REEVALUATION

PROJECT-LEVEL $PM_{2.5}$ CONFORMITY DETERMINATION

for

SECTION 200: I-95
FROM NORTH of MD 43 TO NORTH of MD 22

BALTIMORE and HARFORD COUNTIES, MARYLAND

PREPARED BY:

Maryland Transportation Authority

JUNE 2010

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INTRODUCTION

The Section 200: I-95 project, from north of MD 43 to north of MD 22 (hereinafter referred to as Section 200), is one of four independent projects identified in the *I-95 Master Plan, I-895 Split (N) to the Delaware State Line* (also referred to as the I-95 Master Plan), which was adopted by the Maryland Transportation Authority (MDTA) in April 2003. The approximately 17-mile long Section 200 Study Area is located in Baltimore and Harford Counties, Maryland, and extends north along I-95 from north of the MD 43 interchange to north of the MD 22 interchange.

A Brief History of the Project

On November 30, 2007, Federal Highway Administration (FHWA) and the MDTA released the Environmental Assessment (EA) document for Section 200. On December 13, 2007, a public hearing was held to present the findings of the study documented in the EA and to receive public comment. On November 16, 2008, the MDTA selected the Express Toll Lanes Alternative as its Preferred Alternative. As part of these studies, an air quality analysis of the I-95 Section 200 Project, including CO, $PM_{2.5}$ and MSAT, was completed in July 2007, and a summary of findings was included in the Environmental Assessment.

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 PM_{10} Hot-Spot Analyses in Project-level Transportation Conformity Determinations for the New $PM_{2.5}$ and Existing PM_{10} 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 PM_{10} and $PM_{2.5}$ nonattainment and maintenance areas deemed to be *projects of air quality concern.* The Section 200 Study Area is in the Baltimore Region (including Baltimore and Harford counties) $PM_{2.5}$ nonattainment area. The $PM_{2.5}$ analysis is now being reevaluated to include current air quality information and guidance.[1, 2, 3]

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[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 PM_{10} nonattainment and maintenance areas titled, "Transportation Conformity Guidance for Qualitative Hot-spot Analysis in $PM_{2.5}$ and PM_{10} Nonattainment and Maintenance Areas" (March 2006 guidance). The guidance provides information for State and local agencies to meet the $PM_{2.5}$ and PM_{10} 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 PM_{10} quantitative hot-spot analyses."

[3] **75 FR 14260** Transportation Conformity Rule $PM_{2.5}$ and PM_{10} 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 implementation in PM2.5 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 PM2.5 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 PM2.5 and PM10 nonattainment and maintenance areas as well as carbon monoxide nonattainment and maintenance areas."*

PROJECT DESCRIPTION

The study area extends along I-95, from north of MD 43 to north of MD 22, in Baltimore and Harford Counties, Maryland for a length of approximately 17 miles as shown on **Figures 1** and **2**. The Section 200 Study Area includes four grade-separated interchanges located at MD 152, MD 24, MD 543, and MD 22. Additionally, the Maryland House Travel Plaza is located in the median of I-95 between MD 543 and MD 22 (**Figure 2**). The proposed Section 200 project plans to address capacity and safety needs and thereby improve access, mobility, and safety for local, regional, and inter-regional traffic, including passenger, freight, and transit vehicles. The existing typical section along Section 200 contains four-lanes in each direction up to the MD 24 interchange. The I-95 mainline loses one travel lane at the MD 24 interchange and continues as three GPLs from MD 24 through the remainder of the study area which terminates north of MD 22 at Maxa Road. Section 200 is the second independent project identified in the I-95 Master Plan which was developed by the MDTA, in cooperation with the FHWA and the Maryland Department of Transportation (MDOT).

