

Metropolitan Washington Air Quality Committee

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September 29, 2015

Honorable Philip Mendelson, Chair
National Capital Region Transportation Planning Board
777 North Capitol Street, NE, Suite 300
Washington, D.C. 20002

Dear Chair Mendelson:

Thank you for providing an opportunity to the Metropolitan Washington Air Quality Committee (MWAQC) to comment on the draft 2015 Constrained Long Range Plan (CLRP) and the FY2015-2020 Transportation Improvement Program (TIP). MWAQC has reviewed the draft Air Quality Conformity assessment and concurs that the transportation sector emissions associated with the proposed transportation plans meet the approved motor vehicle emissions budgets (MVEBs) for the 1997 8-hour ozone national ambient air quality standard (NAAQS), the 1997 annual fine particulate matter (PM_{2.5}) NAAQS; and the 1971 carbon monoxide (CO) NAAQS.

The Washington region is currently working toward meeting the 2008 ozone standard of 75 parts per billion (ppb). Data for the period 2012 through 2014 showed the region's design value for ozone at 76 ppb, which indicated that the region did not attain the above NAAQS by the deadline (July 20, 2015). However, the region requested the U.S. Environmental Protection Agency (EPA) to extend the above attainment deadline by one year to July 20, 2016 based on the Clean Air Act provisions. EPA has proposed the approval of the extension request. Draft data (as of September 22, 2015) for the period 2013 through 2015 shows the region's ozone design value is now at 70 ppb, has made significant progress and is likely to meet the current ozone NAAQS of 75ppb.

However, MWAQC also notes that EPA recently proposed a revision to the ozone NAAQS in the range of 65-70 ppb. EPA is expected to publish the final NAAQS by October 1, 2015. The region may need to reduce its emissions even further in order to meet the tougher standard. While the recently adopted Tier 3 program will provide significant emissions reduction benefits from the transportation sector, MWAQC will need the support and consultation with TPB to examine emissions and to identify new cost-effective strategies and opportunities to reduce onroad mobile emissions further in order to attain a lower standard. In that respect, MWAQC appreciates the efforts of the Multi-Sector Greenhouse Gas Work-Group to reduce greenhouse gas and ozone precursors, such as nitrogen oxides (NO_x), from transportation and non-transportation sectors.

In its PM_{2.5} Maintenance Plan submitted in May 2013 to the EPA, the Washington region committed to update MVEBs for PM_{2.5} and NO_x using the latest models. EPA released a new

version of the mobile emissions model called MOVES2014 in July 2014. This model includes the recently published Tier 3 vehicle emission and fuel standards rule as well as two greenhouse gas rules for motor vehicles. MWAQC appreciates that TPB is using MOVES2014, the 2014 motor vehicle registration data, and the most current version of TPB's Travel Demand Model to update the annual PM_{2.5} and NO_x MVEBs.

MWAQC is encouraged to learn that the region is actually achieving reductions in per capita vehicle miles travelled (VMT), even with an increase in employment. We urge TPB's continued investment in VMT and emission reduction strategies such as public transit and ride-sharing, to continue to mitigate future growth in vehicle emissions. MWAQC strongly urges TPB to maintain its commitments to Transportation Emission Reduction Measures and other emission reduction measures. All of these efforts are essential to meet the 2008 ozone standard and potentially more stringent ozone standard expected in October this year and to maintain the attainment status for the 2012 annual PM_{2.5} standard.

Thank you again for the opportunity to comment on the draft conformity analysis.

Sincerely,

A handwritten signature in blue ink, appearing to read 'DSnyder', with a long horizontal flourish extending to the right.

Hon. David Snyder
Chair, Metropolitan Washington Air Quality Committee