

**2015/2020 Ozone Projections for the Denver Region and Proposed
Improvements
to the Denver Photochemical Modeling Databases**

Local Government Coalition Recommendations:

1. **Phase I Scope:** All tasks appropriate and necessary

2. **Phase II Scope:** All are not needed at this time.
 - a. **YES:**
 - i. **Task 13:** MM5 nudging, especially for two July episodes, diurnal evaluation
 - ii. **Task 15:** Oil and Gas Emissions Update
 - iii. **Task 17:** NFRCOG VMT

 - b. **NO/MAYBE:**
 - i. **Task 12:** Existing air toxics MOBILE6.2 speciation could be compared with Smoke processed outputs. Primary emissions of formaldehyde are minute, secondary formation dominates
 - ii. **Task 14:** Not pertinent for evaluation of NOx strategies
 - iii. **Task 16:** It is common sense to fully validate the model we already use before we start comparing it to another model's results

Given that funding has not been identified for Phase II, the LGC asks the RAQC to give highest priority to Tasks 13, 15, 17. We believe that Tasks 12, 14, 16 could be informative during the SIP modeling for 75ppb, but would not be the best use of limited resources at this time.

The LGC is committed to working with RAQC, CDPHE and any other stakeholders to improve ozone model performance. DEH has offered to provide staff time and technical resources for a collaborative effort. We look forward to working with you and hope that a technical work group could be formed to address these issues outside of a larger policy discussion.