 No-Build average summer weekend day, the Nice Bridge is expected to operate at LOS “F” from 11 AM to 6 PM, and for the projected 2030 No-Build average weekday the bridge would operate at LOS “F” from 4 PM to 6 PM.

GENERAL DISCUSSION

On March 10, 2006, EPA issued amendments to the Transportation Conformity Rule to address localized impacts of particulate matter: *PM_{2.5} and PM₁₀ Hot-Spot Analyses in Project-level Transportation Conformity Determinations for the New PM_{2.5} and Existing PM₁₀ National Ambient Air Quality Standards* (71 FR 12468). These rule amendments require the assessment of localized air quality impacts of federally-funded or approved transportation projects in PM₁₀ and PM_{2.5} nonattainment and maintenance areas deemed to be *projects of air quality concern*. King George County, Virginia is not designated as a nonattainment area for PM_{2.5}. However, Charles County, Maryland is in the Washington, DC-MD-VA PM_{2.5} nonattainment area. As discussed in the Transportation Conformity Guidance, “*The March 10, 2006 final rule requires a qualitative PM_{2.5} hot-spot analysis to be completed for project-level conformity determinations for projects of air quality concern completed on or after April 5, 2006, when PM_{2.5} conformity requirements apply and the final rule is effective*”. On March 29, 2006, the FHWA published Guidance on Qualitative Hot-Spot Analysis for PM_{2.5} and PM₁₀ in nonattainment areas. A PM_{2.5} conformity determination for the Nice Bridge Improvement Project was provided in May 2009. As previously referenced, on June 12, 2009 EPA issued a clarification to this guidance. Specifically, EPA clarified “*how to conduct a qualitative PM_{2.5} or PM₁₀ hot-spot analysis using method A (comparison to another location with similar characteristics)*”.⁴

On March 10, 2010, EPA signed *the Transportation Conformity Rule PM_{2.5} and PM₁₀ Amendments; Final Rule*. This rule was published in the Federal Register on March 24, 2010 (75 FR 14260) and became effective on April 23, 2010. This final rule updated the transportation conformity regulation in light of an October 17, 2006 final rule that strengthened the 24-hour PM_{2.5} national ambient air quality standard (NAAQS) and revoked the annual PM₁₀ NAAQS.⁵

Federal regulations provide the requirements for determining the frequency of air quality conformity determinations. Specifically, 40CFR93.104(d) requires a redetermination of conformity “*if one of the following occurs: a significant change in the project's design concept and scope; four⁶ years elapse since the most recent major step to advance the project; or initiation of a supplemental environmental document for air quality purposes. Major steps include NEPA process completion; start of final design; acquisition of a significant portion of the right-of-way; and, construction (including Federal approval of plans, specifications and estimates).*”

⁴ Final PM Qualitative Guidance Clarification; June 12, 2009

⁵ National Ambient Air Quality Standards for Particulate Matter; Final Rule (75 FR 14260)

⁶ Amended per Transportation Conformity Rule Amendments To Implement Provisions Contained in the 2005 Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU); Final Rule [73FR4420]

Included hereinafter is a reevaluation of the previous PM_{2.5} for the Nice Bridge Improvement Project.

PM_{2.5} ANALYSIS

The northern terminus of the project is located in Charles County, Maryland, which is in the Washington, DC-MD-VA PM_{2.5} nonattainment area within the Metropolitan Washington Air Quality Committee Region. The geographic scope of this Region includes the Metropolitan Washington Region: Montgomery, Prince George's, Frederick, Charles and Calvert Counties in Maryland; Fairfax County, Arlington County, City of Alexandria, City of Falls Church, City of Fairfax, Prince William County, Loudoun County, City of Manassas and City of Manassas Park in Virginia; and the District of Columbia. The southern terminus of the project is located in King George County, Virginia, which is not designated nonattainment for PM_{2.5} and is not part of the regional TIP and CLRP. Because the Virginia portion of the study area is not nonattainment, the following analyses will be based on Maryland criteria and requirements.

