

CHAPTER VII

# Air Quality and Greenhouse Gas Assessment



Since most all of Massachusetts (with limited exceptions) was designated on 5/21/12 by the United States Environmental Protection Agency as “unclassifiable/attainment” for the latest ozone standard, a conformity determination for the CMMPO 2016-40 long-range transportation plan is not required. Further details and background information are provided below.

## Air Quality Conformity

### *Introduction*

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The 1990 Clean Air Act Amendments (CAAA) require metropolitan planning organizations within nonattainment and maintenance areas to perform air quality conformity determinations prior to the approval of Long-Range Transportation Plans (LRTPs) and Transportation Improvement Programs (TIPs), and at such other times as required by regulation. A nonattainment area is one that the U.S. Environmental Protection Agency (EPA) has designated as not meeting certain air quality standards. A maintenance area is a nonattainment area that now meets the standards and has been re-designated as maintaining the standard. A conformity determination is a demonstration that plans, programs, and projects are consistent with the State Implementation Plan (SIP) for attaining the air quality standards. The CAAA requirement to perform a conformity determination ensures that federal approval and funding go to transportation activities that are consistent with air quality goals.

The entire Commonwealth of Massachusetts was previously classified as nonattainment for ozone, and was divided into two nonattainment areas. The Eastern Massachusetts ozone nonattainment area included Barnstable, Bristol, Dukes, Essex, Middlesex, Nantucket, Norfolk, Plymouth, Suffolk, and Worcester counties. Berkshire, Franklin, Hampden, and Hampshire counties comprised the Western Massachusetts ozone nonattainment area. With these classifications, the 1990 Clean Air Act Amendments (CAAA) required the Commonwealth to reduce its emissions of volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>), the two major precursors to ozone formation to achieve attainment of the ozone standard.

As of April 22, 2002, the city of Worcester was re-designated as being in attainment for carbon monoxide (CO) with an EPA-approved limited maintenance plan. In areas with approved limited maintenance plans, federal actions requiring conformity determinations under the transportation conformity rule are considered to satisfy the "budget test" (as budgets are treated as not constraining in these areas for the length of the initial maintenance period). Any future required "project level" conformity determinations for projects located within this community will continue to use a "hot-spot" analysis to assure that any new transportation projects in this CO attainment area do not cause or contribute to carbon monoxide non-attainment.

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*Legislative and Regulatory Background*

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The 1970 Clean Air Act defined a one-hour national ambient air quality standard (NAAQS) for ground-level ozone. The 1990 CAAA further classified degrees of nonattainment of the one-hour standard based on the severity of the monitored levels of the pollutant. The entire commonwealth of Massachusetts was classified as being in serious nonattainment for the one-hour ozone standard, with a required attainment date of 1999. The attainment date was later extended, first to 2003 and a second time to 2007.

In 1997, the EPA proposed a new, eight-hour ozone standard that replaced the one-hour standard, effective June 15, 2005. Scientific information had shown that ozone could affect human health at lower levels, and over longer exposure times than one hour. The new standard was challenged in court, and after a lengthy legal battle, the courts upheld it. It was finalized in June 2004. The eight-hour standard is 0.08 parts per million, averaged over eight hours and not to be exceeded more than once per year. Nonattainment areas were again further classified based on the severity of the eight-hour values. Massachusetts as a whole was classified as being in moderate nonattainment for the eight-hour standard, and was separated into two nonattainment areas—Eastern Massachusetts and Western Massachusetts.

In March 2008, EPA published revisions to the eight-hour ozone NAAQS establishing a level of 0.075 ppm, (March 27, 2008; 73 FR 16483). In 2009, EPA announced it would reconsider this standard because it fell outside of the range recommended by the Clean Air Scientific Advisory Committee. However, EPA did not take final action on the reconsideration so the standard would remain at 0.075 ppm.

