

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

February 23, 2011

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

Dear Chair Bowser:

Thank you for soliciting input on the scope of work for the Air Quality Conformity Assessment: 2011 CLRP, and a revised scope for the amended 2010 CLRP. MWAQC has reviewed the proposed scopes of work and supports the approach for this year's conformity determination.

Conformity of the estimated emissions from the 2011 CLRP will be tested for the 8-hour ozone standard against the approved 2008 8-hour ozone reasonable further progress (RFP) mobile budgets contained in the region's SIP. The 2008 RFP motor vehicle budget became effective on September 21, 2009. Testing against the 1-hour ozone SIP budget is no longer required. For the fine particle standard (PM_{2.5}), the "build no greater than 2002" interim emissions test will be used. We commend the National Capital Region Transportation Planning Board (TPB) for its contribution to clean air through continued demonstration of 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 is now considering whether to further tighten the recently promulgated more stringent National Ambient Air Quality Standards (NAAQS) for 8-hour ozone. 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. A new State Implementation Plan will be due to EPA three years after the nonattainment designation is finalized. Additionally the EPA has recently 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 and/or actual emissions. All of these anticipated actions emphasize the need for planning to reduce future emissions in the region. 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 tighter ozone and particulate matter standards as soon as possible.

Thank you for the opportunity to comment on the draft conformity scope of work. We look forward to working closely with you on making further improvements to the region's air quality.

Sincerely,


Redella Pepper, Chair
Metropolitan Washington Air Quality Committee