

# **Metropolitan Washington Air Quality Committee**

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October 11, 2006

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

Dear Chair Knapp:

The Metropolitan Washington Air Quality Committee (MWAQC) has reviewed the September 20, 2006 draft *Air Quality Conformity Determination Of The 2006 Constrained Long Range Plan And The FY2007-2012 Transportation Improvement Program For The Washington Metropolitan Region*. We are pleased the proposed transportation plan meets the interim emissions tests for both the 8-hour ozone and PM<sub>2.5</sub> standards.

As allowed by EPA in the interim before 8-hour ozone and PM<sub>2.5</sub> 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<sub>2.5</sub>, 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 2005 CLRP and FY 2006-2011 TIP.

The conformity analysis indicates that substantial reductions in transportation emissions will occur by 2010 and in succeeding years, resulting in transportation emissions well below the maximum allowable emission levels. While this is a positive development, it is anticipated to be a temporary circumstance as the existing emission budgets (based on the old one-hour ozone SIP) are expected to be replaced by more stringent requirements using the new eight-hour ozone and small particle standards (PM<sub>2.5</sub>). These new emission budgets will be established in the new SIPs expected to be in place in 2007 and 2008.

We continue to urge States and local governments to maintain their commitments to TERMS and other emission reduction measures, regardless of whether implementation of these measures is currently necessary for conformity. Meeting the 8-hour ozone and PM<sub>2.5</sub> standards is expected to be a much more difficult effort, requiring continuation of all mobile and non-mobile emission reduction commitments, and possibly new ones in the near future.

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 8-hour ozone and PM<sub>2.5</sub> air quality standards.

Sincerely,



Hon. Phil Mendelson, Chair  
Metropolitan Washington Air Quality Committee