The US EPA designated the Washington, DC-MD-VA PM_{2.5} area as in nonattainment for the 1997 PM_{2.5} NAAQS on January 5, 2005. This designation became effective on April 5, 2005, 90 days after EPA's published action in the Federal Register. Transportation conformity for the 1997 PM_{2.5} standards applied on April 5, 2006, after the one-year grace period provided by the Clean Air Act. In October 2006 EPA issued a Final Rule revising the PM_{2.5} NAAQS; reducing the level of the 24-hour PM_{2.5} standard to 35 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) and retaining the level of the annual PM_{2.5} standard at $15\mu\text{g}/\text{m}^3$ ⁷. This Final Rule did not rescind the 1997 PM_{2.5} NAAQS. Effective December 14, 2009, the Washington, DC-MD-VA PM_{2.5} area was redesignated as attainment for the 2006 24-hour PM_{2.5} NAAQS.⁸ The area remains as nonattainment for the Annual PM_{2.5} NAAQS. Transportation conformity for PM_{2.5} standards remain the same as those set on April 5, 2006 for the 1997 NAAQS until April 23, 2011; the one-year grace period from the date that the *Transportation Conformity Rule PM_{2.5} and PM₁₀ Amendments; Final Rule* became effective. As discussed on FHWA's frequently asked questions for "PM_{2.5} Project-Level Conformity and Hot-Spot Analyses," if a project requires a FHWA approval or authorization, a project-level conformity determination is required prior to the first such action on or after April 5, 2006, even if the project has already completed the NEPA process, or for multi-phase projects, even if other phases of the project have already been constructed.

As discussed in the examples to the preamble to the March 10, 2006 *Final Rule for PM_{2.5} and PM₁₀ Hot-Spot Analyses in Project-Level Transportation Conformity Determinations* (71FR12491), for projects involving the expansion of an existing highway, 40 CFR 93.123(b)(1) has been interpreted as applying only to projects that would involve a significant increase in the number of diesel transit buses and diesel trucks on the existing facility. This has been further clarified in a final rule amendment which changed 40CFR93 as follows: "93.123(b)(1)(i) *New highway projects that have a significant number of diesel vehicles, and expanded highway projects that have a significant increase in the number of diesel vehicles;*"⁹

Section 176(c) of the Clean Air Act and the federal conformity rule require that transportation plans and programs conform to the intent of the State Improvement Plan (SIP) through a regional

⁷ National Ambient Air Quality Standards for Particulate Matter; Final Rule (75 FR 14260)

⁸ Air Quality Designations for the 2006 24-Hour Fine Particle (PM_{2.5}) National Ambient Air Quality Standards; Final Rule (74FR58688)

⁹ National Ambient Air Quality Standards for Particulate Matter; Final Rule (75 FR 14260)

emissions analysis in PM_{2.5} nonattainment areas. The Nice Bridge Improvement Project is included in the Maryland Department of Transportation (MDOT) Consolidated Transportation Program (CTP), 2010 National Capital Region Constrained Long Range Plan (CLRP) and 2011-2016 Metropolitan Transportation Improvement Plan (MTIP) for the Washington Metropolitan Area for Air Quality Conformity. The CLRP is a comprehensive plan of transportation projects and strategies that the National Capital Region Transportation Planning Board realistically anticipates can be implemented over the next 30 years. The MTIP is a six-year program that describes the time-frame for federal funds to be obligated to state and local projects. On February 9, 2011, the US Department of Transportation determined that the CLRP and the MTIP met the systems level PM_{2.5} conformity requirements of the CAA; therefore, the Nice Bridge Improvement Project has been included in a conforming plan and program in accordance with 40 CFR 93.115. The current conformity determination is consistent with EPA's Transportation Conformity Rule found in 40 CFR Part 93.

Based on review and analysis of the Nice Bridge Improvement Project's Preferred Alternate, it has been determined that the project meets the CAAA and 40 CFR 93.109 requirements. A project-level PM_{2.5} hot-spot analysis is not required since the project is proposed to **not be a project of air quality concern**, as defined under 40 CFR 93.123(b)(1). Since the project meets the CAAA and 40 CFR 93.109 requirements, the project would not be expected to cause or contribute to a new violation of the PM_{2.5} S/NAAQS, or increase the frequency or severity of a violation. This determination is based on the following elements of the proposed project:

- The Nice Bridge Improvement Project's traffic engineering data suggests there will not be a significant increase in the percentage of diesel vehicles utilizing the corridor. As shown in Table 1, the truck traffic associated with the 2030 "Build" condition versus the "No-Build" condition indicates an increase in overall truck volumes of 640 vehicles. This is not a significant increase in the number of diesel vehicles due to construction of the project.
- The peak traffic on US 301 at the Nice Bridge occurs on Saturdays in the summer months, indicating the route is primarily a regional commuter route providing recreation and tourist related access to and from Virginia shore destinations or beyond.
- For the purpose of this analysis, it is assumed there will be no change in future truck percentages from existing truck percentages. Current and future build and no-build traffic data are listed in the table below. Depicted truck percentages represent the amount of light, medium and heavy truck activity along a given roadway segment in accordance with FHWA's 13 vehicle classification guidelines. Existing percentages are derived from 48-hour portable classified count data. Without the addition of significant truck land use generators to the traffic influence area, truck percentages would remain relatively unchanged between the No-Build and Build conditions. Current truck origin-destination patterns will dictate future patterns, unless changes are made in policy or there is a significant influx in truck generators to the traffic influence area – neither of which has been assumed by the approved Regional Transportation model.
- The difference in number of "diesel" trucks between the "build" and "no-build" would be further diminished as diesel trucks represent only a portion of the overall trucks using this

facility that is shown in Table 1. Diesel trucks are the primary contributor of transportation-induced PM_{2.5} emissions.

- The implementation of the EPA’s “2007 Highway Rule” is projected to remove diesel engine emissions from the equivalent of 90 percent of the total truck fleet, or about 13 million trucks and buses, by the year 2030. EPA’s 2007 “Highway Rule” was finalized in January 2001. A variety of approaches have been considered in developing the qualitative assessment for this project relative to PM_{2.5} conformity. Considering the multitude of factors and trends that will affect the particulate emissions of diesel vehicles, the most critical element is the incorporation of the EPA’s “2007 Highway Rule”, finalized in January 2001.

Table 1. Build and No-Build Average Daily Traffic (ADT) and Average Daily Diesel Truck Volumes (ADDT)

	Existing (2004)	2030 No-Build	2030 Build	Estimated 2015 No-Build	Estimated 2015 Build	2015 No-Build vs. Build Increase
Average Daily Traffic (ADT)	20,800	42,600	52,700	30,025	34,300	4,275
Percent Trucks	15%					
Average Daily Diesel Truck Volumes (ADDT)	3,120	6,390	7,905	4,505	5,145	640

CONCLUSION

Based on review and analysis as discussed above, it is determined that the Nice Bridge Improvement Project will not lead to a significant increase in diesel vehicles and does not meet any other criteria in 40 CFR 93.123(b) for a project of air quality concern. In addition, the project meets the Clean Air Act (CAA) and 40 CFR 93.109 requirements for particulate matter without a project-level hot-spot analysis, since the project has **not been found to be a project of air quality of concern** as defined under 40 CFR 93.123(b)(1). Since the project meets the Clean Air Act and 40 CFR 93.109 requirements, the project will not cause or contribute to a new violation of the PM_{2.5} NAAQS, or increase the frequency or severity of a violation.

Construction-related emissions for the project were considered to be temporary since construction-related emissions will last less than five years at any one site, meeting the criterion of section 93.123 (c)(5). Therefore, construction emissions are not required to be included in the hotspot analysis. EPA has not approved a PM_{2.5} SIP for Maryland, nor has EPA or the state air agency made any significance findings related to reentrained road dust for the Washington DC-MD-VA PM_{2.5} nonattainment area. Therefore reentrained road dust is not considered in the analysis, per the Conformity Rule. In addition, as there is not an applicable PM_{2.5} SIP, there are no PM_{2.5} control measures and the project is in compliance with 40 CFR 93.117.

By email dated November 10, 2010, the above analysis was approved by MDTA, and was sent to FHWA. By email dated December 13, 2010, the analysis was approved by FHWA and forwarded to EPA, MDE and the Metropolitan Washington Council of Governments (MWCOG) for Interagency Consultation. On December 14, 2010, a minor comment was received from MDE, which was addressed on December 15, 2010. On January 24, 2011, approval was received from EPA. The respondents agree with the conclusion that the Nice Bridge Improvement Project **is not a project of air quality concern under 40 CFR 93.123(b)(1)**. This PM_{2.5} Conformity Determination will be placed on MDTA’s website for a 15-day public review and comment period. Refer to the attached emails concerning comments and approvals.

