

MOVES Workshop June 14-16, Ann Arbor MI

Susan E. Hardy
Air Quality Program Manager
Mountainland Association of Governments

Comments /Requests

EPA MOVES Model is, by Federal Rule, the approved and indeed the mandated (Excluding California) Emission Estimation/Rate generator for SIP preparation and Conformity analyses (when grace period ends.)

As such, The MPOs and State Transportation and Air agencies, are interested in the close and continuous dialogue with EPA's Mobile group of model developers to facilitate better application practices tailored to the unique challenges these users face.

The bullets below are just a few and immediate request for attention that hopefully can be addressed in the very near future:

- Following the request to “streamline” input burden – please automate the “leap year “ flag, develop audit tools – especially intermediary steps to check input accuracy/verification that the right input was used,
- Add multiple year and multiple county options to a run rather than the currently mandated one year /one run option
- Since conformity for any 24hour standard has a representative DAY budget – create a DAY model domain in addition to the Annual domain currently available.
- Apply consistently input fields – always require State **and** County IDs – it is easy to paste a neighboring county data in the wrong place and only find out after running it (considering the length of time each run takes....)
- Expand guidance on automating multiple tab inputs (large excel files with multiple tabs cannot be uploaded easily)
- Since Urban and Rural drive cycles are identical in the default model – merge these two into one category – just because HPMS has that “distinction” is not a good enough reason to have this additional category – especially since not having any driving activity specified – the “national default” will still assign “off network” emission to it....
- Above 2012 there is no Fuel specific input capability. Our current SIP preparation work needs input beyond 2012!
- Alternative fuels category needs special attention – in particular to facilitate comparisons of different control strategies!!
- Same issue with Alternative vehicles. Hybrid technology currently is unavailable to model – and that again hinders the analysis of control strategies.
- Conformity analysis can span 30 and 40 year plan horizons – it is unreasonable to assume the same technologies and efficiencies of 2012 will remain constant throughout these horizon years – nevertheless we are required to use the model as is to approve the analysis.
- IM program : it is a real burden to have to create a new file for each year of a multiple year analysis. A 6 year exemption program needs a tailored file for each year in the analysis. It is hard to extract “mix and match” credits for different components of an IM program so as to

evaluate the effectiveness AND benefits of the program. Apparently no credit is allocated for continuous OBD test. Is there a way for a user to map 100% effectiveness?

In summary – please remember that the MPO/State agencies – responsible for SIP and Conformity work are generally less concerned with the Global and Scientific research this tool, no doubt, is capable of, but rather with the regulatory and prosaic emission budgets and limits. And as such, need the efficient and flexible options analyses with relative confidence that the results are accurate and reasonable.

Thank you for giving us this forum opportunity. We hope for a continuous dialogue and improvement as we progress.

Susan Hardy

Susan E. Hardy
Architect/Urban Planner

Air Quality Program Manager
Mountainland Association of Governments
586 east 800 north
Orem, Utah 84097- 4146

Phone - (801) 229-3842
Fax - (801) 229-3801

email: shardy@mountainland.org