

Attachment

**NH Dept. of Environmental Services, Air Resources Division  
Comments on the Strafford Regional Planning Commission 2011-2035 Metropolitan  
Long Range Transportation Plan, 2011-2014 Transportation Improvement  
Program, and Associated Air Quality Analysis**

1. The Light Duty Vehicle (LDV) emission factors provided by DES display as three decimal places. Upon using the Microsoft Excel Lookup function, LDV numbers are extracted to seven decimal places, thus affecting the accuracy of modeling calculations. As a result, please ensure that SRPC's off-model calculations utilized these emission factors rounded to the nearest three digits.

-We have made sure to round to three decimal places in our analysis.

2. Appendix 5 – “Individual Off-Model” utilizes emission factors that do not conform to the data last updated by NH DES, and provided to the MPOs for this conformity determination, on July 7, 2010. Please ensure that the appropriate emission factors are used for all off-model analyses.

-The emission factors used in the “Off Model Analysis” were submitted, reviewed, and approved by the CMAQ Air Quality analysis committee (NH DES sat on this committee). These analyses have gone through the regional CMAQ scoring process and are now at the State scoring process therefore we feel it is too late to change these at this point. Note: No credit is being taken for these off model analyses.

3. The “Exempt” Statewide Project #14932 in Appendix 1 of the AQA (Page 23) was listed as two separate projects (construction years 2011 and 2012). This project, however, appeared only once in the TIP.

-Exempt Project #14932, statewide program Safe Routes to School is funded for two years FY11 and FY12. Funding for both years is shown in the 2011-2014 TIP project list. The duplicate listing on the “Exempt” project list in the Air Quality Analysis document was deleted.

4. Air quality Analysis page 35 (Appendix 6: Emissions Model Inputs and Emission Factors) provides “New Hampshire MOBILE 6.2 Inputs” but does not provide the “Light Duty Vehicle”, “Urban Bus”, or “All Vehicle” emission factors. Please include this emission factors information in Appendix 6 and ensure that this data was used for modeling.

-Summary table of emission factors is now included on page 35.

5. Project 11238 (L, Q, & O) are listed in the AQA “Not-Exempt” (Appendix 2) and TIP documents. “Not-Exempt” projects 11238**S** and 11238**R** are also listed in the 2015-2020 LRTP project table, but are not included in the AQA listing.

-Phases S & R have now been included in the “Non-Exempt” list in the AQA document. (Page 25)

6. Several “Exempt” projects that are listed in the TIP are also specifically referenced in the AQA. For consistency, please include the following “Exempt” TIP projects in the AQA:

**A.** Page 1 – Milton #15905 – Bridge Rehabilitation/Deck Replacement over RR- 212/128

-Milton is currently in an attainment area and at this point is not required to be included in the AQA document.

**B.** Page 3 – Somersworth, NH – Berwick, ME – Rehab Bridge over Salmon Falls River

-This project is now listed in the “Exempt” list of the AQA document (page 20)

**C.** Page 3 – Statewide – 15263A- Complex Bridge Inspection

-This project is now listed in the “Exempt” list of the AQA document (page 21)

**D.** Page 6 – Statewide – UBI- Underwater Bridge Inspection

-This project is now listed in the “Exempt” list of the AQA document (page 21)

**E.** Page 6 - Statewide Special – 10336 - In-house administration of the FHWA

Supportive Services Program

-This project is now listed in the “Exempt” list of the AQA document (page 21)

**F.** Page 6 - Statewide Special – 10334 – Technical assistance Program to Rural Communities& Organizations throughout the state

-This project is now listed in the “Exempt” list of the AQA document (page 21)

**G.** Page 6 - Statewide Trac – 13668 – Implement and participate in AASHTO Trac Program

-This project is now listed in the “Exempt” list of the AQA document (page 21)

7. The “Not-Exempt” Statewide Project – Programmatic operational funding support for TMC & ITS – Transportation Systems Management & Operations was listed in the TIP on Page 5. This Project was not listed in the AQA.

--This project is now listed in the “Non-Exempt” list of the AQA document (page 26)

### **Additional Comments Received**

1. Somersworth NH– Berwick ME, #12228, is managed by Maine DOT. (SRPC Technical Advisory Committee meeting October 1, 2010)
  - Addressed by changing the comment in the 2011-2014 TIP project list (page 29)
2. Metropolitan Transportation Plan project: Dover, Route 108 from Weeks Corner Intersection to intersection with Granite Parkway in Rochester, should only be included as an illustrative project. (SRPC Technical Advisory Committee meeting October 1, 2010)
  - Addressed by changing this to a “vision project” in the 2011-2035 MTP project list (page 207, MTP). It was also moved from the “Exempt” list in the AQA to the “Vision Project” list in the AQA for consistency.
3. Financial Constraint portion of the documents must do a better job at showing funding to SRPC region by funding category. More detailed calculations are necessary to show constraint. (SRPC Technical Advisory Committee meeting October 1, 2010)
  - Financial constraint has been completely reworked and breaks all funding down to funding category. A methodology section was created to outline how constraint was proven. This was done for the TIP and for the Metropolitan Transportation Plan. New lists and methodology are included starting on page 10 in the TIP and on page 187 of the MTP.
4. Rochester NH, project #14350, NH 202A (Walnut St), Right of way funding is not shown in the TIP.
  - “While I am unable to attend the meeting this morning, I did review the packet. I must object to dropping right of way acquisition for Strafford Square (project #14350) from the TIP in 2012. The note states construction in 2015 as the rationale. This is a project that has been in the TIP for several

years. Final engineering is well underway, the City purchased one property a couple of years ago as it was bank-owned and we are pursuing the other property that would be a necessary acquisition. Right of way sometimes takes a considerable amount of time to acquire. With construction in 2015, it makes absolutely no sense to drop ROW from this TIP.” (Rochester Public Works Director)

- Comment was taken under consideration and posed to NH DOT. DOT response:

Good afternoon,  
The ROW associated with the project has not been removed and is programmed for 2012. The project is considered part of the Municipal Urban Projects – Compact Areas (MUPCA) program. As a result of the project’s association to the statewide program, the ROW phase was not included in the information provided to SRPC for the new TIP.

To SRPC, please accept this email as official comment on the draft TIP to include ROW in the amount of \$542,000 as STP funds in 2012 for Rochester 14350. The funds for this phase were included in the MUPCA statewide program and will not impact the constraint of the program.

Nick Alexander  
NHDOT

As advised by NH DOT we added this project and the ROW to 2012 in the TIP project list. (Page 28)

5. Minor changes to “Project Status” list (suggestions from Public Comment @ the Policy Committee meeting, October 15, 2010) Pages 25 and 26 of TIP.
  - Durham US RT 4- RT 108, moved year of construction from 2011 to 2014
  - Durham TE project #14405, for a multi-use path, changed status to “Completed” 2010
  - Durham project # 13870, CNG fueling Station, year changed from 2009 to 2011, and the status of “completed” was changed to “On Schedule.”
  - COAST project for Rochester – Dover – Newington – Portsmouth, Express Bus Service. CMAQ project # 13880, changed status to “Delayed Federal Funding Available, No Local Match.”
  - Update Rochester 202A Walnut St. Project #14350 to show year of construction as 2015, and status change to “On Schedule.”