



**KYOVA**  
*INTERSTATE  
PLANNING  
COMMISSION*

July 23,

The Honorable James M. Jeffords, Chairman  
The Honorable Robert C. Smith, Ranking  
United States  
Committee on Environment and Public  
Works  
Dirksen Senate Office Building

Dear Senators Smith and

We appreciate your interest in the Clean Air Act conformity program, the impact that program has on transportation planning and the opportunity to provide information from the perspective of a small Metropolitan Planning Organization (MPO). Responses to issues listed in the attachment to your July 3, 2002 correspondence follow.

**Difference in Timing of**

Timing of required studies and reports for the state implementation (SIP), long range transportation plan (LRTP), improvement program (TIP) and the process for conformity analysis is, we agree, complicated at best. A graph accompanies this letter, which illustrates our MPO's recent history of general due dates for each transportation planning document and the effective duration of the document. The four year span of the TIP, for example, stops in two years when the update is due and a new document is developed. That is the most logical of the schedules, because it establishes reasonable time span for viewing the TIP and requires updates on a regular basis. An exception to the timing of the TIP is that a new one must be prepared each time that a LRTP is due. Very important, is the mismatch of the LRTP (20 year horizon) and SIP (10 year horizon), which results in ten years of the LRTP being discounted. There is

and cooperation of state and federal agencies, we have been able to meet required due dates. Because of the different frequencies, one considerable problem is that data and planning assumptions at the time of each update are different in the LRTP and TIP than those used in the SIP. The outcome of modeling projected emissions is affected.

Differences in timing posed delay for a major local FTA investment year, which threatened to increase project costs. The excellent cooperation and effort of the West Virginia Office of Air Quality, and

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federal agencies involved, resulted in timely resolution.

Kyova Interstate Planning Commission's experience last year in coordinating SIP and conformity processes with SIP submittals and updates resulted in a conformity lapse. The MPO began the air quality conformity process in February of 2001 that led to conformity analysis not meeting the SIP emission budget. With MOBILE6 on the horizon, the choices were to wait for its release (January 2002) or to request a SIP revision to avoid conformity lapse. The latter was chosen. The lapse occurred in September 2001. A model for interagency cooperation took place among the Environment Protection Agency (EPA), Federal Highway Administration (FHWA),

Federal Transit Administration (FTA), West Virginia Department of Transportation (WVDOT), the local transit authority (TTA) and the West Virginia Division of Air Quality (WVDAQ), which resulted in expediting the approval of a revision to the WV SIP.

### **MOBILE6 Versus MOBILE5 Projections**

The West Virginia SIP was developed using MOBILE5. Neither Kyova nor the state of West Virginia has practical experience with the use of MOBILE6, however it will be used to produce the WWSIP next year.

Kyova's conformity status is maintenance. To meet EPA requirements for use of latest planning assumptions, even though we use MOBILE5, it was necessary to use MOBILE6 default data for motor vehicle registration. That process generated excess emission data.

The new eight hour National Ambient Air Quality Standards is not expected to change the emissions budget.

### **Additional Vehicle Emission Controls**

The Kyova Interstate Planning Commission urban area is less than 200,000 in population and is, therefore, not a Transportation Management Area (TMA). West Virginia, which is the lead state for the MPO, federal vehicle emission control program.

### **Role of Transportation Control Measures**

TCMs are not required in the planning area. CMAQ projects in the plan are associated with model reduction credits. In planning, Kyova has taken into account a planned extensive bicycle path, an intermodal facility and traffic signal system optimization to reduce vehicle trips, travel time/delays and emissions.

### Impacts of Conformity Lapse

When the conformity lapse occurred in September 2001, consequences were immediate as expected. Our greatest concern at the time were projects that would suffer increased costs and delays that could threaten project development. As mentioned previously, an extraordinary spirit of cooperation among all concerned agencies averted that problem.

### Role of Motor Vehicle Emission Estimates and Models

For a small MPO, where presumed data is used, it is difficult to quantify results. The conformity analysis is expected to maintain attainment status for the area for all plan years.

The conformity process does help focus public attention on air quality concerns. MOBILE5a mobile source emission models are used to estimate VOC and NOX. Different methods and levels of analysis, as well official estimates of motor vehicle emissions have changed over the past 10-20 years making comparisons unrealistic.

### Role of Transportation Models

Conformity analysis has not been supported by adequate regional transportation analysis models that reflect how changes in highway capacity affect total travel and air pollution emissions.

The transportation model accounts for only two-thirds of the actual vehicle miles of travel (VMT) since the travel forecasting model is limited to the urbanized area. Remaining VMTs are projected.

We are grateful, that in the course of the reauthorization proceedings, the Committee has recognized this important air quality process and the opportunity to improve its outcome. Thank you for the opportunity to provide information for your deliberations.

Sincerely,



Michele P. Craig  
Executive Director

Accompanying Chart