At this stage of the project FHWA and MDTA have selected the Express Toll Lanes Alternative as the Preferred Alternative. The ETL Alternative involves extending four general purpose lanes (GPLs) and two express toll lanes (ETLs) in each direction along I-95 Section 200, just north of the MD 43 Interchange to the MD 24 Interchange. From MD 24 to MD 543, three GPLs would be retained and two ETLs would be added in each direction. The ETLs would terminate at MD 543 providing four GPLs to the project limits north of MD 22. The Preferred Alternative includes the following preferred options at the MD 152, MD 24, MD 543, and MD 22 interchanges:

I-95/MD 152 Option 1A

This option would consist of a diamond interchange. The interchange includes median ETL ramp access to MD 152. Two full traffic signals would serve I-95 GPL ramp traffic and one full traffic signal would serve I-95 ETL ramp traffic. This option incorporates cul-de-sacs to eliminate direct access from Old Mountain Road into the interchange ramp area. The Old Mountain Road Bridge over I-95 would be removed and would not be replaced.

For this option the I-95 northbound approach would consist of four GPLs and two ETLs through the interchange. A one-lane diagonal GPL ramp would lead to MD 152 northbound and southbound. Access to the I-95 GPL northbound lanes from MD 152 would be provided via a one lane diagonal ramp. A one-lane, left-side median ETL ramp would connect I-95 northbound ETLs to MD 152 northbound and southbound. A one-lane, left-side median ETL ramp would lead to the I-95 northbound ETLs.

The I-95 southbound approach would consist of four GPLs and two ETLs through the interchange. A one-lane diagonal GPL ramp would lead to MD 152 northbound and southbound. Access to the I-95 GPL southbound lanes from MD 152 would be provided via a two lane diagonal ramp. One-lane, left-side median ETL ramps would connect I-95 southbound ETLs to MD 152 northbound and southbound. A one-lane, left-side median ETL ramp would lead to the I-95 southbound ETLs.

Two through lanes in each direction would generally be provided on MD 152, with additional turn lanes at the interchange ramps.

I-95/MD 24 Option 2

This preferred option would be a combination partial cloverleaf/directional configuration, with a single loop in the southwest quadrant, and a flyover ramp. One half traffic signal along MD 24

northbound would provide access to the I-95 northbound GPL lanes. One full traffic signal along MD 24 would provide access for the I-95 northbound and southbound ETL median access ramps. One half traffic signal along MD 24 southbound would provide access for the I-95 southbound GPL on- and off-ramps.

The I-95 northbound GPL approach would consist of four lanes. A two-lane flyover ramp would lead to MD 24/MD 924/Tollgate Road. This ramp would split before reaching MD 24, with one lane to MD 24 southbound, and two lanes crossing I-95 leading to MD 24 northbound and MD 924/Tollgate Road. After crossing over I-95, the ramp would then split again, with one lane leading to MD 24 northbound and one lane leading to MD 924/Tollgate Road. Three I-95 northbound GPLs would continue north to MD 543. The I-95 northbound ETL approach would consist of two lanes. A one-lane, left-side median ETL ramp would lead to MD 24 and a one-lane, left-side median ETL ramp would lead to the two I-95 northbound ETLs. The two I-95 northbound ETLs would continue north to MD 543.

The I-95 southbound GPL approach would consist of three lanes. The I-95 southbound approach would add a one-lane distributor roadway. A one-lane outer connection ramp would lead from I-95 southbound to MD 924/Tollgate Road. The one-lane far side loop ramp would then lead from southbound I-95 to MD 24. An outer connection ramp from MD 24/MD 924/Tollgate Road to I-95 southbound would add a lane to I-95 southbound and four GPLs would continue south to MD 152. The I-95 southbound ETL approach would consist of two lanes. A one-lane, left-side median ETL ramp would lead to MD 24 and a one-lane, left-side median ETL ramp would lead to the two I-95 southbound ETLs. The two I-95 southbound ETLs would continue south to MD 152.

