The Honorable Ron Natinsky
Chair, Regional Transportation Council
Councilmember, City of Dallas
1500 Marilla Street
Room 5 FN
Dallas, Texas 75201

Dear Councilmember Natinsky:

Thank you for your February 10, 2011 letter on behalf of the North Central Texas Council of Governments’ (NCTCOG) Regional Transportation Council. We understand the concerns you have raised regarding the transportation ramifications to the North Central Texas area if the United States Environmental Protection Agency’s (EPA) new motor vehicle emissions modeling tool, Motor Vehicle Emission Simulator (MOVES), is not incorporated into our current air quality plans. The EPA’s delay in finalizing an updated ozone standard, as well as updates to the initial MOVES model, allow the Texas Commission on Environmental Quality (TCEQ) to shift resources to reconsider incorporating MOVES into current Dallas-Fort Worth area State Implementation Plan revision efforts. We are making every effort to accommodate your request to incorporate MOVES at this time.

Because the intensive technical work involved in developing attainment demonstration and reasonable further progress plans began before a fully developed MOVES model was available, our current plans were developed using the previous model, MOBILE6.2. As you indicated, initial sensitivity tests by the EPA and others have indicated a significant increase in estimated nitrogen oxide emissions when switching from the older model to the new one.

The TCEQ has conducted preliminary analyses to gauge the impact such an increase might have on our current attainment demonstration and reasonable further progress efforts if we were to switch models at this time. Our initial analysis indicates there is a possibility for successfully incorporating MOVES into our current plans if the necessary work from both the TCEQ and NCTCOG can be completed in conjunction with our established deadlines. However, there is still significant work to be done before a final determination can be made.
We must also be cognizant of our January 19, 2012 deadline for submitting an attainment demonstration and reasonable further progress plan, as outlined in the December 20, 2010 issue of the Federal Register (75 FR 79302). We will continue to work with NCTCOG toward the goal of incorporating MOVES into our current plans, but with the understanding that these plans are subject to change based on more detailed analysis and any other unforeseen circumstances.

If you have any further questions, please contact Mr. David Brymer, Air Quality Division Director, at 512-239-1725.

Sincerely,

Susana M. Hildebrand, P.E.
Chief Engineer

cc: Mr. Michael Morris, P.E., Director of Transportation, NCTCOG
    Mr. Chris Klaus, Senior Program Manager, NCTCOG