After reviewing data from Massachusetts monitoring stations, EPA sent a letter on December 16, 2011 proposing that only Dukes County would be designated as nonattainment for the new proposed 0.075 ozone standard. Massachusetts concurred with these findings.

On May 21, 2012, (77 FR 30088), the final rule was published in the Federal Register, defining the 2008 NAAQS at 0.075 ppm, the standard that was promulgated in March 2008. A second rule published on May 21, 2012 (77 FR 30160), revoked the 1997 ozone NAAQS to occur one year after the July 20, 2012 effective date of the 2008 NAAQS.

Also on May 21, 2012, the air quality designations areas for the 2008 NAAQS were published in the Federal Register. In this Federal Register, the only area in Massachusetts that was designated as nonattainment is Dukes County. All other Massachusetts counties were classified as unclassifiable/attainment.

All the Massachusetts MPOs and MassDOT continue to meet the requirements of air quality conformity according to the Code of Federal Regulations, and as evaluated through inter-agency consultation. Specifically:

On March 6, 2015, (80 FR 12264, effective April 6, 2015) EPA published the Final Rulemaking, “Implementation of the 2008 National Ambient Air Quality Standards (NAAQS) for Ozone: State Implementation Plan Requirements; Final Rule.” This rulemaking removed transportation conformity to the 1997 Ozone NAAQS (the standard referenced by CLF and the subject of a 12/23/14 DC Circuit Court decision).

Link to Final EPA Rulemaking: <http://www.gpo.gov/fdsys/pkg/FR-2015-03-06/pdf/2015-04012.pdf>

Since the RTPs have been developed, reviewed, and will be approved after April 6, 2015, air quality conformity determinations to the 1997 Ozone NAAQS are no longer required, as those standards and all associated area designations have been permanently replaced by the 2008 NAAQS, which (with actually a stricter level of allowable ozone concentration than the 1997 standards) no longer designate Massachusetts as a non-attainment area(s) for ozone (except for Dukes County – see below).

Through the Interagency air quality consultation process (involving U.S. DOT, EPA, MassDEP, MassDOT, and the MPOs) the latest EPA rulemakings, the referenced court decision, ozone standards and area designations were all reviewed. Specific transportation conformity requirements in Massachusetts for this RTP round are as follows:

- No conformity determination is required for the 2008 Ozone NAAQS, as Dukes County (the only designated non-attainment area) is classified as an “isolated rural nonattainment area” and therefore only needs to evaluate transportation conformity when the Martha Vineyard Commission has a “regionally significant” project that would trigger conformity.
- The Boston carbon monoxide attainment area with a current maintenance plan in place (with a carbon monoxide motor vehicle emission budget) will prepare a carbon monoxide air quality analysis for the Boston Area (nine communities).
- The Lowell, Waltham, Worcester and Springfield Areas are classified attainment with a limited maintenance plan in place. No regional air quality analysis is required in limited maintenance plan areas as emissions may be treated as essentially not constraining for the

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length of the maintenance period because it is unreasonable to expect that such areas will experience so much growth in that period that a violation of the carbon monoxide NAAQS would result. Therefore, in areas with approved limited maintenance plans, Federal actions requiring conformity determinations under the transportation conformity rule are considered to satisfy the “budget test.” All other transportation conformity requirements under 40 CFR 93.109(b) continue to apply in limited maintenance areas, including project level conformity determinations based on carbon monoxide hot spot analyses under 40 CFR 93.116.