Three through lanes in each direction would generally be provided on MD 24, with additional turn lanes at the interchange ramps. A braided ramp system would be constructed along MD 24 northbound and southbound between I-95 and the MD 924/Tollgate Road interchange.

The proposed improvements associated with this interchange option would tie-in and are consistent with the improvements currently under construction at the MD 24/MD 924 Intersection (independent project).

I-95/MD 543 Option 7

This preferred option would include a diamond interchange with the addition of a single loop ramp from northbound MD 543 to southbound I-95. Two full traffic signals on either side of the interchange would provide access for I-95 GPL ramps. One full traffic signal along MD 543 would serve I-95 ETL median access ramps.

The I-95 northbound GPL approach would consist of three lanes. A two-lane diagonal ramp would lead to MD 543. A one-lane diagonal ramp from MD 543 would merge onto I-95 northbound. The I-95 northbound ETL approach would consist of two lanes. The left-hand ETL would drop at the one-lane median access ramp to MD 543. One I-95 northbound ETL would join three GPLs to carry four GPLs north to MD 22.

The I-95 southbound GPL approach would consist of four lanes. The left GPL would drop into the I-95 southbound ETLs and three GPLs would continue south to MD 24. A one-lane outer connection ramp would lead to MD 543. The loop ramp in the northwest quadrant would serve traffic from MD 543 northbound to I-95 southbound. A one-lane diagonal ramp from MD 543 southbound would merge on to I-95 southbound. A one-lane, left-side median ETL ramp would lead to the I-95 southbound ETLs. Two I-95 southbound ETLs would continue south to MD 24.

Two through lanes in each direction would generally be provided on MD 543, with additional turn lanes at the interchange ramps.

I-95/MD 22 Option 1

This preferred option would maintain the existing partial cloverleaf configuration with no modifications. The existing interchange contains loops in the northwest and southeast quadrants. One full traffic signal along MD 22 provides access for the I-95 northbound off-ramp. One full traffic signal along MD 22 provides access for the I-95 southbound off-ramp. I-95 through the interchange would consist of four GPLs in each direction.

The existing I-95 northbound approach adds a one-lane C-D roadway. A one-lane ramp then leads to MD 22. The existing I-95 southbound approach adds a one-lane C-D roadway. A one-lane ramp then leads to MD 22.

Two through lanes in each direction are generally provided on the existing MD 22, with additional turn lanes at the interchange ramps.

Level of Service

The Express Toll Lanes Alternative would provide superior service for motorists that use the ETLs (separated from the GPLs). The ETLs are anticipated to operate at a superior LOS compared to the LOS of the GPLs in both the Express Toll Lanes and General Purpose Lanes Alternatives. The volume for the ETLs would vary depending on the time of day with the greater ETL volumes occurring when more congestion is present in the GPLs.

Table 1: Project Weekday 2030 LOS Summary

Alternative	Roadway Section		AM Peak Hour		PM Peak Hour		Weekend Peak Hour	
			NB	SB	NB	SB	NB	SB
No-Build	New Forge Road to MD 152		D	F	F	D	F	F
	MD 152 to 24		C	F	F	D	F	F
	MD 24 to MD 543		D	F	F	E	F	F
	MD 543 to MD 22		C	C	D	D	F	F
General Purpose Lanes	New Forge Road to MD 152		B	D	D	C	D	C
	MD 152 to MD 24		B	C	D	C	C	C
	MD 24 to MD 543		B	C	C	C	D	D
	MD 543 to MD 22		B	C	C	C	E	D
Express Toll Lanes	New Forge Road to MD 152	ETL	A	C	C	A	B	B
		GPL	C	E	E	D	E	D
	MD 152 to MD 24	ETL	A	C	B	A	B	B
		GPL	C	D	D	D	D	D
	MD 24 to MD 543	ETL	A	A	B	A	B	B
		GPL	D	D	E	E	E	E
	MD 543 to MD 22	GPL	B	C	C	C	E	D

