| Document Title | | | NCTCOG 2022 Transportation Conformity Documents (for 2017 and 2020 MVEBs) – ([Weblink](https://www.nctcog.org/trans/quality/air/federal-air-quality/conformity)) | | | Preparer | |  | Date |  |
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| Document Date | | | June 2022 | | | Organization | |  |  |  |
| Commenter | | | TxDOT Transportation Planning and Programming Division | | |  | |  |  |  |
| Item | Page | Section | | Sent. | Comment / Recommended Solution | Criteria | How Addressed  (or why not addressed) | | New Page | QC check |
| **Comments on Document** | | | | | | | | | | |
| 1 | - | Glossary of abbreviations | | SHI | Suggest adding SHEI and clarifying SHI:  SHEI – Source hours extended idling (for diesel combination long-haul trucks hoteling only)  SHI - total hours of idle, excluding diesel long-haul combination truck hotelling idle |  | Document revised. SHEI was added to the Glossary of abbreviations.  SHI expansion was updated. | |  |  |
| 2 | 2 | 1.3  and  Exhibit 1.3-1 | | 3rd,  And  Caption | Suggest adding the season and day-type for more clarity, such as “The NOX and VOC *ozone season (summer) weekday* vehicle emission results shown in Exhibit 1.3-1”. Also could include this detail in table caption or note. |  | Document revised. The season and day type are added to 1.3 and exhibit 1.3-1. | |  |  |
| 3 | 25, 26 | 3.4.4 Analysis Results | | Exhibits 3.4.4-2 and 3.4.4-3 | Suggest including the season and day-type detail for clarity, for example “2022 Transportation Conformity for the North Central Texas Nonattainment Area *Ozone Season (or Summer) Weekday* Emissions of Nitrogen Oxides” |  | Document revised. The season and day type was added to the description under 3.4.4, and the titles of exhibits 3.4.4-1 and 3.4.4-2. | |  |  |
| 4 | 31 | 5.3 Model Adjustments | | 2nd | Sentence states “… and time-of-day factors were developed to convert the network to August weekday.” Section 5.3.2 states that summer season ratios are calculated using ATR volumes for June, July, and August. Suggest clarifying use of August for T-O-D factors vs summer season. |  | August factors have been used for conformity purposes to be more conservative, with activity levels higher in August than in the other two summer months (June and July).  This is consistent with previous Conformity Analyses. | |  |  |
| 5 | 32 | 5.3.1 Model VMT Adjustments (HPMS vs TAFT) | | Last | Last sentence before Exhibit 5.3.1-1 states: “Exhibit 5.3.1-1 shows the calculation performed to develop the **new** HPMS adjustment factor, 0.9889, based on a comparison of 2014 VMT for HPMS and TAFT.”  Suggest clarifying how this factor is new, e.g., change in validation year TDM 2014 VMT, or HPMS (ASWT) VMT, or both? | - | The HPMS factor is new since the DFW Travel Demand Model (TDM) is new (Transportation Analytical Forecasting Tool, TAFT) and has a new validation year of 2014.  The updated HPMS results from TAFT (our previous model was DFX), the new Validation year, and the corresponding 2014 HPMS (ASWT) VMT. | |  |  |
| 6 | 32 | 5.3.2 | |  | Suggest adding a sentence at the end of the paragraph indicating the season and day type ratio used in this analysis, such as, “*The summer season weekday ratio was used in this analysis*”. | - | Document revised.  August factors have been used for conformity purposes to be more conservative, with activity levels higher in August than in the other two summer months (June and July).  A modified sentence saying the ‘August ratio was used’ was added. | |  |  |
| 7 | 34 | 5.4.1  And  5.5 | | Exhibits 5.4.1-1  And 5.5-1 | For clarity suggest adding the season and day-type “summer weekday” in the captions or in table notes for these VMT summaries. |  | Document revised. The season and day type was added to the table notes for the VMT summaries. | |  |  |
| 8 | 35 | 6.1 | | 1st | Sentence indicates TTI produced the vehicle population estimates. Suggest replacing “TTI” with “NCTCOG” in this sentence. | - | Document revised. The typo was corrected. | |  |  |
| 9 | 35 | 6.2 | | 2nd para. 1st sent. | Sentence states “TTI estimates ONI… “ Suggest replacing TTI with NCTCOG. | - | Document revised. The typo was corrected. | |  |  |
