

Metropolitan Washington Air Quality Committee

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* * *COMMITTEE REVIEW DRAFT* * *

December 9, 2009

Hon. Sharon Bulova, Chair
Greater Washington 2050 Coalition
777 North Capitol St., NE, Suite 300
Washington, D.C. 20002

Dear Chair Bulova:

Thank you for the opportunity to comment on the Greater Washington 2050 Coalition's report, "Region Forward." We commend the Greater Washington 2050 Coalition for addressing the greatest challenges facing the region that lie ahead in regional planning, transportation, health, environment, economy, housing and education. As the Metropolitan Washington Air Quality Committee's (MWAQC's) mission is to prepare regional air quality plans to meet federal health standards, we strongly support the environmental goal for air quality, but we recommend that the air quality target be modified as described below.

The report's proposed goal of meeting and exceeding standards for air quality is one that we strongly endorse. MWAQC has been committed to this achievement since the early 1990s. In fact, the region has made tremendous progress in cleaning the air and meeting federal health standards for carbon monoxide, lead, and particulate matter. The region is very close to meeting the 1997 ozone standard; the number of days when the region exceeds the ozone standard has dramatically declined in the past five years. The region meets the health standards for fine particles.

Target:

The proposed target, "to reduce the number of days exceeding the air quality standards below 2008 levels," may be unachievable due to regular changes in federal air quality standards.

MWAQC proposes that the target be changed to read: "Beginning in 2014, the region's air quality will be better than required by federal air quality standards." The year 2014 is selected because it is the first year that is an official EPA indicator of the region's ability to meet the newest ozone standard.

Measurement:

When EPA periodically revises air quality health standards, it almost always has made the standards more stringent. The effect of more stringent standards is that the number of exceedance days ("Code Red" and "Code Orange") goes up, even though the actual air quality is not worse. Simply measuring the number of exceedance days from year to year is not a useful comparison.

MWAQC proposes that the *design value* be used to assess the trend in monitored air quality. This is a better measure for two reasons. First, this is the measure for federal compliance: EPA uses the design value as the official indicator of compliance with the federal air quality standards. Second, a trend line of design values over a period of years is a clear indication of the region's progress in cleaning the air.

Thank you again for the opportunity to review and comment on the Coalition's ambitious report. MWAQC is committed to improving air quality for the health of all residents and the environment. We support the Coalition's vision for a cleaner, more sustainable environment. MWAQC will make every effort to contribute to the vision by planning to "meet and exceed" standards for air quality in the region.

Please contact Joan Rohlf, COG's Chief of Air Quality Planning, at 202/962-3358 should you have any questions or require additional information.

Sincerely,

Phil Mendelson, Chair