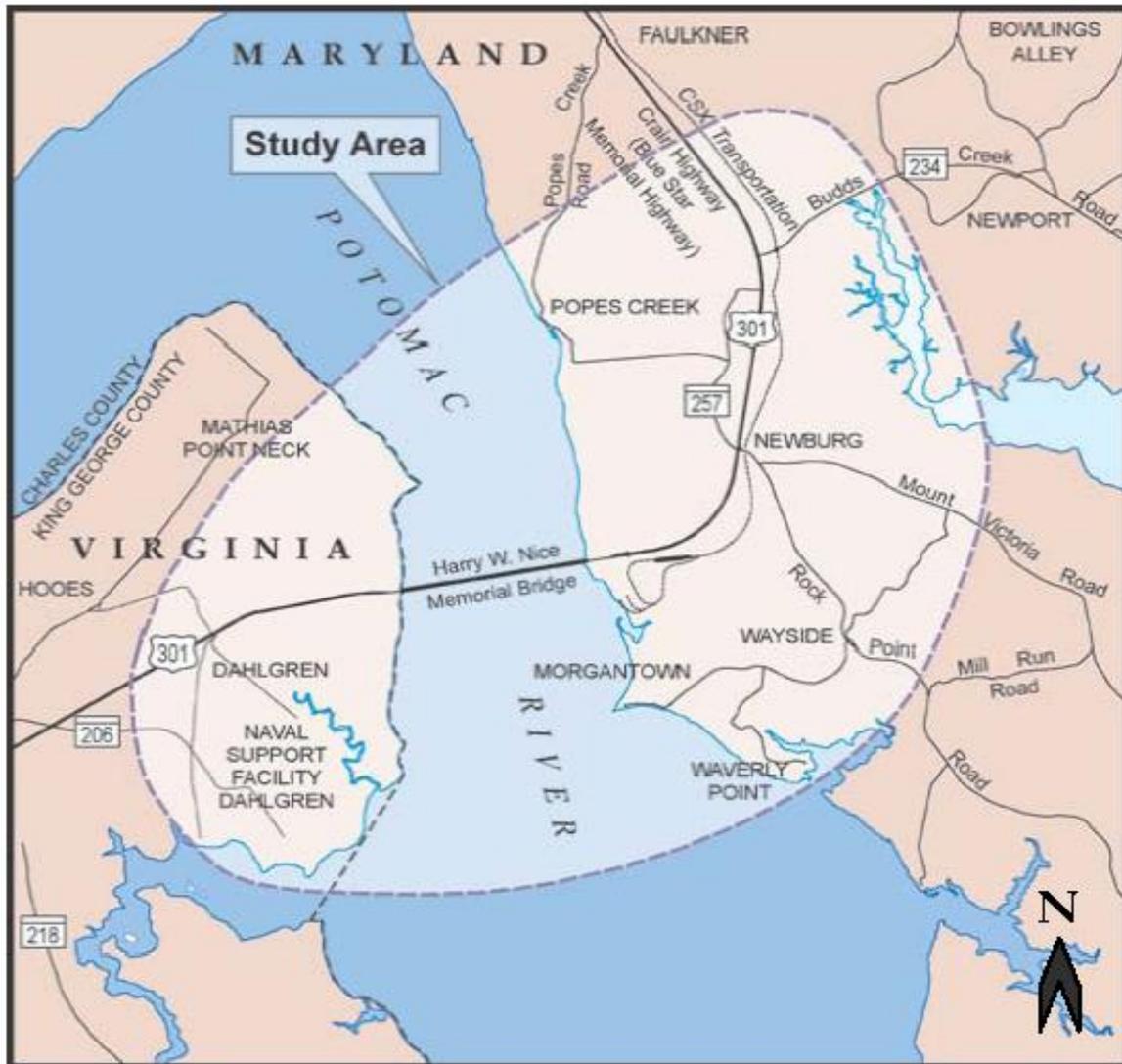


Figure 1. Nice Bridge Improvement Project Study Area Map



PM_{2.5} CONFORMITY DETERMINATION



From: Jennifer Rohrer [mailto:jrohrer1@mdta.state.md.us]
Sent: Wednesday, November 10, 2010 11:42 AM
To: jeanette.mar@dot.gov
Cc: Glen Smith; Matthew Teitt; ealmquist@rkk.com; eramsey@rkk.com; Shawn Burnett; Jen Rohrer; Jennifer Rohrer; sajid.aftab@dot.gov
Subject: Nice Bridge Improvement Project - PM_{2.5} Conformity Determination

Jeanette,

Attached is the PM_{2.5} Conformity Determination for the Nice Bridge Improvement Project. We request your comments on this document by Wednesday, November 24, 2010.