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 PM_{10} Hot-Spot Analyses in Project-level Transportation Conformity Determinations for the New $PM_{2.5}$ and Existing PM_{10} 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 PM_{10} and $PM_{2.5}$ nonattainment and maintenance areas deemed to be *projects of air quality concern.* The I-95 Section 200 Project is in the Baltimore, MD $PM_{2.5}$ 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 PM_{10} in nonattainment areas. A $PM_{2.5}$ conformity determination for the I-95 Section 200 Project was provided in July 2007. 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 PM_{10} 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 PM_{10} 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 PM_{10} 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; four[6] 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).*"

Included hereinafter is a reevaluation of the previous $PM_{2.5}$ for the I-95 Section 200 Project.

$PM_{2.5}$ Analysis

This project is located in Baltimore and Harford counties, which are both within the Baltimore, MD $PM_{2.5}$ area. The Baltimore, MD $PM_{2.5}$ area was designated as nonattainment for the 1997 $PM_{2.5}$ NAAQS on January 5, 2005 by the US EPA. 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 (μg/m3) and retaining the level of the annual $PM_{2.5}$ standard at 15μg/m3[7]. This Final Rule did not rescind the 1997 PM 2.5 NAAQS. Effective December 14, 2009, the Baltimore, MD $PM_{2.5}$ area was redesignated as attainment for the

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

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 PM2.5 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* PM_{10} *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]

The Baltimore Regional Transportation Board approved the 2010-2013 TIP and the Transportation Outlook 2035, as adopted on November 30, 2009, concluded that the region's transportation plan and program are in conformity with the SIP relative to air quality goals. The U.S. Department of Transportation has made a conformity determination on the Transportation Outlook 2035 and 2010-2013 TIP. I-95 Section 200 is listed as a Regionally Significant and Non-Federally Funded Transportation Improvement in the 2010-2013 TIP. Therefore, the I-95 Section 200 Project has been included in a conforming plan and program in accordance with 40 CFR 93.115. The current conformity determination is consistent with the final conformity rule found in 40 CFR Parts 51 and 93.

Based on review and analysis of the proposed I-95 Section 200 Alternatives, it has been determined that the project has not been found to be a project of air quality concern as defined under 40 CFR 93.123(b)(1). This determination is based on the following elements of the proposed project:

- The project's traffic engineering data suggests there will not be a significant increase in the percentage of diesel vehicles utilizing the corridor. The I-95: Section 200 project does not have a significant increase in the number of diesel vehicles due to construction of the project. 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 200 vehicles.

- Future truck percentages are assumed to be slightly less (0.56%) than the existing truck percentages for the purpose of this analysis. 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

[8] Air Quality Designations for the 2006 24-Hour Fine Particle (PM2.5) National Ambient Air Quality Standards; Final Rule (74FR58688)
[9] National Ambient Air Quality Standards for Particulate Matter; Final Rule (75 FR 14260)

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 2: 2030 Build and No-Build AADT and Truck Volumes

		2005	2030 Build	2030 No build	Change between Build and No Build
AADT	Min	89,000	131,000	129,000	2,000
	Max	165,000	231,000	229,000	2,000
Truck Percentage*		11.51%	10.95%	10.96%	0.01%
Truck Volume	Min	12,000	17,100	16,900	200
	Max	19,000	25,300	25,100	200

*Truck percentage is based on maximum AADT volumes

CONCLUSION

Based on review and analysis as discussed above, it is determined that the I-95: Section 200 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 Baltimore, MD $PM_{2.5}$ 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 May 14, 2010 the above analysis was approved by MDTA, and was sent to FHWA. By email dated May 26, 2010 the analysis was approved by FHWA and forwarded to EPA, MDE and BMC for Interagency Consultation. On June 9, 2010 approval was received from the Interagency Consultation Group (EPA, MDE and BMC) with some minor comments from BMC, which have been addressed. FHWA, EPA, BMC and MDE agreed with the conclusion that the I-95 Section 200 project **is not a project of air quality concern under 40 CFR 93.123(b)(1**). This Conformity Determination will be placed on MDTA's website for a 15-day pubic review and comment period. Refer to the attached emails concerning comments and approvals.

