



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

May 15, 2012

Texas Department of Transportation
Austin District
Jon Geiselbrecht
P.O. Drawer 15426
Austin, Texas 78761-5426

SUBJECT: MoPac Improvement Project Draft Environmental Assessment

Dear Mr. Geiselbrecht:

The Environmental Protection Agency (EPA) Region 6 has reviewed the Draft Environmental Assessment (DEA) prepared by the Texas Department of Transportation (TxDOT). In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the Region 6 office in Dallas, Texas is providing the following comments.

Section 4.14.1.3 Step 3: Notable Features, page 366

This section states "The Austin-Round Rock-San Marcos MSA (known as the Austin-Round Rock MSA prior to 2009) is currently in attainment with the National Ambient Air Quality Standards (NAAQS). The MSA has voluntarily entered into an Early Action Compact (EAC) with the Texas Commission on Environmental Quality (TCEQ) and the Environmental Protection Agency (EPA) to proactively address and implement emission reduction strategies to avoid nonattainment. The EAC resulted in the development and implementation of an emission reduction plan to assure attainment of the 8-hour ozone standard by 2007 and maintenance through 2015".

However, the EA does not appear to address what agreed upon control measures are in the EAC and how this project and air quality mitigation measures are consistent with the measures in the EAC. For example, the EAC includes control measures for "low emission construction activities" and "contract provisions for construction-related emissions on ozone action days." A more detailed discussion of project-related emission reduction strategies to avoid nonattainment is recommended.

EPA encourages the use of clean, lower-emissions equipment and technologies to reduce pollution. EPA's final Highway Diesel and Nonroad Diesel Rules mandate the use of lower-sulfur fuels in nonroad and marine diesel engines beginning in 2007.

Section 4.6 Air Quality

This section focuses on two main subsections, 4.6.1 Traffic Air Quality Assessment (TAQA) and subsection 4.6.2 Mobile Source Air Toxics. The TAQA subsection provides

information and analysis for carbon monoxide (CO) only. However, given the Austin-Round Rock-San Marcos area is near-nonattainment for ozone, an analysis of potential project-related impacts to ozone precursors (oxides of nitrogen [NO_x] and volatile organic compounds [VOCs]) is also needed. Alternative 6 (the recommended alternative) is an added-capacity project that, when built, will result in a 6 percent increase over the No-Build Alternative in total Vehicle Miles Traveled (VMT) in the near-term (2015). The final EA should provide a discussion of the anticipated impact on NO_x and VOC emissions due to additional VMT associated with this project.

Additionally, it is recommended that Section 4.6 Air Quality (pages 197-209) include information regarding the potential air quality impacts during the construction phase of the project and related mitigation measures (i.e., mitigation measures for PM/dust control, air quality impacts of construction vehicles etc.). The EA only briefly mentions air quality impacts related to construction activities. For example, page 381 states there are possible temporary emission increases related to construction activities. Please provide a subsection with a more detailed discussion of possible emission increases related to construction activities and mitigation measures. It is recommended that this be a subsection to Section 4.6 Air Quality.

Section 4.6.1 TAQA states that CO concentrations were modeled using CALINE3 and MOBILE6.2. The most current versions of those models are CALINE4 and the MOVES model. As acknowledged on page 207, indications from the development of the MOVES model are that MOBILE6.2 significantly underestimates diesel particulate matter (PM) emissions. The final EA should explain why the most recent models were not used in the air quality analysis for this project.

Section 4.6.2.1 Mobile Source Air Toxics (MSAT) Emissions Analysis on page 201 states that the analyses of MSATs within the study area were based upon approved Capital Area Metropolitan Planning Organization (CAMPO) models for each of the analyzed years. However, there is no mention of what those models are. The final EA should identify which models were utilized and provide more detailed information regarding model assumptions and results for each model referenced in this section.

We appreciate the opportunity to provide comments on the DEA. Please mail or email a copy or provide an internet link of the final EA when it is published. Thank you for your coordination and don't hesitate to contact John MacFarlane, of my staff, at 214-665-7491 or macfarlane.john@epa.gov should you have any questions or concerns regarding this letter.

Sincerely,



Rhonda Smith
Chief, Office of Planning and
Coordination