



Russell R. McMurry, P.E., Commissioner
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May 6, 2019

Moises Marrero
Georgia Division Administrator
Federal Highway Administration (FHWA)
Atlanta Federal Center
61 Forsyth Street, S.W.
Suite 17 T100
Atlanta, Georgia 30303-3104

Dear Mr. Marrero:

Re: Georgia Department of Transportation (GDOT) SEP-16 Letter of Interest – Project-Level Air Quality Assessments for Transportation Conformity and Air Toxics

Under FHWA established Special Experimental Project (SEP-16) authority granted in 23 USC 502(b) to test and evaluate delegation of program-level responsibilities of the Federal-aid highway program to States, GDOT is submitting a Letter of Interest to request delegation of authority for the review and ultimate approval of Project-Level Air Quality Assessments in an experimental capacity. Based on GDOT's past experience and success in conducting project-level Air Quality Assessments for transportation projects in accordance with federal requirements for Transportation Conformity and Air Toxics, we believe delegation of these program-level responsibilities would reduce unnecessary administrative review, particularly since air-related comments are rarely received from FHWA.

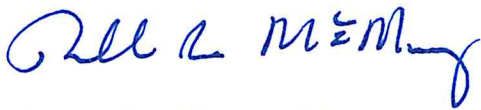
Through existing programmatic agreements with FHWA for project-level analysis of carbon monoxide, GDOT has demonstrated experience with program-level delegation, with a keen understanding of and adherence to The Clear Air Act and its Amendments, and the application of 23 CFR Part 771. Our intention would then be to pursue future internal programmatic approaches and streamlining efforts that can save countless hours in project-level assessments, while establishing specific policies and guidance documentation for DOT's methodology for project-level carbon monoxide assessments that would allow for time savings in minimizing detailed, redundant analyses for projects that have no likelihood in approaching the NAAQS thresholds for carbon monoxide emissions.

While there are currently no areas within Georgia classified as nonattainment for PM_{2.5}, in the past GDOT has always demonstrated understanding and diligence in assessing projects in their eligibility for exemption from project-level hotspot analyses. If PM_{2.5} nonattainment areas were ever to return to Georgia, GDOT would expect to save between 15-30 days in coordination time with FHWA per project for those residing within the PM_{2.5} nonattainment area, should we be granted the authority as the lead agency to coordinate directly with the Georgia Interagency Group.

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In this effort, GDOT requests delegation of program-level responsibilities in assessing project-level carbon monoxide analyses, for the coordination with the Georgia Interagency Group on matters regarding project-level air assessment, and to be granted responsibility for establishing policy demonstrating dutiful application of these regulations. If granted this authority, GDOT hopes to gain greater familiarity and experience with the delegation of program-level responsibilities, and ultimately become more comfortable in taking on a greater level of responsibility to reduce the need for FHWA review of subject-matter assessments, while also creating a more efficient pathway for the establishment of project-level Air Assessment policy and guidance documentation.

Sincerely,



Russell R. McMurry, P.E.
Commissioner, Georgia Department of Transportation

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cc: Hiral Patel
Eric Duff
Jim Pomfret
Miles Kemp