I-95 Section 200
Location/Regional Map
Baltimore and Harford Counties, Maryland

Figure 1

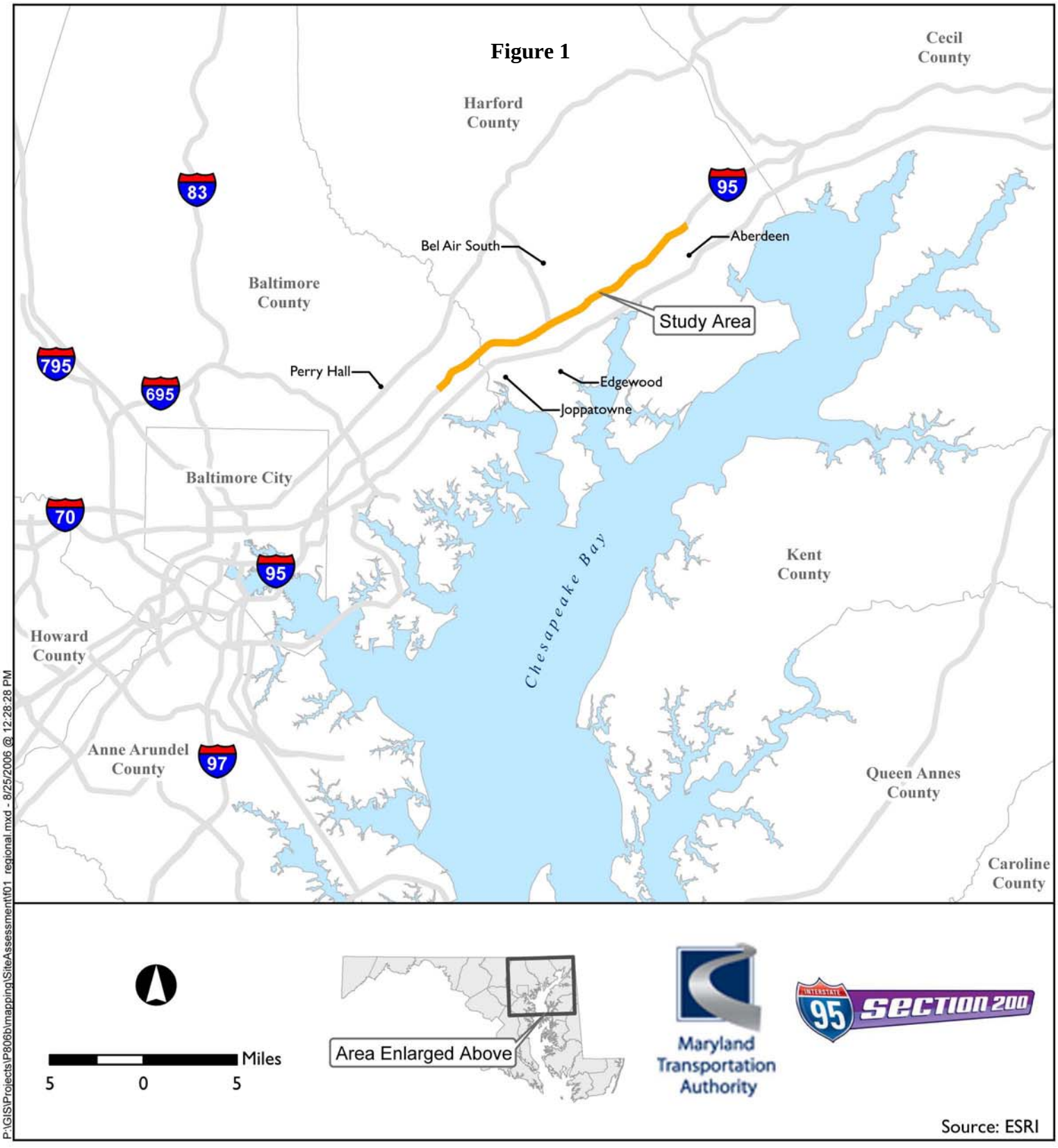
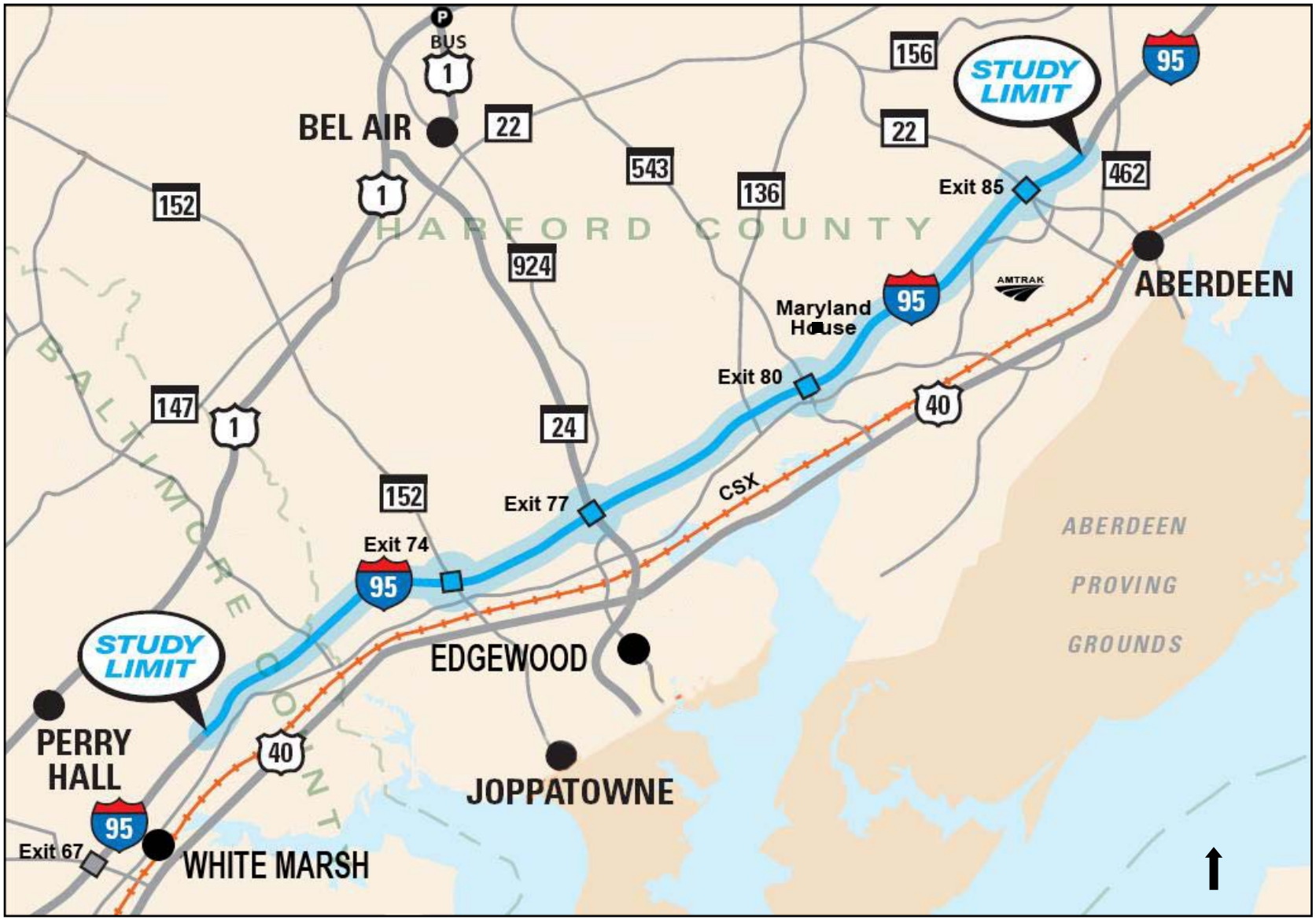


