

DRAFT

Metropolitan Washington Air Quality Committee

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July 9, 2008

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 June 11, 2008 draft *Air Quality Conformity Determination Of The 2008 Constrained Long Range Plan And The FY2009-2014 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 2007 CLRP and FY 2008-2013 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. These reductions were taken into account when establishing new motor vehicle emission budgets.

We were pleased that conformity was also tested against the new proposed motor vehicle emission budgets in the 8-hour ozone and PM_{2.5} State Implementation Plans submitted to EPA in 2007 and 2008. According to representatives from EPA Region III, the public comment period for the new 8-hour ozone budgets ended on April 21, 2008, and may be approved as soon as August 2008.

As you're aware, EPA has recently lowered the National Ambient Air Quality Standard (NAAQS) for both 8-hour ozone and PM_{2.5}. State Implementation Plans to meet these new standards will be due to EPA in 2013. Additional emission reductions may be needed to meet these new more stringent standards. As such, 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.

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. David Snyder, Chair
Metropolitan Washington Air Quality Committee