

Metropolitan Washington Air Quality Committee

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DRAFT

July 10, 2013

Honorable Scott K. York, Chair
National Capital Region Transportation Planning Board
777 North Capitol Street, NE
Washington, D.C. 20002

Dear Chair York:

Thank you for providing an opportunity to the Metropolitan Washington Air Quality Committee (MWAQC) to comment on the amended Air Quality Conformity Update for the 2013 Constrained Long Range Plan (CLRP) and the FY2013-2018 Transportation Improvement Program (TIP). MWAQC has reviewed the draft amended Air Quality Conformity assessment and concurs that the transportation-sector emissions associated with the proposed transportation plans meet the approved motor vehicle emissions budgets (MVEBs) for the old 1997 8-hour ozone standard (84 ppb), in addition to meeting the approved motor vehicle emissions budgets for the carbon monoxide standard, the interim base year 2002 emissions tests for the annual fine particulate matter (PM_{2.5}) standard, as well as the PM_{2.5} and precursor NO_x motor vehicle emissions budgets that were recently submitted to the EPA but have not yet been approved.

As noted in our March 15, 2013 comment letter to the National Capital Region Transportation Planning Board (TPB), the region is now working toward meeting a new more stringent 2008 ozone standard of 75 ppb, for which the region is designated as marginal nonattainment. The recently adopted 2014 work program for MWAQC includes a new work task to prepare a Reasonable Further Progress (RFP) plan to meet the 2008 ozone standard as expeditiously as practicable. MWAQC will need the support and consultation with TPB to examine emissions from the transportation sector and to identify new cost-effective strategies and opportunities to reduce emissions. MWAQC notes that while the deadline for meeting this 75 ppb standard is 2015, compliance with the standard will be based on air pollution levels beginning in the 2013 ozone season.

Note also that EPA has initiated a process to review the new 2008 ozone standard and may propose in the next year to make it even more stringent. Ambient data from the region's air quality monitors shows 8-hour ozone design value concentrations are now at 87 ppb. With current air quality levels significantly above the 2008 ozone standard, the region continues to face a challenge in meeting new lower clean air standards. Continued progress is therefore needed to reduce emissions across all sectors to achieve lower ozone concentrations.

MWAQC is encouraged to learn that the region is actually achieving reductions in VMT/capita, and that in recent years VMT has not been increasing even with an increase in population and employment. We urge TPB's continued investment in public transit, ride-sharing, and transit-oriented development to continue to mitigate future growth in vehicle emissions.

MWAQC also continues to emphasize the need for new federal emission control programs such as Tier 3 to reduce emissions from future fleets. Further, we strongly urge TPB to maintain its commitments to Transportation Emission Reduction Measures and other emission reduction measures. All of these efforts are essential to meet the 2008 ozone standard and potentially more stringent ozone and fine particle standards expected in the future.

Thank you again for the opportunity to comment on the draft conformity analysis.

Sincerely,

Hon. Leta Mach, Chair
Metropolitan Washington Air Quality Committee