



February 12, 2020

The Honorable Kelly Russell, Chair
National Capital Region Transportation Planning Board
777 North Capitol Street, NE, Suite 300
Washington, D.C. 20002

Dear Chair Russell:

Thank you for providing an opportunity to comment on the draft air quality conformity analysis for the 2020 amendment to the Visualize 2045 plan. MWAQC has reviewed the above analysis and concurs that the transportation sector emissions associated with the proposed transportation plans meet the motor vehicle emissions budgets (MVEBs) in the 2008 Ozone National Ambient Air Quality Standard (NAAQS) Maintenance Plan.

However, the 2020 amendment to the Visualize 2045 plan continues to require use of Tier 2 transportation buffers for 2025 and 2030. Therefore, TPB had to use the Tier 2 MVEBs buffers for demonstrating conformity in those two years. MWAQC urges TPB and its members to give particular focus to projects that would reduce air pollution emissions from the transportation sector so that future mobile emission budgets remain within Tier 1 MVEBs to fully protect the health of our residents.

This is particularly important as the Washington region faces continuing challenges related to air quality. The region needs to attain the 2015 ozone standard of 70 ppb by August 2021. The draft data for the period 2017 through 2019 shows the region's design value for ozone at 72 ppb. The draft base year 2017 emissions inventory developed recently by MWAQC shows on-road sources constitute 39% of total NOx emissions in the region. This evidence shows that even though the region has made significant progress in reducing emissions, it needs to continue its efforts to further reduce emissions to meet the 2015 ozone NAAQS, including on-road mobile sources.

MWAQC notes that the region also is experiencing an increase in total VMT along with an increase in population and job growth. Therefore, we urge TPB's continued investment in VMT and emission reduction strategies such as public transit, ride-sharing, pedestrian and bike infrastructure, other travel demand management strategies, and Transportation Emission Reduction Measures (TERMS) to reduce future growth in vehicle emissions.

Thank you again for the opportunity to comment on the draft conformity analysis for the 2020 amendment to the Visualize 2045 plan.

Sincerely,

Hon. Brandon Todd
Chair, Metropolitan Washington Air Quality Committee