Figure 2
I-95 Section 200
Study Area Map



From: Jennifer Rohrer [mailto:jrohrer1@mdta.state.md.us]
Sent: Friday, May 14, 2010 5:06 PM
To: Aftab, Sajid (FHWA)
Cc: King, Denise (FHWA); Dennis Simpson; Melissa Williams; Russell Walto
Subject:

Good Afternoon, Sajid:

Attached to this e-mail is the I-95: Section 200 PM2.5 Conformity Determination for Interagency Consultation, and accompanying cover letter. We are requesting comments by June 11, 2010.

Should you have any questions, please feel free to contact me (see contact information below), or Ms. Melissa Williams, at 410-537-5651 or mwilliams9@mdta.state.md.us.

Sincerely,
Jen

Jennifer L. Rohrer
Environmental Manager
Maryland Transportation Authority
410-537-1061 (T)
410-363-0150 (M, W, Th, F)
jrohrer1@mdta.state.md.us
From: Denise.King@dot.gov [mailto:Denise.King@dot.gov]
Sent: Wednesday, May 26, 2010 10:45 AM
To: bhug@mde.state.md.us; kotsch.martin@epamail.epa.gov; Rudnick.Barbara@epamail.epa.gov; stomlinson@baltometro.org
Cc: Kwame.Arhin@dot.gov; Jeanette.Mar@dot.gov; Sajid.Aftab@dot.gov; jrohrer1@mdta.state.md.us; mkelly@wtbco.com
Subject: FW: I-95 Section 200 -- PM 2.5 Conformity Determination (reevaluation)

Good Morning,

Attached is the PM 2.5 Conformity Determination for the I-95 Section 200 Project in Baltimore and Harford County, MD. FHWA has determined that this project is not of air quality concern and is requesting concurrence from the Interagency Consultation Group.

MdTA has selected the Express Toll Lanes Alternative as its Preferred Alternative. We anticipate a FONSI late summer.

Please review and provide concurrence by close of business June 9, 2010.

Thanks,

Denise Winslow King
Environmental Specialist
FHWA - DelMar Division
10 South Howard Street, Suite 2450
Baltimore, MD 21201
(410) 779-7145

From: Kotsch.Martin@epamail.epa.gov [mailto:Kotsch.Martin@epamail.epa.gov]
Sent: Wed 6/9/2010 2:36 PM
To: Denise.King@dot.gov
Cc: Rudnick.Barbara@epamail.epa.gov; bhug@mde.state.md.us; Jeanette.Mar@dot.gov; Jennifer Rohrer; Kwame.Arhin@dot.gov; mkelly@wtbco.com; Sajid.Aftab@dot.gov; stomlinson@baltometro.org
Subject: Re: FW: I-95 Section 200 --- PM2.5 Conformity Determination (reevaluation)

Based on the relatively insignificant increase in the projected number of additional diesel trucks from the no-build to the build scenario, I concur in the determination that this is not a project of air quality concern.

From: Sara Tomlinson <stomlinson@baltometro.org>
Organization: Baltimore Metropolitan Council
Date: Wed, 9 Jun 2010 15:22:49 -0400
To: <Denise.King@dot.gov>, <bhug@mde.state.md.us>, <kotsch.martin@epamail.epa.gov>, <Rudnick.Barbara@epamail.epa.gov>
Cc: <Kwame.Arhin@dot.gov>, <Jeanette.Mar@dot.gov>, <Sajid.Aftab@dot.gov>, <jrohrer1@mdta.state.md.us>, <mkelly@wtbco.com>
Subject: RE: I-95 Section 200 --- PM 2.5 Conformity Determination (reevaluation)

Denise,

The ICG agrees that the project is not of air quality concern.

