



MEMORANDUM

TO: TPB Technical Committee
FROM: Lyn Erickson, Plan Development and Coordination Program Director
SUBJECT: Summary of Comments Received and Proposed Responses on the FY 2021-2024 Transportation Improvement Program, the 2020 Amendment to Visualize 2045, and the Air Quality Conformity Analysis
DATE: March 6, 2020

On January 31, 2020, the draft FY 2021–2024 Transportation Improvement Program (TIP), the draft 2020 Amendment to Visualize 2045, and the draft Air Quality Conformity Analysis were released for a 30-day public comment and inter-agency review period. The board was briefed on the TIP, the amendment to Visualize 2045 and the conformity analysis at its February 19 meeting. The comment period closed on March 1. The board will be briefed on the comments received and recommended responses and asked to accept the comments for inclusion in the documentation of the FY 2021–2024 TIP and the Air Quality Conformity Analysis at its March 18 meeting.

Comments could be submitted via email, an online form, telephone or postal service. No comments were received from the public on the FY 2021–2024 TIP or the 2020 Amendment to Visualize 2045.

A letter commenting on the Air Quality Conformity Analysis was received from the Metropolitan Washington Air Quality Committee (MWAQC). The letter is attached to this memo and the response recommended by TPB staff for inclusion in the documentation of the TIP and the conformity analysis is provided in the summary air quality conformity report. The language from the report is included on page 2 of this memo for your reference.

The District and Virginia departments of transportation (DDOT and VDOT), as well as the Washington Metropolitan Area Transit Authority (WMATA) provided some technical corrections to projects, descriptions and funding amounts listed during the inter-agency review period. None of the changes submitted are considered regionally significant and they do not have any impact on the results of the conformity analysis.

EXCERPT FROM AIR QUALITY CONFORMITY SUMMARY REPORT:

COMMENTS / RESPONSE TO COMMENTS

Comment: The Metropolitan Washington Air Quality Committee (MWAQC) provided written comment in its February 26, 2020 letter. The letter states that MWAQC concurs that the transportation sector emissions associated with the transportation plan meet the motor vehicle emissions budgets for ozone season pollutants, as is necessary to meet conformity requirements. The Committee points out that the TPB had to use the Tier 2 transportation buffers to demonstrate conformity for two analysis years, and recommends that the TPB focus on projects that would reduce emissions. MWAQC indicates that it will be a challenge to meet the 2015 ozone standard by the August 2021 deadline, and points out that a recent 2017 inventory shows that on-road sources contribute 39% of NOx emissions in the region. The committee notes the region's forecast growth in VMT along with an increase in population and jobs, and urges TPB's continued investment in public transit, ridesharing, pedestrian and bicycle infrastructure, and Transportation Emission Reduction Measures (TERMS) to mitigate future growth in vehicle emissions.

Response: The TPB appreciates MWAQC's concurrence that the air quality conformity analysis of the 2020 Amendment to the Visualize 2045 Plan and FY 2021-2024 TIP meets all of the required emissions tests. The TPB notes that the Tier 2 budgets were put in place to account for changes in technical inputs or assumptions for the travel demand or emissions models, or for changes in the analysis methodology from when the budgets were originally set, compared to those used in the current conformity analysis. As described in the regional air quality conformity analysis report, there were numerous updates to input data and methods in this conformity analysis, relative to the analysis used to set the mobile budgets, that necessitated using the Tier 2 levels of emissions budgets. The TPB notes that even under the current circumstances on-road vehicular emissions are well within the levels needed for the region to maintain compliance with the 2008 ozone national Ambient Air Quality Standards (NAAQS). It is also noted that on-road vehicular source emissions have steadily declined over the past couple of decades, and are forecast to continue to decline, both overall, and as a percentage of the whole inventory. The TPB agrees that there should be a continued effort to reduce emissions across all sectors to meet current and future tougher air quality NAAQS. The TPB also agrees with MWAQC on the need for continued investment in public transit, ridesharing, pedestrian and bicycle infrastructure, and other programs to reduce emissions.



February 26, 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 recently developed and approved for public hearing and comments 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,

A handwritten signature in black ink that reads "Brandon Todd".

Hon. Brandon Todd
Chair, Metropolitan Washington Air Quality Committee