

Metropolitan Washington Air Quality Committee

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April 11, 2007

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

Dear Chair Hudgins:

Thank you for soliciting input on the scope of work for the Air Quality Conformity Assessment: 2007 CLRP and the FY2008-2013 TIP. As proposed in TPB's scope of work, the TPB intends to complete the conformity determination for fine particulates, ozone, and carbon monoxide concurrently. As indicated in the draft scope of work, States expect to submit the 8-hour ozone SIP in June and the new mobile budgets for 8-hour ozone should be available for use by TPB in October, the expected completion date for the draft conformity determination. We understand that the determination will also reflect updates to the Travel Demand Model. The region's Cooperative Forecasts developed by the Planning Directors of the Metropolitan Development Policy Committee (MDPC) will also reflect recent land use, housing, and employment changes expected as a result of Department of Defense base realignments and closures in the region.

The determination for fine particulates will be based on guidance from EPA regarding demonstrating conformity during the interim period prior to development of SIP budgets. We support the use of the interim PM_{2.5} emissions test of "build no greater than 2002 baseline" because this is the approved interim method in the absence of approved budgets. Under the transportation conformity program, mobile source emissions of volatile organic compounds, SO_x, and/or ammonia are not required to be analyzed in PM_{2.5} transportation conformity determinations unless the EPA Regional Administrator or the Director of the State Air Agency has made a finding that such emissions from within the area are found to be a significant contributor to the PM_{2.5} nonattainment problem, and to date this has not occurred. The significance of these pollutants will be analyzed in the development of the PM_{2.5} Attainment Plan which is scheduled to be completed by April 2008.

Meeting the 8-hour ozone and PM_{2.5} standards 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 needed for conformity determinations.

Thank you for the opportunity to comment on the 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 standards.

Sincerely,

Nancy Floreen, Chair
Metropolitan Washington Air Quality Committee