To submit comments on this report please use the contact information below:

**Mr. Moreshwar Kulkarni**, Project Manager, Office of Highway Development

*Email:* mkulkarni@sha.state.md.us

*Address:* SHA Highway Design Division, Mail Stop C-102, 707 North Calvert Street, Baltimore, MD 21202

**Ms. Chrissy Brandt**, SHA Environmental Manager

*Email:* cbrandt@sha.state.md.us

*Address:* SHA Environmental Planning Division, Mail Stop C-301, 707 North Calvert Street, Baltimore, MD 21202
looks ok...thanks

Brian

On Thu, Nov 6, 2014 at 9:24 AM, Shawn Burnett <sburnett@wtbco.com> wrote:

Brian,

Please see attached revised letter report for the subject project to respond to your comment. Let us know if this adequately addresses your concern.

Thank you,

Shawn Burnett, P.E., P.T.O.E.

Senior Associate

The Wilson T. Ballard Company

410-363-0150
While it is correct that Project No. PG 333B21 does not lie within the specific carbon monoxide (CO) nonattainment district, Prince George’s County is treated as the maintenance area. The MPO and the MDE create the SIPs for CO based on the MSA/ CMSA boundaries and not the small voting districts from years ago. We suggest that CO be analyzed for this project just as was done for Project No. BA727A24 is located in Baltimore County, which lies outside of the Baltimore Central Business District but within the "maintenance area".

Thanks for the opportunity to comment

Brian

On Tue, Sep 23, 2014 at 2:11 PM, Shawn Burnett <sburnett@wtbco.com> wrote:

Good Afternoon,

On behalf of the Maryland State Highway Administration Environmental Planning Division, submitted herewith is the Air Quality Letter Report for the improvements to the I-495/Greenbelt METRO Interchange in Prince George’s County, Maryland.

SHA is requesting concurrence that this project meets the requirements of the Clean Air Act and 40 CFR 93 without an additional quantitative hot-spot analysis. The project is included in the current TIP as ID 2894.

Please review and provide concurrence/comments prior to October 8, 2014. Please let me know if you have any questions.

Thank You,

Shawn Burnett, P.E., P.T.O.E.

Senior Associate

The Wilson T. Ballard Company
--
Brian J. Hug
Deputy Program Manager
Air Quality Planning Program
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230
410-537-4125

--
Brian J. Hug
Deputy Program Manager
Air Quality Planning Program
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230
410 537 4125
EPA recomurs that this project does not require a quantitative hot-spot analysis.

-Asrah

Asrah,

MDE requested additional discussion of CO assessment for the subject project, and has concurred with the attached revised Air Quality Letter Report. On behalf of the Maryland State Highway Administration Environmental Planning Division, we request your comments/reconcurrence that the improvements to the I-495/Greenbelt METRO Interchange in Prince George’s County, Maryland does not require a quantitative hot-spot analysis by December 1, 2014.

Thank You,

Shawn Burnett, P.E., P.T.O.E.
Senior Associate
The Wilson T. Ballard Company
410-363-0150

EPA concurs with SHA’s recommendation that this project does not require a quantitative hot-spot analysis.

Thanks,

Asrah Khadr, Environmental Engineer, EIT
U.S. Environmental Protection Agency, Region III
From: Shawn Burnett [mailto:sburnett@wtbco.com]
Sent: Tuesday, September 23, 2014 2:12 PM
To: bhug@mde.state.md.us; Jeanette.Mar@dot.gov; McCurdy, Alaina; Rudnick, Barbara; Becoat, gregory; Khadr, Asrah; mrutkowski@mde.state.md.us; molly.berger@maryland.gov; jdesimone@mwcog.org
Cc: Jen Rohrer; Christina Brandt; Nicole M. Hebert; jkresslein@sha.state.md.us; DAtkins@sha.state.md.us
Subject: I-495/Greenbelt METRO Interchange - Air Quality Interagency Consultation

Good Afternoon,

On behalf of the Maryland State Highway Administration Environmental Planning Division, submitted herewith is the Air Quality Letter Report for the improvements to the I-495/Greenbelt METRO Interchange in Prince George’s County, Maryland.