| 10 | 36 | 6.4 | | 1st, 2nd, 3rd | 1st sentence states “Engine starts were based on the MOVES national default starts per vehicle, and the local, county vehicle type population estimates.” – Two suggestions: 1) delete “national” since MOVES3 terminology no longer refers to MOVES defaults as “national”, 2) add clarification on the source of MOVES default starts per vehicle used. (For example, were they from “startspervehicle” table output of the MOVES county scale emission rate runs described in Section 7? If so, the local age distributions and fuel fractions inputs to MOVES affect the resulting startspervehicle output since in MOVES3 the vehicle starts vary by age. So starts per vehicle from MOVES would not be straight MOVES defaults.)  2nd and 3rd sentences state: “MOVES default weekday and weekend day starts per vehicle were used. Weekday results were used for Weekday and Friday scenarios and weekend day starts were used for Saturday and Sunday scenarios.” If weekend days are not relevant to this analysis, suggest removing references to them so as to avoid confusion. | - | Document revised. References to MOVES national default and weekend days were removed.  The starts were based on the MOVES starts per vehicle in the output database and the local county vehicle type population estimates. The paragraph language was revised. | |  |  |
| 11 | 36 | 6.5 | | Header  2nd | Suggest updating the section header by changing SHI to SHEI  2nd sentence refers to producing “…. The 2019 and 2023… activity estimates”. Suggest updating text with appropriate analysis years. |  | Document revised. SHI changed to SHEI in the title.  The analysis years typo was corrected. | |  |  |
| 12 | 37 | Chapter 7 | | Header | Since this chapter also covers calculation of the emissions estimates (Section 7.4), suggest updating the Chapter 7 header to reflect this, e.g., “CHAPTER 7: EMISSION FACTORS/MOVES MODEL/EMISSIONS MODELING” |  | No change. The chapter 7 title was from the 'Conformity Document Structure' per the statewide practice through the Technical Working Group (TWG).  Modifications to this title could be discussed at the TWG Conformity Documentation Subcommittee. The 'Conformity Document Structure' link is below:  <https://server.txaqportal.org/storage/uploads/2022/05/12/627d59feebfebConformity-Documentation-Structure.pdf> | |  |  |
| 13 | 45 | 7.3 Adjustments to Emission Factors | | Last | The last sentence states, “VMT mix is applied simultaneously with the emission calculation”. Suggest that since VMT mix is not an adjustment to emission factors, the sentence be deleted, or moved to an appropriate location (e.g., to the VMT mix section). |  | Document revised. The last sentence was deleted. | |  |  |
| 14 | 46 | 7.3.2 | |  | Section 7.3.2 Vehicle Miles of Travel Mix (or Fractions) is a subsection of 7.3 Adjustments to Emission Factors. Since VMT mix is not actually an adjustment to emission factors, to avoid confusion, suggest moving VMT mix section up one level to parity with Section 7.3. |  | Document revised. The Vehicle Miles of Travel Mix (or Fractions) was removed as a subsection of 7.3 and is now a separate section, 7.4. In addition, the previous 7.4 section, Modeled Emission Estimation, was updated to 7.5. | |  |  |
| 15 | 46 | 7.3.2 | | Last | This section about VMT mix states in the last sentence, “Appendix 12.16 includes MOVES3 emission factors for all counties in the nonattainment area.”. Suggest deleting this sentence since emission factors are not the subject of this section, or moving to a more appropriate location, and/or replacing with a sentence that refers the reader to an Appendix that includes the referenced VMT mixes (since it appears there is no such appendix, would need to add one in this case). |  | Document revised. The last sentence was modified to reference Appendix 12.21 External Files. The external files include the Pre-VMT Mix Files used in the post-processing. | |  |  |
| 16 | 46 | 7.4 | | 2nd para., last sent. | This sentence states: “Different procedures were applied for Dallas-Fort Worth Travel Demand Model counties outlined in the following sections.” Suggest for clarity adding an example for what this sentence means (e.g., what different procedures were applied for TDM counties, and depending on what?). |  | Document revised. The last sentence referred to the adjustments made to the TDM outputs, such as HPMS adjustments, Seasonal and Daily Adjustments, Hourly Adjustments, etc. Since these were described in detail in Chapter 5, the last sentence was deleted. | |  |  |
| 17 | 47 | 7.4 | | Exhibit 7.4-1 | Suggest updating the red box on bottom right by changing SHI to SHEI |  | Document revised. The text in the red box on the bottom right was changed (SHI to SHEI). | |  |  |
| 18 | 53 | 9.4 | | Last | Looks like a typo. The sentence indicates no credit was applied for 2023. Suggest “2023“ be deleted from the sentence. |  | Document revised. The typo was corrected. | |  |  |