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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 19, 2018

Achille Alonzi, Division Administrator
Federal Highway Administration, Texas Division
300 E. 8th Street, Rm 826
Austin, Texas 78701

Subject: Transportation conformity review and concurrence

Dear Mr. Alonzi:

Thank you for the opportunity to review the *2018 Transportation Conformity* report and associated documents submitted by the North Central Texas Council of Governments (NCTCOG) for *Mobility 2045: The Metropolitan Transportation Plan for North Central Texas* and the *2019-2022 Transportation Improvement Program for North Central Texas*. The purpose of this conformity analysis was to determine if the NCTCOG's 2045 metropolitan transportation plan (MTP) and the 2019-2022 transportation improvement program (TIP) are consistent with area emissions requirements for the ozone National Ambient Air Quality Standard (NAAQS). A 10-county area in the Dallas-Fort Worth (DFW) region is designated nonattainment for the 2008 eight-hour ozone NAAQS: Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, and Wise Counties. A nine-county area in the DFW region is designated nonattainment for the 2015 eight-hour ozone NAAQS: Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Tarrant, and Wise Counties. This conformity demonstration addressed both NAAQS.

To demonstrate conformity, projected nitrogen oxide (NO_x) and volatile organic compound (VOC) emissions from the area's MTP and TIP must be no greater than the applicable motor vehicle emissions budgets (MVEB) for NO_x and VOC, as required under Title 40 Code of Federal Regulations (CFR) Part 93, Subpart A. Regional transportation emissions were projected for analysis years 2018, 2020, 2028, 2037, and 2045 and then compared to the NO_x and VOC MVEBs established in the *Dallas-Fort Worth 2008 Eight-Hour Ozone Nonattainment Area Attainment Demonstration State Implementation Plan Revision for the 2017 Attainment Year*. The MVEBs in the applicable state implementation plan revision were found adequate for transportation conformity purposes by the United States Environmental Protection Agency (EPA) effective November 23, 2016. The NO_x MVEB is 130.77 tons per day (tpd), and the VOC MVEB is 64.91 tpd.

The NCTCOG demonstrated transportation conformity for both the 2008 and the 2015 eight-hour ozone NAAQS. For both NAAQS, NCTCOG projected emissions for the larger 10-county 2008 eight-hour ozone NAAQS nonattainment area for which the applicable MVEBs were set. This demonstration method is allowed under 40 CFR §93.109(c)(2)(ii)(B) when there are adequate or approved MVEBs for a previous ozone NAAQS nonattainment area and that area is larger than and, geographically, fully encompasses the nonattainment area for a new ozone NAAQS.

Mr. Alonzi
November 19, 2018

Texas Commission on Environmental Quality (TCEQ) staff reviewed the transportation conformity determination documents submitted by the NCTCOG. All issues with the conformity analysis were addressed and resolved in a series of meetings, consultative calls, and emails with the NCTCOG, the Federal Highway Administration, the EPA, the Texas Department of Transportation, and the TCEQ. The TCEQ is satisfied that all requirements have been met and transportation conformity has been demonstrated. If you have any questions about our review, please contact Ms. Jamie Zech of my staff at 512-239-3935 or jamie.zech@tceq.texas.gov.

Sincerely,



for Donna F. Huff, Director
Air Quality Division
Texas Commission on Environmental Quality

DFH/jz

Cc: Jose Campos, Federal Highway Administration
Guy Donaldson, U.S. Environmental Protection Agency
Carlos Swonke, Texas Department of Transportation
Peter Smith, P.E., Texas Department of Transportation
Michael Morris, P.E., North Central Texas Council of Governments