SHA is requesting concurrence that this project meets the requirements of the Clean Air Act and 40 CFR 93 without an additional quantitative hot-spot analysis. The project is included in the current TIP as ID 2894.

Please review and provide concurrence/comments prior to October 8, 2014. Please let me know if you have any questions.

Thank You,

Shawn Burnett, P.E., P.T.O.E.
Senior Associate
The Wilson T. Ballard Company
410-363-0150
Shawn Burnett

From: Jeanette.Mar@dot.gov
Sent: Wednesday, December 03, 2014 6:40 PM
To: Shawn Burnett
Cc: Jen Rohrer; CBrandt@sha.state.md.us; Nicole M. Hebert; jkresslein@sha.state.md.us; DAtkins@sha.state.md.us
Subject: RE: I-495/Greenbelt METRO Interchange - Air Quality Interagency Consultation

Shawn:

FHWA has reviewed the additional discussion of CO assessment for the I-495/Greenbelt METRO Interchange project and concurs again that the I-495/Greenbelt METRO Interchange project meets the requirements of the CAA and 40 CFR 93 and does not need an additional quantitative hot-spot analysis. Please let me know if you need anything else.

Thanks!

Jeanette

Jeanette Mar
Environmental Program Manager
FHWA- Maryland Division
phone (410) 779-7152

From: Shawn Burnett [mailto:sburnett@wtbco.com]
Sent: Monday, November 10, 2014 11:59 AM
To: Mar, Jeanette (FHWA)
Cc: Jen Rohrer; CBrandt@sha.state.md.us; Nicole M. Hebert; jkresslein@sha.state.md.us; DAtkins@sha.state.md.us
Subject: RE: I-495/Greenbelt METRO Interchange - Air Quality Interagency Consultation

Jeanette,

MDE requested additional discussion of CO assessment for the subject project, and has concurred with the attached revised Air Quality Letter Report. On behalf of the Maryland State Highway Administration Environmental Planning Division, we request your comments/reconciliation that the improvements to the I-495/Greenbelt METRO Interchange in Prince George’s County, Maryland does not require a quantitative hot-spot analysis by December 1, 2014.

Thank You,

Shawn Burnett, P.E., P.T.O.E.
Senior Associate
The Wilson T. Ballard Company
Hi Shawn:

FHWA concurs that the I-495/Greenbelt METRO Interchange project meets the requirements of the CAA and 40 CFR 93 and does not need an additional quantitative hot-spot analysis.

Thanks!

Jeanette

Jeanette Mar
Environmental Program Manager
FHWA - Maryland Division
10 South Howard Street, Suite 2450
Baltimore, MD 21201
phone (410) 779-7152
fax (410) 962-4054

EPA concurs with SHA’s recommendation that this project does not require a quantitative hot-spot analysis.

Thanks,

Asrah Khadr, Environmental Engineer, EIT
U.S. Environmental Protection Agency, Region III
Good Afternoon,

On behalf of the Maryland State Highway Administration Environmental Planning Division, submitted herewith is the Air Quality Letter Report for the improvements to the I-495/Greenbelt METRO Interchange in Prince George’s County, Maryland.

SHA is requesting concurrence that this project meets the requirements of the Clean Air Act and 40 CFR 93 without an additional quantitative hot-spot analysis. The project is included in the current TIP as ID 2894.

Please review and provide concurrence/comments prior to October 8, 2014. Please let me know if you have any questions.

Thank You,

Shawn Burnett, P.E., P.T.O.E.
Senior Associate
The Wilson T. Ballard Company
410-363-0150
Mr. Burnett,

After reviewing the information in the November 6, 2014 letter from SHA’s Christina Brandt to TPB Chair, Patrick Wojahn, regarding the I-495/Greenbelt METRO Interchange, I concur that the project, which is included in the current CLRP and TIP and has undergone a regional conformity analysis, meets the requirements of the Clean Air Act and 40 CFR 93 without an additional quantitative hot-spot analysis.

Thank you,

Jane Posey

Jane A. Posey
Senior Transportation Engineer
Metropolitan Washington Council of Governments
202-962-3331

M. Gower-Lucas,

On behalf of the Maryland State Highway Administration concurrence from MWCOG has been requested that the subject project meets the requirements of the Clean Air Act and 40 CFR 93 without an additional quantitative hot-spot analysis per the attached.

