

Metropolitan Washington Air Quality Committee

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October 2, 2014

Honorable Patrick Wojahn, Chair
National Capital Region Transportation Planning Board
777 North Capitol Street, NE
Washington, D.C. 20002

Dear Chair Wojahn:

Thank you for providing an opportunity to the Metropolitan Washington Air Quality Committee (MWAQC) to comment on the 2014 Constrained Long Range Plan (CLRP) and the FY2015-2020 Transportation Improvement Program (TIP). MWAQC has reviewed the draft Air Quality Conformity assessment and concurs that the transportation sector emissions associated with the proposed transportation plans meet the approved motor vehicle emissions budgets (MVEBs) for the 1997 8-hour ozone national ambient air quality standard (NAAQS); the MVEBs found adequate for the 1997 annual fine particulate matter (PM_{2.5}) NAAQS; and the approved MVEB for the carbon monoxide (CO) NAAQS.

The Washington region is currently working toward meeting the more stringent 2008 ozone standard of 75 parts per billion (ppb). Draft data from the air quality monitors for the period 2012 through 2014 shows the region's design value for ozone is now at 76 ppb; an indication that the air quality has been improving over the years and now there is a strong likelihood that the region will be able to attain the above NAAQS by the required deadline of December 2015. However, since the Washington region's compliance with the 2008 ozone NAAQS will be based on its ambient air quality levels during the period 2013 through 2015, the region would still need to continue its efforts of reducing emissions from both transportation and non-transportation sectors to make sure it is able to meet the above NAAQS by 2015.

MWAQC also notes that U.S. Environmental Protection Agency (EPA) is scheduled to propose a revised and potentially tougher ozone NAAQS likely somewhere in the range of 60-70 ppb in December 2014 and is expected to finalize it by October 2015. Therefore, the region would need to reduce its emissions even further in order to meet the above expected tougher NAAQS. While the recently adopted Tier 3 program will provide significant emissions reduction benefits from the transportation sector, MWAQC will need the support and consultation with TPB to examine emissions from the transportation sector and to identify new cost-effective strategies and opportunities to reduce emissions in order to meet the above expected tougher NAAQS. Please note that the MWAQC also intends to work with the non-transportation related sectors to reduce emission from those sectors in order to meet the expected tougher attainment requirements.

In its PM_{2.5} Maintenance Plan submitted in May 2013 to the EPA , the Washington region committed to update MVEBs for PM_{2.5} and oxides of nitrogen (NO_x) using the latest models by the end of 2015. EPA released a new version of the mobile emissions model called MOVES2014 in July 2014. This model includes the recently published Tier 3 vehicle emission and fuel standards rule as well as two greenhouse gas rules for motor vehicles. MWAQC would like to work with TPB to update the annual PM_{2.5} and NO_x MVEBs described in the above plan using the MOVES2014 model, updated 2014 motor vehicle registration data, and the most current version of TPB's Travel Demand Model.

MWAQC is encouraged to learn that the region is actually achieving reductions in per capita vehicle miles travelled (VMT), even with an increase in employment. We urge TPB's continued investment in VMT and emission reduction strategies including public transit, ride-sharing, and transit-oriented development, for example, to continue to mitigate future growth in vehicle emissions. MWAQC strongly urges TPB to maintain its commitments to Transportation Emission Reduction Measures and other emission reduction measures. All of these efforts are essential to meet the 2008 ozone standard and potentially more stringent ozone and fine particle standards expected in the future.

Thank you again for the opportunity to comment on the draft conformity analysis.

Sincerely,

Hon. David Snyder, Chair
Metropolitan Washington Air Quality Committee