

Metropolitan Washington Air Quality Committee

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June 24, 2009

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

Dear Chair Jenkins:

The Metropolitan Washington Air Quality Committee (MWAQC) has reviewed the June 11, 2009 draft *Air Quality Conformity Determination Of The 2009 Constrained Long Range Plan And The FY2010-2015 Transportation Improvement Program For The Washington Metropolitan Region*. We are pleased the proposed transportation plan meets both the interim emissions tests and the proposed new motor vehicle emissions budgets for both the 8-hour ozone and PM_{2.5} standards.

As allowed by EPA in the interim before 8-hour ozone and PM_{2.5} mobile budgets are developed and approved, conformity for the 8-hour ozone standard is being tested against the 1-hour ozone mobile budgets in the region's approved SIP. For PM_{2.5}, the region selected the build no greater than 2002 interim emissions test in this year's conformity analysis. We note that this analysis uses the same approach as the conformity determination for the 2008 CLRP and FY 2009-2014 TIP. We are concerned about the extended delay in EPA action on the mobile budgets proposed in 2007 and 2008.

We note that projected 2010 motor vehicle emissions in the region are closer to the proposed new 2010 mobile budgets than they were last year. We recognize that the 2010 mobile emissions budget was included in 8-Hour Ozone Attainment Demonstration because the Transportation Planning Board agreed to provide emissions reductions in 2010 to help meet requirements of the Clean Air Act. Changes in the socio-economic trends in the region can result in changes in the mobile source emissions, thereby affecting the region's air quality. The assumptions in the modeling are updated on a regular basis to reflect these changes in the Washington region. In light of the current economic downturn, we should watch these trends carefully to ensure continuing compliance with the proposed mobile budgets.

For future years, we acknowledge the expectation that there will be substantial reductions in transportation emissions occurring by 2020 and in succeeding years, resulting in transportation emissions well below the current maximum allowable emission levels. However, as you're aware, the EPA recently promulgated more stringent National Ambient Air Quality Standard (NAAQS) for both 8-hour ozone and PM_{2.5}. EPA is also now considering whether to lower the ozone NAAQS even further and may release a new motor vehicle emission model that could substantially affect emission estimates in the region. If the region is designated as a nonattainment area under these new standards, State Implementation Plans will be due to EPA in 2013. Additional emission reductions will very likely be needed across all sectors to meet these new more stringent standards. 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.

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. Phil Mendelson, Chair

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