Such concurrence has been received from MDE, EPA and FHWA for this project.

Could you identify the appropriate MWCOG personnel that should be contacted to pursuit MWCOG concurrence to complete the Interagency Consultation process?

Thank you
Shawn Burnett, P.E., P.T.O.E.
Senior Associate
The Wilson T. Ballard Company
410-363-0150
November 6, 2014

I-495/Greenbelt Metro Access Interchange Project
Prince George's County, Maryland

Mr. Patrick Wojahn
Transportation Planning Board Chair to the Metropolitan Washington Air Quality Committee
777 North Capitol Street, NE, Suite 300
Washington, DC 20002

Dear Mr. Wojahn:

The Maryland State Highway Administration (SHA) is proposing to complete interchange improvements in the vicinity of the Greenbelt Metro in Prince George's County, Maryland. The proposed improvements are 3 miles in length located along I-95/I-495 at the Greenbelt Metro and at the MD 201 (Kenilworth Avenue) interchanges. The limits are from U.S.1 (Baltimore Avenue) interchange to MD 295 (Baltimore Washington Parkway) interchange. The improvements at the Greenbelt Metro Station include a new flyover ramp from the Outer Loop of I-95/495 to the Metro station, a new direct ramp from the Metro station to the Inner Loop of I-95/495 and the realignment of the existing direct off-ramp from the Inner Loop adjoining the flyover ramp. Other improvements included in the scope of the project include widening of I-95/495 for full auxiliary lanes between the MD 201 and US 1 along the Outer Loop and Inner Loop, an auxiliary lane on the Inner Loop from MD 201 to the Baltimore/Washington Parkway, extension of the weave/acceleration lanes for the B/W Parkway cloverleaf on-ramps to I-95/I-495, extension of 2 multi-cell box culverts for Indian Creek (a tributary to Indian Creek), the widening of the Inner Loop bridge of I-95/495 over MD 193 and the widening and superstructure replacement of Inner and Outer Loop bridges over Rhode Island Avenue. Noise-barrier reconstruction is anticipated between U.S. 1 and Greenbelt Metro interchange along both sides of the I-95/495 and potentially a new noise barrier along the Inner Loop between Cherrywood Lane and MD 201. No through lanes are to be added on I-95/495 or MD 201 under the current design project.

CO Analysis
Prince George's County, Maryland is included as part of the Washington, DC-MD-VA Metropolitan Statistical Area (MSA). A portion of the MSA (Election Districts 2, 6, 12, 16, 17, and 18) in Prince George’s County had previously been designated as Nonattainment Areas for carbon monoxide (CO); however, these areas have been re-designated as a CO Maintenance Areas as of September 27, 2010. There are no CO nonattainment areas in Maryland. While the current CO Maintenance Areas
do not extend to the I-495/Greenbelt METRO project area, which is located in Election District 5, a qualitative CO assessment was conducted for this project.

The closest MDE ambient air monitoring stations to the study area is located at the Howard University Lab at 12003 Old Baltimore Pike Beltsville, Maryland (site 24033030). In addition, nearby ambient air monitoring stations include McMillan Pams at 2500 1st Street NW Washington D.C. (site 110010043) and River Terrace at 420 34th Street NE Washington D.C. All sites are in EPA Region 3. Monitored ambient air quality data within or near the study area for the years 2011-2013 is presented in Table 1.

As shown in Table 1, the maximum 1-hour monitored CO concentration of 23.9 ppm occurred in 2012 at Site 110010043, located at McMillan Pams in NW Washington D.C. This concentration is 68.3 percent of the 1-hour CO NAAQS of 35.0 ppm. The maximum 8-hour monitored CO concentration of 4.2 ppm occurred in the same year at the same site, which is 46.7 percent of the 8-hour NAAQS of 9.0 ppm.

As shown in Table 2, significant changes to traffic volumes and/or vehicle mix are not predicted to occur because of this project. The Greenbelt Metro Interchange Project does not result in significant increases in traffic volumes or changes in vehicle mix or other factors that would cause an increase in CO emissions relative to the No-Build conditions.

