



August 11, 2008

Regional Air Quality Council
1445 Market St., #260
Denver, CO 80202

Re: Proposed State Implementation Plan Motor Vehicle Budgets

Dear Members of the Regional Air Quality Council:

Rocky Mountain Clean Air Action would like to express concerns over the proposed motor vehicle budget proposed for inclusion in the proposed State Implementation Plan ("SIP") revision to reduce ozone air pollution in the Front Range Region of Colorado. We would like to further urge the Regional Air Quality Council ("RAQC") to strengthen the proposed budgets to ensure a well-rounded motor vehicle emissions reduction strategy, to ensure protection of public health, to reduce ozone to at least 0.080 parts per million as directed by the Governor, and to help put the Front Range region on track to meet the new 8-hour ozone National Ambient Air Quality Standard ("NAAQS").

To begin with, we are concerned that the VOC budgets appear higher than prior 2010 projections. Under the proposed SIP, the total VOC conformity budget for the nonattainment area would be 112 tons/day, nearly 30 tons/day more than projected VOC emissions from mobile sources in 2010. Indeed, according to the modeling prepared by ENVIRON, projected VOC emissions from mobile sources in 2010 are projected to be 83.8 tons/day. We do not understand how projected mobile source VOC emissions increased 30 tons/day since ENVIRON completed its modeling. It appears that there is a need for additional explanation and or calculation with regards to the proposed VOC emissions budget.

Our overall concern with the proposed budgets however, is that they will encourage more congestion, more vehicle miles traveled, more vehicle hours traveled, among other impacts that promise only to challenge the region's compliance with the ozone NAAQS and endanger public health. The table on the following page is from DRCOG's 2035 Metro Vision Regional Transportation Plan and shows projections in roadway and transit performance measures. As can be seen, the impacts of future transportation planning in the Denver metro region (not including Larimer and most of Weld Counties) are staggering.

**Table 10
2035 Fiscally Constrained RTP Roadway
and Transit Performance Measures**

System Measures - Weekday DRCOG Region ⁽¹⁾	Existing 2005	2035 Fiscally Constrained	Change From 2005
Population	2,659,000	4,197,000	58%
Employment	1,561,000	2,517,000	61%
Person trips (excluding walk & bicycle)	11,444,000	18,141,000	59%
Vehicle trips	8,572,000	13,696,000	60%
Vehicle miles traveled (VMT)	65,710,000	113,097,000	72%
Vehicle hours traveled (VHT)	1,873,500	3,880,200	107%
Avg. vehicle speed - all day (mph)	35.1	29.1	-17%
Avg. vehicle speed - peak hours (mph)	29.1	19.5	-33%
Person miles traveled (excludes transit)	89,891,000	153,081,000	70%
Person hours traveled (excludes transit)	2,563,000	5,252,000	105%
Rail transit trips (boardings)	31,600	232,500	636%
Total transit trips (linked trips)	219,600	467,600	113%
Person miles traveled on transit	1,179,000	2,991,000	154%
Transit share of all daily trips	2.2%	2.9%	
Transit share of daily work trips	4.9%	6.5%	
Share of total population with good transit-job accessibility (2)	38%	43%	
Share of population in low-income or minority areas with good transit-job accessibility (2)	64%	83%	
Roadways with 3+ hours of severe congestion (lane-miles)	1,200	3,600	203.1%
Vehicle hours of delay	242,800	1,099,190	352.7%
Percent of VMT in severe congestion	14.9%	30.5%	

(1) - Reported for DRCOG model area, which is larger than Denver TMA and smaller than entire DRCOG region. Source - DRCOG Travel Models: C2_07_05Base, C2_07_2035RTP

(2) - Good accessibility = 100,000+ jobs within a 55-minute transit trip

Among other things, DRCOG projects that by 2035, there will be a:

- 60% increase in vehicle trips;
- 72% increase in vehicle miles traveled;
- 107% increase in vehicle hours traveled;
- 70% increase in person miles traveled;
- 105% increase in person hours traveled;
- 203.1% increase in roadways with 3 or more hours of severe congestion;
- 352.7% increase in vehicle hours of delay; and
- More than 100% increase in the percent of vehicle miles traveled in severe congestion.

