I-70 East

Meeting: **Air Quality Cooperating Agency**

Date/Time: **October 25, 2016; 9:00-11:00AM**

Location: **CDOT Region 1 (South Holly) - Metro Conference Room**

Participants:

Tim Russ, EPA	Rebecca Simpson, CDPHE	Bill Haas, FHWA
Carol Anderson, EPA	Gordon Pierce, CDPHE	Vanessa Henderson, CDOT
Chris Dresser, EPA	Emmett Malone, CDPHE	Paul Lee, CDPHE
Jeff Houk, FHWA	Dale Wells, CDPHE	Kirk Webb, Atkins
Chris Horn, FHWA	Mike Claggett, FHWA	Carrie Wallis, Atkins

MEETING NOTES

1. Introductions

Carrie provided an update on the project status. Phase 1 of the Preferred Alternative is now called the Central 70 project. The latest photo sim and map were provided. Project improvements were described and Carrie gave a description of operational and minor configuration changes. We will compare FEIS information in the ROD in the impacts section.

2. Project Update

Central 70: Phase 1 of the Preferred Alternative

- Carol: Who is responsible for maintenance of cover? Denver is responsible for the maintenance of the cover and an IGA is being developed to manage this process. The responsibility will be included in the ROD.

ROD includes updates and clarifications from the Final EIS

- Carol: Have you considered issuing a Supplemental FEIS? Yes, FHWA has reviewed the impacts as a result of the changes and consulted with legal counsel and is moving forward with a ROD because no new or different significant impacts have been determined.
- Dale Wells: Will the Sierra Club lawsuit affect the project? Not at this time. Tim Russ provided an update. EPA's response to the Petitioner's Brief is scheduled for 12/8/16. Jeff Houk believed that oral arguments will be in March.

3. DRCOG traffic data and MOVES modeling

Traffic data – using 2040 Focus model

- Carrie provided an update to 2040 DRCOG model for conformity analysis. We are updating the NEPA comparison and conformity analysis using the 2040 FOCUS model to respond to public comments received on the ROD. Working through bugs with new model with DRCOG. DRCOG recently re-ran the regional conformity analysis and the project is included. That has been approved by APCD.
- Mike Claggett and Atkins staff found mis-coded links in the model and are reporting

them to DRCOG. Project level conformity. Needed to re-run hot spot models to address the Sierra Club comments on the year of peak emissions and the use of current plan. Ramp metering affects ramp links, and Denver requested a new signalized intersection at 47th and York. Because of changes to the receptor network and ROW and highway links, the decision was made to start over and complete new models. The I-225 and I-25 interchanges are mostly complete, but they are still working on the Swansea area. In the FEIS, there were 2 hotspots and now there are 3 hotspots, with the new one (Swansea area) broken out of the I-25 hotspot.

- Coordinated with Dale Wells from CDPHE for new MOVES inputs for 2040 that were needed for the CO and PM10 analyses. MOVES runs are complete, and have used updated emissions for AERMOD.
    - Worst case traffic and worst case emissions for CO hotspot analysis were discussed. 2022 emission factors, traffic from 2040, similar to EPA approved method. Using MOVES2010b, as allowed by grace period.
- Road dust inputs were updated to use the correct formula and to account for the CDOT 75%/83% emissions reduction commitments, and were reviewed by Dale Wells at CDPHE.

4. Project Level Conformity

Modeling parameters for conformity analysis – PM_{10} and CO hotspot analyses locations

- Tim: Does the method for CO analysis conform to the EPA approval letter? Yes
- Chris Dresser: Are we losing any influence of the I-25 interchange by cutting it out of Swansea hotspot? Recommend reviewing as modeling is completed.
- A met data error from APCD was found. Years were duplicated, rather than complete across years. Received corrected data from Emmett at APCD. Used met data from Stapleton, which is older, but more representative of actual conditions.
- Dale (FHU) is using CAL3QHC for CO, and FHWA is running AERMOD for PM_{10}
- CDOT and FHWA are considering updating background data to 2013-2015, and using a new background data monitor. Commerce City site ceased in 2015. Welby still operating and will have more recent data, or La Casa on other side of I-25.
- CDOT and FHWA are also considering updating the exhaust, brake and tire wear correction factor with MOVES2010b, to be consistent with the remainder of the emissions analysis. Road dust correction is still based on exhaust brake and tire wear from old MOBLIE6. We could update to MOVES 2010b, which would produce an estimated 15% improvement.
- Moving road dust factor for EBT would need to run MOVES for 1990, using data used and inputs from original study.
- Tim asked how other monitors compare to Commerce City monitor. Welby is about a mile from Commerce City.
- Dale Wells: Welby is most likely similar to Commerce City, but PM levels are lower. Gordon: La Casa PM levels are also lower than Commerce City site. Whether it is true background? La Casa was not in service at the time that the Commerce City monitor was selected for the background location. Gordon indicated it may be a better background because the Commerce City monitor has a lot of industrial influences that aren't as influential in the project area. The La Casa monitor is closer to the project area and is likely more representative of the area's background. Currently using Commerce City as the background per the protocol and have revised the background

concentration of 113 μ/m^3 as per Tim's email of 6/20/16, which is very close to NAAQS but not over yet.

5. NEPA Comparison Analysis

The same methodology for the NEPA comparison updates will be used; however, the Swansea area will not be modeled for NEPA comparison purposes unless we get a surprise high value once the conformity run for that area is completed. We will include all alternatives with updated analysis using DRCOG 2040 data for the I-25 and I-225 interchanges. We will have separate reporting sections for conformity and NEPA. Emissions inventories will not be updated and will retain the DRCOG 2035 data.

6. Documentation in the ROD

We are preparing a separate conformity document that will become public for a review period. It will be attached to the Air Quality report for the ROD. We will put out both documents out for a 30-day public review. We're looking at early December and will go to agencies and the public at the same time.

7. Open Discussion/Other

Carol: How does the drainage controversy affect the project? Vanessa: The Denver project is out for construction. Denver commented that our pipe conflicts with theirs and CDOT is adjusting. Information will be included in the ROD on changes in impacts as necessary.

8. Next Steps

- 30-day review in early December
- Concurrence is needed from APCD. CDOT's concurrence request letter will be attached with the submittal.
- Also, a close out letter from EPA is requested. We will send a draft conformity report to EPA and also send modeling input, traffic, and met data, to EPA for review during the public review. Jeff committed to send an example letter/email regarding the South Mountain project from EPA Region 9.
- The signed ROD is scheduled for mid-January. There will be no extensions to the comment period.