

**\*\*\*\*DRAFT 3.22.06\*\*\*\***

## **Metropolitan Washington Air Quality Committee**

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March 22, 2006

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

Dear Chair Knapp:

Thank you for soliciting input on the scope of work for the Air Quality Conformity Assessment: 2006 CLRP and the FY2007-2012 TIP. As proposed in TPB's scope of work, the TPB intends to complete the conformity determination for fine particulates, ozone, and carbon monoxide concurrently. The determination will be based on guidance from EPA regarding demonstrating conformity during the interim period prior to development of SIP budgets for ozone and fine particulates.

We support the use of the interim ozone mobile emissions budgets based on the approved 1-hour ozone SIP budgets, and the interim PM<sub>2.5</sub> emissions test of build no greater than 2002 baseline. We support TPB's choice of these interim methods because they are the approved interim methods in the absence of approved budgets. For the fine particulate determination, we support the TPB proposed approach of emissions analysis and conformity determination only for direct PM<sub>2.5</sub> and for precursor NO<sub>x</sub>. The state air agencies are working to determine which of the other precursors of PM<sub>2.5</sub> (VOCs, SO<sub>x</sub>, ammonia etc.) contribute significantly for possible inclusion in the analysis for the next conformity cycle and beyond, but these determinations are not yet available.

We encourage the TPB and state air agencies to work together so that this year's analysis will reflect latest planning assumptions and inputs. Staff are developing new temperature and humidity values and are working on new methods to analyze emissions on an annual basis. Additionally, we understand that the Planning Directors of the Metropolitan Development Policy Committee (MDPC) have indicated that the Cooperative Forecast Round 7.0 will not be updated this year, therefore, potential changes in travel demand resulting from pending Department of Defense base realignments and closures in the region will not be reflected in the regional emission analysis for conformity or the new SIP mobile budgets being developed this year.

Meeting the 8-hour ozone and PM<sub>2.5</sub> standards is expected to require continuation of all mobile and non-mobile emission reduction commitments, and possibly new ones in the near future. 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 needed for conformity determination during the interim period.

Thank you for the opportunity to comment on the conformity assessment scope of work. We look forward to working closely with you on making further improvements to the region's air quality to meet the new standards.

Sincerely,  
Hon. Phil Mendelson, Chair  
Metropolitan Washington Air Quality Committee