In conclusion, because the data presented in Table 1 demonstrates monitored CO concentrations in the project area are a percentage of the CO NAAQS, and the data in Table 2 demonstrates the project improvements will not result in significant increases in traffic volumes or changes in vehicle mix relative to the No-Build conditions, the construction of the Greenbelt Metro Interchange Project will not cause or contribute to a new violation of the CO NAAQS.

**PM$_{2.5}$ Analysis**

On January 5, 2005, the Environmental Protection Agency (EPA) designated the Washington, DC-MD-VA MSA as nonattainment for fine particulate matter, called PM$_{2.5}$. This designation became effective on April 5, 2005, 90 days after EPA’s published action in the Federal Register. Transportation conformity for the PM$_{2.5}$ standards applied on April 5, 2006, after the one-year grace period provided by the Clean Air Act (CAA). On November 13, 2009, EPA designated nonattainment areas based on the 2006 24-hour PM$_{2.5}$ NAAQS. The Baltimore region was not designated as nonattainment for the 2006 standard; therefore the designations based on the 1997 PM$_{2.5}$ NAAQS remain in effect.

On March 10, 2006, EPA issued amendments to the Transportation Conformity Rule to address localized impacts of particulate matter: "PM$_{2.5}$ and PM$_{10}$ Hot-Spot Analyses in Project-level Transportation Conformity Determinations for the New PM$_{2.5}$ and Existing PM$_{10}$ National Ambient Air Quality Standards" (71 FR 12468). These rule amendments require the assessment of localized air quality impacts of Federally funded or approved transportation projects in PM$_{10}$ and PM$_{2.5}$ nonattainment and maintenance areas. On December 20, 2010, EPA issued "Final Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM$_{2.5}$ and PM$_{10}$ Nonattainment and Maintenance Areas", (75 FR 79370), which helps state and local agencies complete quantitative PM$_{2.5}$ and PM$_{10}$ hot-spot analyses for project-level transportation conformity determinations of certain highway and transit projects. This guidance included a two-year grace period until December 20, 2012. Projects that require hotspot analysis for PM$_{2.5}$ are those that are Projects of Air Quality Concern as enumerated in 40 CFR 93.123(b)(1):
<table>
<thead>
<tr>
<th>Carbon Monoxide (CO) [ppm]</th>
<th>Site 240330030 Howard University Lab Beltsville MD</th>
<th>Site 110010043 McMillan Pams NW Washington D.C.</th>
<th>Site 11010041 River Terrace NE Washington D.C.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st Maximum</td>
<td>1.7  1.3  1</td>
<td>3.1  23.9  2.1</td>
<td>2.7  2.9  2.3</td>
</tr>
<tr>
<td>2nd Maximum</td>
<td>1.3  1.2  0.9</td>
<td>3.0  2.5  1.4</td>
<td>2.7  2.9  2.2</td>
</tr>
<tr>
<td>Actual Exceedances</td>
<td>0    0   0</td>
<td>0    0   0</td>
<td>0    0   0</td>
</tr>
<tr>
<td>8-Hour</td>
<td>1st Maximum</td>
<td>1.1  1.2  0.9</td>
<td>2.5  4.2  1.2</td>
</tr>
<tr>
<td>2nd Maximum</td>
<td>0.8  0.9  0.9</td>
<td>2.4  1.9  1.1</td>
<td>2.3  2.5  1.9</td>
</tr>
<tr>
<td>Actual Exceedances</td>
<td>0    0   0</td>
<td>0    0   0</td>
<td>0    0   0</td>
</tr>
</tbody>
</table>
Table 2. Traffic Volume Projections for Greenbelt Metro Interchange Project  
Current Design

