



M E C K L E N B U R G - U N I O N
METROPOLITAN PLANNING ORGANIZATION

600 East Fourth Street
Charlotte, North Carolina 28202-2853
704-336-2205
www.mumpo.org

CHARLOTTE

CORNELIUS

DAVIDSON

HUNTERSVILLE

INDIAN TRAIL

MATTHEWS

*MECKLENBURG
COUNTY*

MINT HILL

MONROE

NCDOT

PINEVILLE

STALLINGS

*UNION
COUNTY*

WAXHAW

WEDDINGTON

WESLEY CHAPEL

WINGATE

TO: TCC Members
FROM: Robert W. Cook, AICP
MUMPO Secretary
DATE: March 9, 2010
SUBJECT: **Conformity Determination Report Comments**

Attached are comments received on the draft Conformity Determination Report.

Comments received from Eldewins Haynes, Air Quality Specialist, Charlotte Department of Transportation

Comments on the Conformity Analysis and Determination for the [Metrolina Region’s 2035 LRTPs and 2009-15 TIPs]

Where a change of text is suggested, the original wording is in [blue](#), and the new wording is in **red**

Page	Section	Table	Comment
Cover			The bold print title at the top must include “ Mecklenburg-Union MPO ” along with Cabarrus-Rowan MPO and Gaston Urban Area MPO
8	Conformity Determination		Change less than baseline emissions to pass specific ‘interim tests’
9	Emissions Budget		Change less than baseline emissions to pass specific ‘interim tests’
16		9	Change TEA-21 to SAFETEA-LU
16		9	Add to “p. 37-39” Appendix I
20, 22			The last bullet on p. 20 is continued on p. 22 as a separate bullet. They should be merged into a single bullet.
23		11	The blank extra columns should be removed
30	Emissions Model		Remove (as discussed in the North Carolina SIP)
31	Development of Emissions Factors...		Remove In order to assure that the emissions factors used in the conformity analysis were compatible with those used in the development of the North Carolina SIP,
31	Development of Emissions Factors...		Change NCDENR provides emissions factors and model inputs for each maintenance area in North Carolina to NCDENR provides emissions factors for the Metrolina nonattainment region.
33		13	Change TDM to MRM
33		13	Delete footnotes 2 and 4, they are no longer relevant
36		14	On the 2 nd row, change Ara to Area
39		21	add footnote ¹To obtain kilograms per day, multiply tons per day by 907.18

DAQ Comments on the Conformity Analysis and Determination Report for the Metrolina nonattainment Area dated February 8, 2010

February 25, 2010

Overall, I found the report and analyses to be comprehensive and demonstrates that the Plans and TIPs contained in the report conform to the intent and purpose of the SIP. I have addressed my only comments below...

Page 8, title, add a second closed parenthesis to the end.

Page 23, Table 11, consider reformatting the table to remove the extra cells to the right of CO.

Page 31, I/M fraction table is incorrect for 2007 and later. Values should be...

Gaston	0.91
Mecklenburg	0.90
Cabarrus	0.94
Iredell	0.86
Lincoln	0.97
Rowan	0.93
Union	0.89

The values used in the emission calculation worksheets are correct, so the actual analysis is not affected.

Page 32, last paragraph, as there is only one 2008 budget set. I believe this should read, "... the 2008 budget was used for ..."

Page 36, table 14, reformat so "Pollutant(s)" is on one line.

Eddie,

I only have a few comments on the draft report.

1) On page 30, 1st paragraph under - Method of Reporting VMT and Speed- the report states that North Carolina DAQ provides the emissions factors for Mobile6.2 then under Regional Emissions Budget Tests - it states DNER provided emission factors. I suggest you use DNER, for consistency, instead of DAQ because the public might think these are two different agencies providing the emission factors.

2) Page 33 Table 13 - I know we were planning for the worse case by including the interim test and budget test information. I suggest that you clean up the table to reflect the area is using the budget test for this conformity determination. Referencing the interim tests may cause confusion.

Under the Area Emissions Budget Status column, put RFP FR date or effective date of Adequacy.

Footnote #4 should be removed.

Dianna B. Smith
Environmental Scientist
Air Quality Modeling and Transportation
(404) 562-9207
e-mail smith.dianna@epa.gov