

# **Metropolitan Washington Air Quality Committee**

Suite 300, 777 North Capitol Street, N.E. Washington, D.C. 20002-4239 202-962-3358 Fax: 202-962-3203

\*\*\*MWAQC TAC REVIEW DRAFT DO NOT CITE OR QUOTE\*\*\*

November 10, 2010

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

Dear Chair Snyder:

The Metropolitan Washington Air Quality Committee (MWAQC) has reviewed the October 20, 2010 Draft Air Quality Conformity Assessment for the 2010 CLRP and FY 2011-2016 TIP. We are pleased that the emissions of the precursors of ground level ozone (VOC and NO<sub>x</sub>) and fine particulate matter (PM<sub>2.5</sub> direct and precursor NO<sub>x</sub>) from the proposed transportation Plan (2010 CLRP) and Transportation Improvement Program (FY2011-2016 TIP) conform to the applicable motor vehicle emissions budget tests.

We observe that the estimated ground level ozone precursors meet both the approved 1-hour ozone standard emissions budgets as well as the new 2008 Reasonable Further Progress (RFP) ozone motor vehicle budget which became effective on September 21, 2009. We acknowledge that new ground level ozone precursor emissions budgets for the 8-hour ozone standards has been submitted to the US EPA but are yet to be approved and/or found adequate for use in transportation conformity analyses. We are pleased that the estimated emissions from the 2010 CLRP/FY 2011-2016 TIP conform to these proposed attainment budgets even though it is not yet a requirement.

MWAQC also observes that the estimated emissions of PM<sub>2.5</sub> pollutants both direct particles and precursor NO<sub>x</sub> passes the build no greater than 2002 interim emissions test. We acknowledge that the region has submitted new PM<sub>2.5</sub> emissions budgets which are yet to be approved and/or found adequate for use in transportation conformity analyses. We are pleased that the PM<sub>2.5</sub> emissions estimates for the 2010 CLRP and FY 2011-2016 TIP conform to these proposed emissions budgets even though it is not yet a requirement.

MWAQC acknowledges the expectation that there will be substantial reductions in transportation emissions occurring by 2030, resulting in transportation emissions well below the current maximum allowable emission levels. MWAQC notes that this analysis now includes a new out year milestone year (2040) and that VOC and PM<sub>2.5</sub> emissions between 2030 and 2040 actually show a slight increase. This is likely attributable to anticipated continued growth in VMT and the declining impact of federally mandated emission control programs, which by 2040 is assumed to have fully penetrated the fleet providing their maximum benefit. Through the Ozone Transport Commission (OTC) states are pressing EPA for new federal emission control programs to provide new approaches to reducing emissions in our future fleets. MWAQC also encourages continued leveraging of our long standing investment in public transit, ride-sharing and transit oriented development by continuing to dedicate

needed resources for the enhancement and expansion of such systems and programs so as to reduce future growth in single occupant vehicular trips and vehicle miles traveled.

As you are aware, the EPA recently promulgated more stringent National Ambient Air Quality Standard (NAAQS) for both 8-hour ozone and PM<sub>2.5</sub>. EPA is also now considering whether to further tighten the ozone NAAQS and has released a new motor vehicle emission model that could substantially affect emission estimates in the region even if there are no changes to the transportation network. When the region is designated as a nonattainment area under these new standards, additional emission reductions will be needed across all sectors to meet these new more stringent standards. State Implementation Plans will be due to EPA three years after the nonattainment designations are finalized. We continue to strongly urge state and local governments to maintain their commitments to Transportation Emission Reduction Measures (TERMs) and other emission reduction measures to advance meeting the new ozone and particulate matter standards as soon as possible. We also recommend that the TPB consider supporting new federal vehicle and/or vehicle fuel oriented emissions reductions regulations that can reduce future mobile source emissions and help the region meet the tougher air quality standards.

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.

Sincerely,

Hon. Leta Mach, Chair  
Metropolitan Washington Air Quality Committee