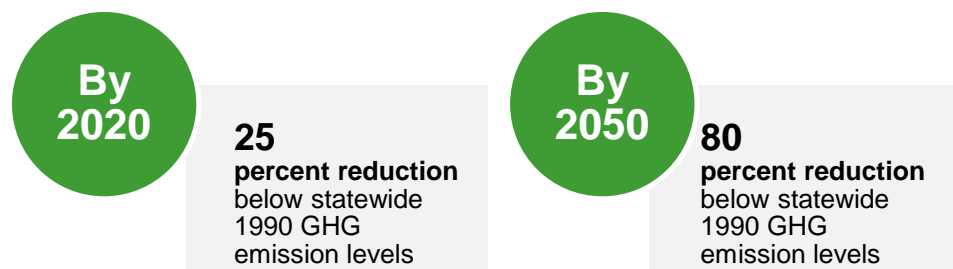
In consideration of the comments received, combined with MassDOT’s greenhouse gas (GHG) reporting requirements for the Commonwealth’s Global Warming Solutions Act (310 CMR 60.05), MassDOT will conduct a “conformity-related” emissions analysis for ozone precursors, consistent with the 1997 NAAQS standards (currently superseded by the 2008 NAAQS). This emissions analysis will be for informational purposes only (as it is currently NOT federally required), and will be contained in a separate air quality document (also to include GHG emissions analysis) that will be completed at the end of August 2015 – the results of which will then be available to the MPOs, the Massachusetts Executive Office of Energy and Environmental Affairs (and affiliate agencies), and all other interested parties.

## Green House Analysis

### *CMMPO and the Global Warming Solutions Act*

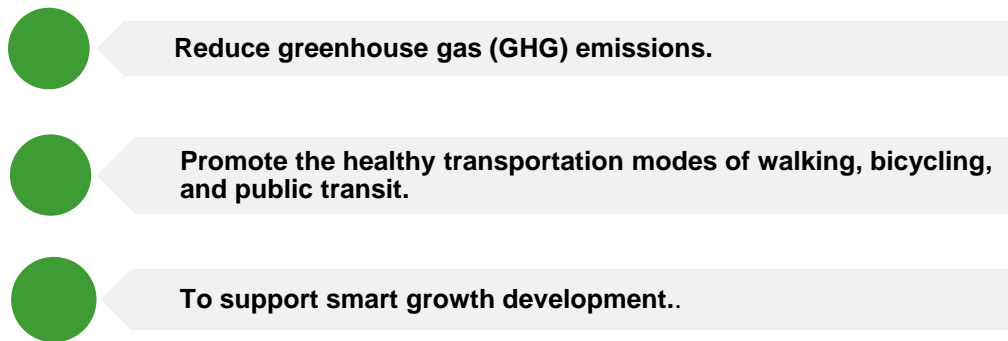
The Commonwealth’s Global Warming Solutions Act (GWSA) of 2008 requires statewide reductions in greenhouse gas (GHG) emissions of 25 percent below 1990 levels by the year 2020, and 80 percent below 1990 levels by 2050. As part of the GWSA, the Executive Office of Energy and Environmental Affairs developed the Massachusetts Clean Energy and Climate Plan (CECP), which outlines programs to attain the 25 percent reduction by 2020 – including a 7.6 percent reduction that would be attributed to the transportation sector.

**Figure VII-1: Targets for Overall Statewide GHG Emissions**



The Commonwealth’s thirteen metropolitan planning organizations (MPOs) are integrally involved in helping to achieve greenhouse gas reductions mandated under the GWSA. The MPOs work closely with the Massachusetts Department of Transportation (MassDOT) and other involved agencies to develop common transportation goals, policies, and projects that would help to reduce GHG emission levels statewide. For example, one of the programs in the CECP is MassDOT’s sustainability initiative known as GreenDOT. GreenDOT policy goals were developed in accordance with the GWSA, and are as follows:

**Figure VII-2: GreenDOT Policy Directive Principal Objectives**



The Central Massachusetts MPO shares in these goals and is working to meet the specific requirements of the GWSA regulation – *Global Warming Solutions Act Requirements for the Transportation Sector and the Massachusetts Department of Transportation (310 CMR 60.05)*. The purpose of this regulation is to assist the Commonwealth in achieving their adopted GHG emission reduction goals by:

- Requiring MassDOT to demonstrate that its GHG reduction commitments and targets are being achieved
- Requiring each MPO to evaluate and track the GHG emissions and impacts of its Regional Transportation Plan and Transportation Improvement Program
- Requiring each MPO, in consultation with MassDOT, to develop and utilize procedures to prioritize and select projects in its RTP and TIP based on factors that include GHG emissions and impacts

Meeting the requirements of this regulation will be achieved through the transportation goals and policies contained in the 2016 Regional Transportation Plan, the major projects planned in the RTPs, and the mix of new transportation projects that are programmed and implemented through the Transportation Improvement Program. The GHG tracking and evaluation processes enable

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the MPOs to identify the anticipated GHG impacts of the planned and programmed projects, and also to use GHG impacts as a criterion in prioritizing transportation projects. This approach by the MPO is consistent with the greenhouse gas reduction policies of promoting healthy transportation modes through prioritizing and programming an appropriate balance of roadway, transit, bicycle and pedestrian investments; as well as supporting smart growth development patterns through the creation of a balanced multi-modal transportation system. All of the MPOs and MassDOT are working toward reducing greenhouse gases with plans, actions, and strategies that include (but are not limited to):

- Reducing emissions from construction and operations
- Using more fuel-efficient fleets
- Implementing and expanding travel demand management programs
- Encouraging eco-driving
- Providing mitigation for development projects
- Improving pedestrian, bicycle, and public transit infrastructure and operations (healthy transportation)
- Investing in higher density, mixed use, and transit-oriented developments (smart growth)

## Regional GHG Tracking and Evaluation in RTPs

### *Mobility2040 GHG Evaluation*

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MassDOT coordinated with MPOs and regional planning agency (RPA) staffs on the implementation of GHG tracking and evaluation in development of each MPO's 2012 RTPs, which were adopted in September 2011. This collaboration has continued for the Central Massachusetts MPO's Mobility2040 long range transportation plan and 2016-19 TIPs. Working together, MassDOT and the CMMPO have attained the following milestones:

- Modeling and long-range statewide projections for GHG emissions resulting from the transportation sector for use before final Mobility2040 endorsement. Using the Boston MPO's regional travel demand model and the statewide travel demand model for the remainder of the state, GHG emissions will be projected for 2020 no-build and build conditions, and for 2040 no-build and build conditions. The results of this modeling will be available in a separate document.

- All of the MPOs will include GHG emission reduction projections in their RTPs, along with a discussion of climate change and a statement of MPO support for reducing GHG emissions as a regional goal.

MassDOT, using its statewide travel demand model, will provide the CMMPO with statewide estimates of CO<sub>2</sub> emissions resulting from the collective list of all recommended projects in all the Massachusetts RTPs combined (and supplemented by CO<sub>2</sub> emission reduction results for smaller, “off-model” projects supplied by the MPO). Emissions will be estimated using the new (2014) MOVES model, and also incorporate the latest planning assumptions including updated socio-economic projections for the Commonwealth.

The project mix from Mobility2040 (and all other RTPs) – modeled for both 2020 and 2040 using an Action (Build) vs. Baseline (No-Build) analysis to determine the CO<sub>2</sub> emissions attributed to all MPO’s mix of projects and smart-growth land use assumptions – is expected to show a neutral shift toward meeting the statewide greenhouse gas emissions reduction goal of 25 percent below 1990 levels by the year 2020, and 80 percent below 1990 levels by 2050. The reason for the anticipated neutral shift is that early indicators have shown that major infrastructure projects, both individually and collectively, would not trigger a significant change in GHG emission levels.

Working closely with MassDOT, the CMMPO continues to make efforts toward progress through planning activities to meet the GHG reductions targets and complying with the requirements of the GWSA. As part of this activity, the CMMPO will provide further public information on the topic and will continue to advocate for steps needed to accomplish the Central Massachusetts MPO’s and Commonwealth’s goals for greenhouse gas reductions, including a concerted effort to plan, promote, and program multi-modal, healthy, active transportation options.