

Metropolitan Washington Air Quality Committee

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November 10, 2011

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

Dear Chair Bowser:

The Metropolitan Washington Air Quality Committee (MWAQC) has reviewed the Draft Air Quality Conformity Assessment for the 2011 CLRP. The analysis demonstrates the proposed transportation plan meets the interim emissions tests for the PM_{2.5} annual standard and the approved motor vehicle emissions budgets for the ozone standard.

Conformity of the estimated emissions from the 2011 CLRP is being tested for the 8-hour ozone standard against the 2008 8-hour ozone reasonable further progress (RFP) mobile budgets contained in the region's submitted ozone SIP. The 2008 Reasonable Further Progress (RFP) motor vehicle budget became effective on September 21, 2009. For PM_{2.5}, the revised air quality the conformity analyses passes the "build no greater than 2002" interim emissions test the region had previously selected. We commend the National Capital Region Transportation Planning Board (TPB) for its contribution to clean air through compliance with the proposed motor vehicle emissions attainment budgets in the 8-hour ozone SIP and the annual PM_{2.5} SIP submitted to EPA in 2007 and 2008. This commitment is consistent with the region's air quality attainment plan and vital to the region's progress toward attainment and maintenance of these standards.

As you are aware, the EPA will soon release implementation guidance for the new 2008 ozone National Ambient Air Quality Standards (NAAQS) for 8-hour ozone of 75 ppb. EPA and the states are currently working to finalize area designations for the region. Based on current air quality monitoring data, the region will be designated nonattainment for the new standard. When the region is designated as a nonattainment area under these tighter new standards additional emission reductions will be needed across all sectors to meet these new more stringent standards. Through our interagency consultation process, we will need to explore development of a new lower motor vehicle emission budget to meet the new lower ozone standard. While we support EPA's proposal to extend the grace period for mandatory use of the new MOVES model for conformity, we look forward to working with you in the coming year to continue to transition to the new model and to begin to develop new proposed motor vehicle emission budgets using MOVES.

Additionally, through the Ozone Transport Commission, Maryland, Virginia and the District of Columbia are urging EPA for new federal emission control programs to provide new approaches to reducing emissions in our future fleets. MWAQC also supports the need for new federal emission control programs and encourages continued investment in public transit, ride-sharing and transit-

oriented development to enhance and expand such systems and programs to reduce future growth in single occupant vehicular trips and vehicle miles traveled. We also 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 tighter ozone and particulate matter standards as soon as possible. Now that the region has attained the PM_{2.5} standard and is seeking redesignation, the region may avoid future nonattainment designations as the federal standards are reviewed by using a proactive approach.

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. Redella "Del" Pepper, Chair
Metropolitan Washington Air Quality Committee