



COLORADO
Department of Transportation
Division of Transportation Development

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DATE: February 14, 2019

TO: Colorado Regional Planning and Environmental Managers

FROM: Rose Waldman, CDOT EPB Air Quality and Noise Program Manager

SUBJECT: Release of CDOT Air Quality Project-Level Analysis Guidance (AQ-PLAG)

Background: Until today, [Chapter 9](#) of the [CDOT NEPA Manual](#) was the most current version of CDOT guidance on how to complete a project-level air quality analysis for CDOT projects. It was most recently updated in August 2017 and contains an overview but does not have many details. CDOT is beginning to update the *CDOT NEPA Manual*. However, the update is not anticipated to be completed until the end of 2019. The updated manual will reflect this new guidance, the AQ-PLAG.

Appendix F of the *NEPA Manual*, which contains standard greenhouse gas (GHG) language, will also be updated. Because the AQ-PLAG refers to updated GHG standard language, the updated language was released via memorandum on February 14, 2019. Its subject is “Update to CDOT NEPA Manual, Appendix F – Standard Language (Global Climate Change Cumulative Effects Standard Language).”

CDOT released air quality guidance on a specific topic via a [memorandum](#) on November 21, 2017. Its topic is “Transportation Conformity: Exempt Project Interpretations for 40 CFR 93.126.” It remains in effect and is referenced by the AQ-PLAG.

Rationale for Guidance: Because CDOT did not have detailed guidance on how to complete a project-level air quality analysis or how to document that analysis, it was determined guidance should be created.

Guidance Applicability: This AQ-PLAG (February 2019, Version 1) shall be used on projects that have a Scoping Date that is on or after February 14, 2019. It may be used on projects that have a Scoping Date prior to February 14, 2019. Scoping Date is defined as the earliest of the following:

- Scoping meeting
- Environmental kick-off meeting
- EPB Environmental Clearance Request

Guidance Highlights: The following are highlights of the new AQ-PLAG:

1. Clarification to analysis procedures is provided in Chapters 4 to 11. Analysis procedures have not changed. They are largely based on Environmental Protection Agency (EPA) and/or Federal Highway Administration (FHWA) regulation and guidance, except for the greenhouse gas (GHG) analysis procedure.
2. Reporting requirements, previously described only via an overview in the CDOT *NEPA Manual*, are described in Chapters 13 and 14. This guidance will lead to more consistent and complete air quality technical reports and air quality sections of NEPA documents (e.g., Environmental Assessments [EAs]). These clarifications and expansion of requirements are primarily based on American Association of State Highway and Transportation Officials (AASHTO) recommendations.
3. Modeling files are now required to be submitted electronically as part of the air quality technical report submittal.
4. Consultant qualifications are described in Section 1.3.
5. This guidance was written with several audiences in mind. Chapters 1 and 2 are primarily introductory and provide general air quality background information to those who are not familiar with transportation air quality. Chapters 3 and 12 and Sections 2.2 and 2.5 are primarily for transportation project managers. Chapters 4 to 11 are primarily for transportation air quality analysts. Chapters 13 and 14 are primarily for those who write air quality technical reports and/or air quality sections of transportation NEPA documents.
6. GHG analysis procedures and reporting requirements are described in Chapter 9 and Sections 13.9 and 14.3.6. These refer to Appendix F of the CDOT *NEPA Manual*, which contains GHG standard language. At the time the AQ-PLAG was published, Appendix F had not yet been updated with the 2019 GHG standard language. Therefore, a memorandum was published to CDOT's air quality website in February 2019 containing the new standard language. The first six paragraphs apply to EAs and Environmental Impact Statements (EISs). The remaining four paragraphs and table only apply to EISs.

Individuals/Entities Impacted by Procedural Directive: This memorandum and the AQ-PLAG applies to all divisions, Regions, offices and branches of CDOT. It also applies to consulting firms performing contracted work for CDOT as well as Local Agencies and quasi-governmental entities performing work under CDOT's authority.

Effective Date: Immediate

Please distribute this information to the appropriate individuals and offices in your Region. If there are questions or concerns regarding the AQ-PLAG, please contact me at (303) 757-9016 or rose.waldman@state.co.us.