

DRAFT

Metropolitan Washington Air Quality Committee

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October 27, 2004

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

Dear Chair Zimmerman:

The Metropolitan Washington Council of Governments Air Quality Committee (MWAQC) has received the letter from Chairman Zimmerman of the National Capital Region Transportation Planning Board (TPB) dated September 15, 2004 and appreciates the opportunity to provide comments on 8-hour ozone standard conformity assessment scope of work.

In July EPA released its 8-hour ozone transportation conformity guidance, outlining options for areas like the Washington, DC-MD-VA nonattainment area that have existing mobile budgets for the one-hour ozone standard. The region is required to conduct an 8-hour conformity determination by June 15, 2005 or face a conformity lapse.

The Washington, DC-MD-VA nonattainment area for the 8-hour ozone standard is smaller than the area for the one-hour standard because Stafford County, Virginia is no longer included. TPB's preferred option for conducting the 8-hour conformity assessment is to use the existing one-hour mobile emissions budgets, keeping Stafford County in the budgets and in the mobile emissions estimates for all analysis years. MWAQC agrees with TPB to use the existing one-hour mobile budgets for the transitional 8-hour conformity. We agree that removing Stafford County from the analysis would be difficult considering resources and limited time required to complete the work.

MWAQC is pleased to note that TPB has begun the work of collecting the information needed to code the 2010 network to accommodate the new milestone year for the 8-hour analysis. It would have been preferable to perform the 1-hour and 8-hour conformity determinations concurrently. As currently planned, the TPB will first complete the 1-hour determination in November. Then, in January, TPB will complete the 8-hour conformity determination with a new analysis for 2010.

Thank you for the opportunity to comment on the 8-hour ozone 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 8-hour standard.

Sincerely,
Thomas Dernoga, Chair