## C.5 RESPONSES TO COMMENTS FROM IAC PARTICIPANTS

## **Comments from TDEC:**

The resolution on page v, in the 5th paragraph includes the 1997 Annual PM NAAQS.

**Response: Corrected** 

Page 2: under "Emissions Analysis Summary", last sentence, you have an "either" in there that you don't need.

Response: Corrected

Page 15: The last sentence has a "the" instead of a "be".

Response: Corrected

Page 28: The title to Table 12 may actually need to be for the ozone NAAQS.

Response: Corrected

Was there intended to be a Section A.2 with tables for the 1997 Area emissions?

Response: Table was added summarizing county-level emissions for the 1997 Ozone Area.

Table B-2: Is this table missing other counties (Loudon, Jefferson, Sevier)?

Response: All counties applicable to either the 1997 or 2008 Ozone standards were added to the table.

In Table B-2, in looking at the 2024 VMT for Knox County, it looks like the VMT in the SQL output database is 18,800,904, which differs from the results in Table B-2. It appears that VMT is only missing from sourcetype 62. Response: There was an error in the spreadsheet calculation where the pivot table that was created did not include all rows of data – this was corrected.

Table B-3, looking at the annual VMT for Knox County in 2040, the HPMSVTypeYear file indicates a total of 7,802,889,357 miles, which varies from the total amount in Table B-3 (but not by a whole lot), and also appears to vary significantly from the SQL movesactivtyoutput table results.

Response: It was discovered that the MySQL script that was used to summarize the MOVES Activity Output table was causing some VMT data to be lost. The script was revised and re-run for all outputs and the corrected information has been updated in the report.

## Comments from FHWA:

Pg.1 – Overview and Purpose - To be clear, the court decision itself did not reinstate the requirement for the 1997 Ozone areas to conduct transportation conformity; this resulted from FHWA's *Interim Guidance on Conformity Requirements for the Ozone NAAQS* (dated 4/23/18), which is our agency's action to comply with the intent of the court's decision while waiting on guidance from EPA.

Response: Additional verbiage added to clarify that it was the FHWA guidance that triggered the conformity.

Pg.1 – The area has not formally been designated as maintenance for the 1997 Ozone standard. As previously stated, the area is required to conformity determinations to comply with FHWA's guidance, but EPA has not issued any guidance or designations for the 1997 Ozone NAAQS. Technically, this standard is still revoked for the Knoxville region.

Response: Deleted "Maintenance"

Pg. 2 – For my own clarification - the 1997 Ozone NAAQS is the only standard which includes a portion of the Lakeway MTPO, correct? In the past, was this CDR also taken before the Lakeway MTPO Board as well as Knoxville, and incorporated into the Lakeway MTP?

Response: That is correct. LAMTPO will adopt a resolution on or near the same date as the TPO to recognize the conformity determination.

Pg. 6 – Was the area then designated "maintenance area"? When did this occur - same time (March 2011)?

Response: Yes, we transitioned to a Maintenance Area until the time it was revoked with the institution of the 2008 8-Hour Standard.

Pg. 9 – Consider clarifying the difference between an interpolated year and an analysis year.

Response: Added clarification

Pg. 15 – Table 8, Check title - looks like this carried over from the previous table.

Response: Correction made

Pg. 15 – Table 8, Inferring that this TIP ID is either the ID from the Lakeway TIP or the rural STIP, correct? Why the missing fields (ex: Veterans Blvd/SR-449 is in the STIP and has a STIP ID, but this field is blank)?

Response: STIP IDs were added for the projects that were missing them.

Pg. 18 – Table 9, Check title

Response: Correction made