

DRAFT

Metropolitan Washington Air Quality Committee

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December 9, 2005

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

Dear Chair Mendelson:

The Metropolitan Washington Air Quality Committee (MWAQC) has reviewed the November 16, 2005 (and December 2, 2005 supplement) draft *Fine Particles (PM_{2.5}) Standards Air Quality Conformity Assessment: Supplement to the Air Quality Conformity Assessment of the 2005 Constrained Long Range Plan Amendments and FY2006-2011 Transportation Improvement Program* for the Washington Metropolitan Region. We are pleased the proposed transportation plan meets the interim emissions test.

As agreed, the region selected the build no greater than 2002 interim emissions test in this year's conformity analysis. The conformity analysis indicates significant reductions in transportation emissions occurring by 2010 and beyond, creating a significant gap between the interim 2002 emissions budget and the estimated levels of transportation emissions. The magnitude of the gap is temporary since the interim test will be replaced by new emissions budgets once the PM_{2.5} SIP has been formally submitted to EPA and the new emissions budgets found adequate.

For any PM_{2.5} conformity analysis in the coming years of the interim period, MWAQC continues to urge TPB and the state air agencies to work together to determine which option is most appropriate for conformity analysis. For the current PM_{2.5} conformity cycle, we also supported the TPB proposed approach of emissions analysis and conformity determination only for direct PM_{2.5} and for precursor NO_x. If in the coming year, the state air agencies and/or EPA determine that other components, namely VOCs, SO₂, and/or ammonia contribute significantly to the fine particle problem in the Washington, DC region, those pollutants should be included in future conformity analyses.

Meeting the PM_{2.5} standard is expected to require continuation of all mobile and non-mobile emission reduction commitments, and possibly new ones in the near future. States and local governments are urged to maintain their commitments to TERMS and other emission reduction measures, regardless of whether implementation of these measures is currently critical for conformity determination during the interim period.

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 for attaining the new air quality standards and to integrate our new 8-hour and PM_{2.5} standard planning efforts.

Sincerely,

Hon. T. Dana Kauffman, Chair
Metropolitan Washington Air Quality Committee