



October 1, 2018

The Honorable Charles Allen, Chair
National Capital Region Transportation Planning Board
777 North Capitol Street, NE, Suite 300
Washington, D.C. 20002

Dear Chair Allen:

Thank you for providing an opportunity to comment on the air quality conformity analysis in the draft Visualize 2045 plan. MWAQC has reviewed the above analysis and concurs that the transportation sector emissions associated with the proposed transportation plans meet the motor vehicle emissions budgets (MVEBs) in the 2008 Ozone National Ambient Air Quality Standard Maintenance Plan.

However, the Visualize 2045 plan results in having to use Tier 2 transportation buffers for some of the future years, so MWAQC urges TPB to redouble efforts to reduce air pollution emissions from the transportation sector so that future mobile emission budgets remain within Tier 1 MVEBs to fully protect the health of our residents.

The Washington region has made significant progress in reducing emissions of ozone precursors such as, volatile organic compounds (VOC) and nitrogen oxides (NO_x) from both transportation and non-transportation sectors over the years. As a result, the region has been able to meet all but the 2015 ozone National Ambient Air Quality Standard (NAAQS). The region has met the 2008 ozone standard of 75 parts per billion (ppb) since 2014 and submitted a request in early 2018 to EPA to redesignate the area to attainment for the 2008 ozone standard along with a required demonstration to maintain compliance in the future (maintenance plan).

The Washington region developed two sets of MVEBs (Tier 1 and Tier 2) for VOC and NO_x as part of the maintenance plan for the 2008 ozone standard using EPA's latest MOVES2014a model. The Tier 1 MVEBs together with Tier 2 MVEBs, which included a conformity buffer, were developed for 2025 and beyond. These MVEBs replaced the previously used MVEBs, which were developed earlier using Mobile6.2 model based on the 1997 ozone NAAQS. EPA, on August 21, 2018, found these budgets were adequate for transportation conformity purposes.

MWAQC notes that the air quality conformity assessment shows that transportation emissions are below the Tier 1 MVEBs for most of the analysis period. However, transportation emissions are above the Tier 1 MVEBs for 2025 and 2030. Therefore, TPB had to use the Tier 2 MVEBs buffers for demonstrating conformity in those two years.

The Tier 2 MVEBs buffers were provided for in the 2008 ozone NAAQS maintenance plan to account for conditions where the conformity analysis is based on different data, models, or planning assumptions, including, but not limited to, updates to demographic, land use, or project-related assumptions, then were used to create the MVEBs in the maintenance plan. Nevertheless, MWAQC is concerned about the use of the Tier 2 MVEBs buffers and wishes to stress that the future transportation plans should account for air emissions so that future conformity analyses would not need to use Tier 2 MVEBs buffers.

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MWAQC notes that the draft Visualize 2045 plan document does not address the reliance on the Tier 2 buffers in 2025 and 2030. On pages 54 and 55, the Tier 1 MVEBs for NO_x and VOCs are not included and the budget is shown to reflect solely the Tier 2 buffer. Any acknowledgement of the Tier 1 MVEBs and why emissions are projected to be above the Tier 1 MVEBs should be addressed specifically in the primary document and not relegated only to an Appendix.

This is particularly important as the Washington region faces continuing challenges related to air quality. The region needs to attain the 2015 ozone standard of 70 ppb by August 2021. The draft data for the period 2016 through 2018 shows the region's design value for ozone at 72 ppb. Additionally, the region's design value has been above the current standard since 2016. Also, the region had its first Code Red air quality day this summer since 2012. Source apportionment modeling conducted separately by the United States Environmental Protection Agency and the Ozone Transport Commission has shown that on-road mobile sources are a primary driver of ozone formation in the region. This evidence shows that even though the region has made significant progress in reducing emissions, it needs to continue its efforts to further reduce emissions to meet the 2015 ozone NAAQS, in particular from on-road mobile sources.

MWAQC is working on the "What We Can Do" scenario project to identify local actions that will help the region both attain the above ozone standard and eliminate future unhealthy air days. We pledge to work with TPB to help our members implement new measures to further reduce air pollution. Since on-road emissions play a significant role in the overall ozone problem in this region, it is important that the transportation sector plays its role in resolving this problem.

MWAQC is encouraged to learn that the region is achieving reductions in per capita VMT, even with an increase in employment. However, due to population and job growth, the region is experiencing an increase in total VMT. Therefore, we urge TPB's continued investment in VMT and emission reduction strategies such as public transit, ride-sharing, pedestrian and bike infrastructure, other travel demand management strategies, and Transportation Emission Reduction Measures (TERMS) to reduce future growth in vehicle emissions.

Our local and state efforts in the Washington region may become even more important in the future if less stringent emission standards for light-duty motor vehicles for the model years 2021-2026 are enacted as proposed, especially since the region is experiencing an increase in the market share of light and heavy-duty trucks. If these standards are approved, there will be further increase in emissions of ozone precursors which would lead to even higher ozone levels in the region, resulting in more difficult emissions reduction efforts for the region in the future. MWAQC appreciates TPB joining MWAQC in requesting continuation of the existing light-duty vehicle emission standards.

Thank you again for the opportunity to comment on the draft conformity analysis in the Visualize 2045 plan.

Sincerely,



Hon. Hans Riemer
Chair, Metropolitan Washington Air Quality Committee