

Metropolitan Washington Air Quality Committee

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January 12, 2005

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

Dear Chair Mendelson:

The Metropolitan Washington Air Quality Committee (MWAQC) has reviewed the November 30, 2004 draft *8-hour Ozone Standard Conformity Assessment, supplement to the Air Quality Conformity Determination Of The 2004 Constrained Long Range Plan And The FY2005-2010 Transportation Improvement Program For The Washington Metropolitan Region*. We are pleased the proposed transportation plan meets the approved mobile emissions budgets set for 2005.

As allowed by EPA in the interim before 8-hour mobile budgets are developed and approved, conformity for the 8-hour ozone standard is being tested against the 1-hour ozone mobile budgets in the 2003 SIP. We note that this supplemental analysis for 2010 uses the same methods and inputs as the recently completed conformity determination for the one-hour ozone standard, except that 2010 was added as a new analysis year.

The conformity analysis indicates significant reductions in transportation emissions occurring by 2010 and beyond, creating a significant gap between the emissions budget and the estimated levels of transportation emissions. The reasons for this significant gap include: (1) the emissions budgets correspond to the 2005 attainment year for the 1-hour standard and not the attainment year for the 8-hour standard (year 2010); (2) federal emissions control measures for gas and diesel vehicles and fuels provide much of the reductions, and (3) recent improvements made to the transportation demand model. It must be noted that the gap is temporary since the existing, 1-hour standard-based emissions budgets will be replaced by new emissions budgets for the 8-hour ozone standard corresponding to year 2010. The new emission budgets to be developed in 2006 may be ready for use in evaluating transportation conformity for the 2007-2012 TIP.

As we stated in our October 27, 2004 letter to Chair Zimmerman, States and local governments are urged to maintain their commitments to TERMS and other emission reduction measures, regardless of whether implementation of these measures is currently necessary for conformity. Meeting the 8-hour ozone standard is expected to be a much more difficult effort, requiring continuation of all mobile and non-mobile emission reduction commitments, and possibly new ones in the near future.

Thank you for the opportunity to comment on the draft conformity analysis. We look forward to working closely with you on making further improvements to the region's air quality to meet the new 8-hour standard.

Sincerely,



Hon. T. Dana Kauffman, Chair
Metropolitan Washington Air Quality Committee