

Metropolitan Washington Air Quality Committee

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July 13, 2005

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

Dear Chair Mendelson:

Thank you for soliciting input on the scope of work for the Fine Particles (PM_{2.5}) Standards Supplemental Air Quality Conformity Assessment of the 2005 CLRP and the FY2006-2011 TIP. According to EPA guidance, the Washington region is required to conduct a conformity determination for direct emissions and precursors of fine particulate pollution (PM_{2.5}) by April 6, 2006 to avoid a conformity lapse. As proposed in TPB's scope of work, the TPB intends to complete the PM_{2.5} conformity determination as a supplement to the on-going work to assess conformity for the 8-hour ozone standard in October 2005.

EPA's Transportation Conformity Rule Amendments provide two options for conformity determination during the interim period prior to the SIPs development in the new PM_{2.5} non-attainment areas and the establishment of mobile budgets for PM_{2.5} pollution and its precursors. The two options are (1) build no greater than no-build, or (2) build no greater than 2002. The TPB proposes to use Option 2, the build no greater than 2002 budget test in this year's conformity analysis. We note that both options provide an interim test until the state air agencies develop mobile emissions budgets for PM_{2.5} and its precursor pollutants. For this year's analysis, we support the TPB's choice of interim method because it makes the best use of available resources and supports the budget concept. For any PM_{2.5} conformity analysis in the coming years of the interim period, MWAQC urges 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 support the TPB proposed approach of emissions analysis and conformity determination only for direct PM_{2.5} and for precursor NO_x. We are urging the TPB and the three state air agencies to work together to determine which of the other precursors of PM_{2.5} (VOCs, SO_x, ammonia etc.) contribute significantly for possible inclusion in the analysis for the next conformity cycle and beyond.

EPA is expected to release additional guidance on PM_{2.5} conformity. The proposed scope of work may change when this new additional guidance becomes available later this year. The MWAQC Technical Advisory Committee is available to work with TPB staff for making any needed changes in the work scope and to develop any other new inputs required to complete the analysis.

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 PM_{2.5} conformity assessment scope of work. We look forward to working closely with you on making further improvements to the region's air quality to meet the new PM_{2.5} standard.

Sincerely,

A handwritten signature in black ink, appearing to read "Dana Kauffman". The signature is fluid and cursive, with a long horizontal stroke at the end.

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