<table>
<thead>
<tr>
<th>Condition</th>
<th>2014</th>
<th>2020 No Build</th>
<th>2020 Build</th>
<th>2040 No Build</th>
<th>2040 Build</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADT</td>
<td>217,765</td>
<td>242,000</td>
<td>240,700</td>
<td>248,950</td>
<td>247,650</td>
</tr>
<tr>
<td>% Trucks (ADT)</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>Number of Trucks</td>
<td>21,777</td>
<td>24,200</td>
<td>24,070 (-130)</td>
<td>24,895</td>
<td>24,765 (-130)</td>
</tr>
<tr>
<td>ADT</td>
<td>213,155</td>
<td>223,300</td>
<td>240,700</td>
<td>228,650</td>
<td>247,650</td>
</tr>
<tr>
<td>% Trucks (ADT)</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>Number of Trucks</td>
<td>21,316</td>
<td>22,330</td>
<td>24,070 (+1,740)</td>
<td>22,865</td>
<td>24,765 (+1,900)</td>
</tr>
<tr>
<td>ADT</td>
<td>216,130</td>
<td>237,900</td>
<td>239,500</td>
<td>245,050</td>
<td>246,550</td>
</tr>
<tr>
<td>% Trucks (ADT)</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>Number of Trucks</td>
<td>21,613</td>
<td>23,790</td>
<td>23,950 (+160)</td>
<td>24,505</td>
<td>24,655 (+150)</td>
</tr>
</tbody>
</table>

(i) New highway projects that have a significant number of diesel vehicles, and expanded projects that have a significant increase in the number of diesel vehicles;  
(ii) Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project;  
(iii) New bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location;  
(iv) Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location; and  
(v) Projects in or affecting locations, areas, or categories of sites which are identified in the PM$_{10}$ or PM$_{2.5}$ applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violations.
As discussed in the examples of the preamble to the March 10, 2006 Final Rule for PM$_{2.5}$ and PM$_{10}$ Hot-Spot Analyses in Project-Level Transportation Conformity Determinations (71 FR 12491), for projects involving the expansion of an existing highway, 40 CFR 93.123(b)(1)(i) has been interpreted as applying only to projects that would involve a significant increase in the number of diesel transit buses and diesel trucks on the existing facility.

The currently approved National Capital Region Transportation Planning Board (NCRTPB) 2013 Long Range Plan (LRP), along with the 2013-2018 Transportation Improvement Program (TIP), have been determined to conform to the requirements of the CAA Amendments of 1990. These represent the currently conforming LRP and TIP in accordance with 40 CFR 93.114. The current design project is included in both the current CLRP and TIP under CLRP ID 1479 and TIP ID 2894.

SHA has determined that the project is not a project of air quality concern and, therefore, a hot-spot analysis is not required. SHA has prepared the following assessment of the current design:

- The current design project is considered under the following paragraphs of 40 CFR 93:
  - 40 CFR 93.123(b)(1)(i), as amended, which includes “New highway projects that have a significant number of diesel vehicles, and expanded projects that have a significant increase in the number of diesel vehicles.”

- The project does not meet the criteria set forth in 40 CFR 93.123(b)(1)(i) to be considered a project of “air quality concern” based on the following considerations:
  - The current design project involves supporting Transit Oriented Development (TOD) by improving connectivity between the Greenbelt Metro Station and associated interchanges along I-95/495 (Capital Beltway) in Prince George’s County.
  - As shown in Table 2, the project will not result in a significant increase in trucks along this segment of I-95/495.
  - Since the project only involves extending auxiliary lanes along to I-95/495, and two new ramps to provide the missing movements to and from the Greenbelt Metro Station, it does not add through capacity to any road in the study area.
  - The current design project will not result in meaningful changes between No-Build and Build traffic volumes, vehicle mix, or location of the existing facility. A review of the traffic data in Table 2 demonstrates that there will not be a significant increase in the number of trucks.

- The existing Average Daily Traffic (ADT) along this portion of I-95/495 varies between 106,165 vehicles per day (VPD), and is projected to be 118,525 VPD in 2020 No Build conditions, 122,800 VPD in 2020 Build conditions, 126,900 for 2040 No Build conditions, and 126,225 for 2040 Build. The existing ADT along the I-95/495 outer loop between MD 201 and MD 295 is 109,105 vehicles per day (VPD), and is projected to be 119,700 VPD in 2020 No Build conditions, 120,600 VPD in 2020 Build conditions, 123,275 for 2040 No Build conditions, and 124,075 for 2040 Build. ADT along both segments increases between 2020 No Build and Build, however ADT along both segments decreases between 2040 No
Build and Build. Trucks account for 10% of the 2014 ADT and are projected to remain at 10% of all future conditions (see Table 2).