Although person miles traveled on transit are projected to increase by 154%, by 2035 the total number of person miles traveled on transit will represent at best only 2% of the total person miles traveled in vehicles. Put simply, the proposed motor vehicle emissions budgets appear to be a recipe for gridlock throughout the Denver metro region.

Fortunately, there are alternatives. During the Metro Vision Regional Transportation Planning process, DRCOG analyzed six scenarios for the 2035 Metro Vision Regional Transportation Plan. The scenarios varied in terms of their transportation investment priorities and in terms of their urban footprint.¹ Three scenarios promised greater air quality benefits: one that emphasized compact, rather than expanded, urban development; a second that emphasized compact urban development and increased transit development, rather than highway development; and a third that emphasized compact urban development, increased transit, and pricing to influence travel demand. According to a rough analysis that we obtained from the Division, these three scenarios could reduce air emissions by as much as 100 tons/day, if not more.²

To keep motor vehicle emissions in check, this Council is already considering expanding the inspection and maintenance (“I/M”) program to the North Front Range, tightening I/M cutpoints throughout the nonattainment area, and requiring the use of lower volatility fuels. These proposals will take money and sacrifice from a variety of stakeholders, including refiners and motorists. It makes sense to round out this strategy to reduce motor vehicle emissions by strengthening the proposed motor vehicle budgets, rather than maintaining the status quo. Strengthening the motor vehicle budgets will ensure that metropolitan planning organizations (“MPOs”), including DRCOG and the North Front Range MPO, are equally involved and equally accountable to keeping motor vehicle emissions in check. Given that there are options to maintaining the status quo, including scenarios that provide for increased transportation and compact urban development in the region, there is a reasonable basis for the Council to ask for more.

¹ A presentation generally detailing these scenarios and their impacts is attached to this letter and can be found online at <http://www.drcog.org/documents/jillScenarioWorkshopPresentation.pdf>.

² Unfortunately, the Division has not been able to provide us with information detailing the specific reductions that could be expected by individual pollutant per scenario.

We would strongly recommend that the proposed motor vehicle budgets be strengthened by 20% or more. For the proposed VOC budgets, a 20% reduction would put the total nonattainment area budget at 90 tons/day and for the proposed NOx budgets, would put the total nonattainment area budget at 95 tons/day. Divided proportionally between the southern sub-region and the northern sub-region, this would result in the following budgets:

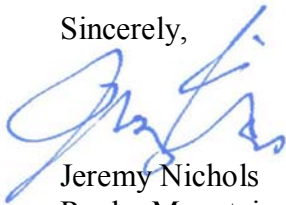
Emissions Budget Areas	2010	
	VOC	NOx
Southern Sub-regional Budget	72	76
Northern Sub-regional Budget	18	19

We recommend a 20% reduction based on the 2010 sensitivity tests prepared by ENVIRON. According to these tests, a 20% reduction in VOCs from mobile sources alone would achieve a 0.1 parts per billion reduction in ozone at Rocky Flats North and at Fort Collins West. And while a motor vehicle NOx reduction test was not performed by ENVIRON, the 2010 base case test shows that a 10% reduction in NOx, largely from motor vehicles, would achieve a 0.4 parts per billion reduction in ozone at Rocky Flats and a 1.1 parts per billion reduction in ozone at Fort Collins West. Given that the sensitivity tests found NOx reductions coupled with VOC reductions to be the most beneficial in reducing ozone throughout the region, we believe that a 20% VOC reduction coupled with a 20% NOx reduction could prove an effective ozone reduction strategy together with other proposed SIP provisions.

Above all, this is simply about developing an equitable motor vehicle emissions reduction strategy. A strategy that affects tailpipe emissions directly, that affects fuels, and that affects transportation planning is not only well rounded, but also an equitable proposal for reducing emissions. In light of the projected impacts of the Metro Vision Regional Transportation Plan, including increased congestion, vehicle trips, vehicle miles traveled, among other impacts, it makes sense to strengthen the proposed motor vehicle emission budgets rather than maintain the status quo.

Thank you for the opportunity to comment. We look forward to discussing this in greater detail at the next RAQC meeting.

Sincerely,



Jeremy Nichols
Rocky Mountain Clean Air Action