Included below are some *informal* BMC staff-level comments on the text.

1) On Page 5, the TIP referred to should be the FY 2010-2013 TIP, rather than 2008-2012, since it is more recent.
2) On Table 1, what year is the column heading "Current" referring to?
3) On Table 1, it is not indicated how the truck percentage is being calculated (based upon min, max, or average volumes).
4) In the project description section, you may want to refer to previous analyses on how travel time or LOS will change in the build condition.

Sara Tomlinson
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From: Brian Hug [mailto:bhug@mde.state.md.us]
Sent: Wed 6/9/2010 4:11 PM
To: stomlinson@baltometro.org; Denise.King@dot.gov; kotsch.martin@epamail.epa.gov; Rudnick.Barbara@epamail.epa.gov
Cc: Jeanette.Mar@dot.gov; Kwame.Arhin@dot.gov; Sajid.Aftab@dot.gov; Jennifer Rohrer; mkelly@wtbco.com
Subject: Re: RE: I-95 Section 200 --- PM 2.5 Conformity Determination (reevaluation)

As does mde

Brian J. Hug
Deputy Program Manager
Air Quality Planning Program
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230
410-537-4125
>>> "Sara Tomlinson" <stomlinson@baltometro.org> 06/09/10 15:24 PM >>>
Denise,

The ICG agrees that the project is not of air quality concern.

Included below are some informal, BMC staff-level comments on the text.

1) On Page 5, the TIP referred to should be the FY 2010-2013 TIP, rather than 2008-2012, since it is more recent.

2) On Table 1, what year is the column heading "Current" referring to?

3) On Table 1, it is not indicated how the truck percentage is being calculated (based upon min, max, or average volumes).

4) In the project description section, you may want to refer to previous analyses on how travel time or LOS will change in the build condition.

Sara Tomlinson
Environmental Planner
Baltimore Metropolitan Council
2700 Lighthouse Point East, Suite 310
Baltimore, MD 21224
P: 410-732-0500 x1035

From: Jennifer Rohrer [mailto:jrohrer1@mdta.state.md.us]
Sent: Friday, June 11, 2010 9:20 AM
To: King, Denise (FHWA)
Cc: Russell Walto; Melissa Williams; mkelly@wtbco.com; jrohrer@wtbco.com; Aftab, Sajid (FHWA); Mar, Jeanette (FHWA); sswam@jmt.com
Subject: (Revised) I-95 Section 200 PM 2.5 Conformity Determination (Reevaluation)

Denise,

Based on the informal BMC comments provided below, attached is the revised PM2.5 Conformity Determination (reevaluation) and Errata for Section 200.

We would like to get final approval on the document by the end of June so it can be posted on the project website for public comment by July 1 (ending July 16 for 15-day review).

Thank you,
Jen Rohrer

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

From: Denise.King@dot.gov [mailto:Denise.King@dot.gov]
Sent: Monday, June 14, 2010 3:42 PM
To: jrohrer1@mdta.state.md.us
Cc: RWalto2@mdta.state.md.us; mwilliams9@mdta.state.md.us; Michael Kelly; Jen Rohrer; Sajid.Aftab@dot.gov; Jeanette.Mar@dot.gov; sswam@jmt.com
Subject: RE: (Revised) I-95 Section 200 PM2.5 Conformity Determination (Reevaluation)

Hi Jen,

Check page 6 because the TIP info. still says 2008-2012 instead of the 2010-2013 which was approved on November 30, 2009. Fix that and post it for public comment.

Thanks

Denise