

VIRGINIA DEPARTMENT OF TRANSPORTATION

ENVIRONMENTAL DIVISION

INSTRUCTIONAL AND INFORMATIONAL MEMORANDUM

DIRECTED TO: District Engineers District Project Development Engineers District PIM District Environmental Managers District Planners Central Office TMPD	AUTHORITY: N/A
GENERAL SUBJECT: Air Quality	NUMBER: IIM-ED-202
SPECIFIC SUBJECT: Ensuring Consistency in the Development of Emissions Benefit Estimates for Transportation Projects	DATE: 07/06/2023
	SUPERSEDES: N/A
APPROVED: Christopher J Swanson For Public Distribution 2023.07.10 08:53:24-04'00'	

BACKGROUND

The Virginia Department of Transportation (VDOT) Environmental Division requests that consistent and appropriate calculation methodologies be used in the development of air quality emissions benefit estimates associated with transportation projects, as needed. Projects that may require an estimate of emissions benefits include National Environmental Policy Act (NEPA) studies for highway widening projects, planning studies, grant applications, and projects applying for funding under the Congestion Mitigation and Air Quality (CMAQ) and Interstate Operations and Enhancement Programs. Emissions benefit estimates may be needed for pollutants such as carbon monoxide (CO), nitrogen oxides (NOx), volatile organic compounds (VOC), particulate matter (PM), mobile source air toxics (MSAT), and/or greenhouse gas (GHG) emissions and its components.

Most transportation projects initiated by the Department do not require an estimate of air quality emissions benefits, and therefore such estimates do not need to be developed. Projects that typically do not require an estimate of emissions benefits include maintenance projects, those exempt from the Environmental Protection Agency's [transportation conformity rule](#), those utilizing state/local (non-federal) funding, and projects qualifying for a Programmatic Categorical Exclusion (PCE) for NEPA that meet the applicable criteria outlined in the Instructional and Informational Memoranda (I&IM) titled [Air and Noise Scoping Requirements for PCEs](#). Before moving forward with any emission benefit estimates, it is recommended that the project manager/planner first check with the District Environmental Manager on the need for such estimates.

PURPOSE

The purpose of this memorandum is to ensure that consistent and appropriate calculation methodologies are used in the development of emission benefit estimates for transportation projects and studies, when needed. This will help ensure that all emissions benefit estimates represent actual anticipated pollutant impacts using the latest calculation methodologies, which is important since the estimates may be reviewed by various stakeholders and/or used in subsequent studies to report cumulative statewide and/or regional project emissions impacts.

SCOPE & APPLICABILITY

These requirements shall apply to any VDOT project, study, or related document for which an air quality emissions benefit estimate is being calculated and/or reported.

REQUIREMENTS

When an air quality emissions benefit estimate is being developed, VDOT and/or associated consultant staff shall coordinate with Central Office Environmental Air Quality staff for review of all air quality emissions benefit estimates so that consistent and appropriate calculation methodologies are applied statewide. Approval by Central Office Air Quality staff must be granted in order for the project, study, or related document to move forward with the emissions benefit estimate. When consultants are involved, Central Office Air Quality staff shall be offered the opportunity to review and approve the applicable scope of work prior to issuance of the Notice-To-Proceed, along with review and approval of the emissions benefit estimate once completed.

PROCEDURES/REPORTING

Coordination shall be initiated by contacting the Central Office Air & Noise Program Manager

by email and/or phone, and by forwarding all pertinent project data, i.e., project/study details, traffic data, emission benefit calculation methodologies and results. Central Office Air Quality staff shall review and provide comments and/or approval of all emissions benefit estimates within two weeks of receipt of adequate project-related data.

OTHER INFORMATION

[Air and Noise SharePoint Online Page](#) - Central Office Air Quality staff contact information (VDOT internal link).