At your earliest convenience, please call me to discuss the next steps in the conformity determination process. It has been my experience that after FHWA approves the document, FHWA would send it out to the Interagency Consultation Group for a two-week review period. However, since the Nice Bridge project is included in recent updates to the CLRP (which is just now going through the Transportation Planning Board approval process, and then needs to be approved by FHWA, which is anticipated to occur in February 2011), I am unsure of the review process with the given timing of recent events.

(Please note, this conformity determination has been drafted to assume updates to the CLRP are approved by the TPB in November 2010 and FHWA in February 2011.)

Sincerely,
Jen
Jennifer Rohrer
Environmental Manager
Maryland Transportation Authority
Capital Planning Division
410-537-1061 (T)
410-363-0150 (M, W, Th, F)
jrohrer1@mdta.state.md.us

>>> <Jeanette.Mar@dot.gov> 12/13/2010 4:33 PM >>>

All:

Attached is the PM_{2.5} Conformity Determination for the Nice Memorial Bridge Improvement Project located in Charles County, Maryland and King George County, Virginia.

FHWA has determined that this project is not of air quality concern and is requesting concurrence from the Interagency Consultation Group. FHWA is presently reviewing the draft FONSI/Section 4(f) document. This project is in the project planning phase and is in the FY2011-2016 TIP for Metropolitan Washington Council of Governments under MDOT/Maryland Transportation Authority projects and in the 2010 CLRP. This conformity determination will be put on MDTA's website for a 15 day public review and comment period.

Please provide concurrence by the close of business on December 28, 2010. If you have any questions, please call me.

Thanks!
Jeanette



HAPPY HOLIDAYS!!!

Jeanette Mar
Environmental Program Manager
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From: Brian Hug [mailto:bhug@mde.state.md.us]
Sent: Tuesday, December 14, 2010 1:15 PM
To: Mar, Jeanette (FHWA); kotsch.martin@epamail.epa.gov; rudnick.barbara@epamail.epa.gov; mclifford@mwcog.org
Cc: Arhin, Kwame (FHWA)
Subject: Re: PM 2.5 Interagency Consultation for the Nice Bridge

I took a quick peak and I have a quick question....with such heavy congestion in this region it seems strange that there would be no projected increase in truck traffic after the improvement is complete....wouldn't the additions create some slight new demand?

From: Jennifer Rohrer
Sent: Wednesday, December 15, 2010 12:59 PM
To: Jeanette.Mar@dot.gov
Cc: Glen Smith; Matthew Teitt; mkelly@wtbco.com; sburnett@wtbco.com; ealmquist@rkk.com; eramsey@rkk.com; Jennifer Rohrer
Subject: RE: PM 2.5 Interagency Consultation for the Nice Bridge

Hi Jeanette,

With regard to Brian Hug's comment on the Nice Bridge PM_{2.5} Conformity Determination, we offer the following response:

On Page 5, the 3rd bullet of the PM_{2.5} Conformity Determination includes the statement, "Without the addition of significant truck land use generators to the traffic influence area, truck percentages would remain relatively unchanged between the No-Build and Build conditions. Current truck origin-destination patterns will dictate future patterns, unless changes are made in policy or there is a significant influx in truck generators to the traffic influence area – neither of which has been assumed by the approved Regional Transportation model." The 4th bullet on the same page continues, "The difference in number of "diesel" trucks between the "build" and "no-build" would be further diminished as diesel trucks represent only a portion of the overall trucks using this facility. Diesel trucks are the primary contributor of transportation-induced PM_{2.5} emissions."

The slight increase in truck volumes between the No-Build and Build conditions reflected in Table 1 of the PM_{2.5} Conformity Determination, is not considered a significant increase as the overall vehicle mix is projected to remain the same in 2030, with 15% of the ADT being trucks.

Sincerely,
Jen



PM_{2.5} CONFORMITY DETERMINATION



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From: Kotsch.Martin@epamail.epa.gov [Kotsch.Martin@epamail.epa.gov]
Sent: Monday, January 24, 2011 2:01 PM
To: Jeanette.Mar@dot.gov
Cc: bhug@mde.atate.md.us; mclifford@mwkog.org; Rudnick.Barbara@epamail.epa.gov; Jennifer Rohrer
Subject: Re: FW: PM 2.5 Interagency Consultation for the Nice Bridge

I have reviewed the proposed project analysis and based on the insignificant increase in diesel traffic with the implementation of the project. I agree with the conclusion that the project does not have a significant impact on air quality.



PM_{2.5} CONFORMITY DETERMINATION