- A review of the traffic data above demonstrates that there will not be a significant increase in the number of trucks from the No-Build condition to the Build. The current design project has been designed to improve connectivity between interchanges along I95/495, rather than increase corridor capacity; therefore, there is no substantial change expected in the no-build and build traffic volumes or vehicle mix. Unless predicated by significant land use changes (heavy truck generators), existing truck percentages are used as the primary factor in determining future percentages. With truck percentages predicted to be maintained in Build conditions, the current design projects are not to have a significant increase in the number of diesel vehicles and will not require hotspot analysis for PM$_{2.5}$ per 40 CFR 93.123(b)(1)(i).

- Section 176(c) of the CAA and the Federal Conformity Rule require that transportation plans and programs conform to the intent of the air quality state implementation plan (SIP) through a regional emissions analysis in PM$_{2.5}$ nonattainment areas. The NCRTPB serves as the Metropolitan Planning Organization (MPO), and therefore it is responsible for the regional conformity determination. As noted earlier, the current design project is included in both the current CLRP and TIP under CLRP ID 1479 and TIP ID 2894.

Based on review and analysis as discussed above, it is determined that the current design project will meet the CAA and 40 CFR 93.109 requirements for Fine Particulate Matter – PM$_{2.5}$. These requirements are met without a hot-spot analysis because the project has not been found to be a project of air quality concern as defined under 40 CFR 93.123(b)(1). The project will not cause or contribute to a new violation of the PM$_{2.5}$ NAAQS, or increase the frequency or severity of an existing violation.

**MSAT Analysis**

In addition to the criteria air pollutants for which there are National Ambient Air Quality Standards (NAAQS), EPA also regulates air toxics, including Mobile Source Air Toxics (MSAT). The six prioritized MSATs are: Benzene; Acrolein; Formaldehyde; 1, 3-Butadiene; Acetaldehyde; and Diesel Exhaust (Diesel Exhaust Gases and Diesel Particulate Matter). On February 3, 2006, FHWA issued the *FHWA Guidance on Air Toxic Analysis in NEPA Documents*, which requires analysis of MSAT under specific conditions.

The purpose of the current design project for improvements to the Greenbelt Metro interchange and associated interchanges along I-95/495 is to facilitate planned Transit Oriented Development (TOD) by providing improved access to and from the Greenbelt Metro Station. These improvements will occur by widening auxiliary lanes to provide ramp connections along I-95/I-495 from US 1 to MD 201, including two new ramps to provide the missing movements to and from the Greenbelt Metro Station.

The current design project has been determined to generate minimal air quality impacts for CAA Amendment criteria pollutants and has not been linked with any special MSAT concerns. As such, the current design project will not result in substantial changes in traffic volumes, vehicle mix, basic
project location, or any other factors that would cause an increase in MSAT impacts of the projects from that of the no-build alternative.

Moreover, EPA regulations for vehicle engines and fuels will cause overall MSAT emissions to decline significantly over the next several decades. Based on regulations now in effect, an analysis of national trends with EPA’s MOVES model forecasts a combined reduction of over 80 percent in the total annual emission rate for the priority MSAT from 2010 to 2050 while vehicle-miles of travel are projected to increase by over 100 percent. This will both reduce the background level of MSAT as well as the possibility of even minor MSAT emissions from this project. The current design projects would be considered as: “Projects with No Meaningful MSAT Effects, or Exempt Projects,” as described in the FHWA December 6, 2012 memorandum “Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA.”

**Conclusion**

The purpose of the project focuses on providing access to and from the Greenbelt Metro Station in order to facilitate planned Transit Oriented Development (TOD) by. The project is not predicted to cause or exacerbate a violation of the NAAQS.

Copies of the Air Quality Analysis will be circulated to FHWA, EPA, and MDE for a 15-day Interagency Consultation review and comment period. After comments have been received and addressed from Interagency Consultation, the Air Quality Analysis will be placed on SHA’s website for a 15-day public review and comment period.

We therefore request that the Interagency Consultation Group provide their agreement that the proposed project meets the requirements of the Clean Air and 40 CFR 93 without an additional quantitative hot-spot analysis.

Sincerely,

Christina Brandt  
Environmental Manager  
Maryland State Highway Administration

cc: Mr. Gregory Beacoat, Environmental Protection Agency  
Mr. Brian Hug, Maryland Department of the Environment  
Ms. Jeanette Mar, Federal Highway Administration