

**\*\*\* MWAQC REVIEW DRAFT -- DO NOT CITE OR QUOTE \*\*\***

# **Metropolitan Washington Air Quality Committee**

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October 12, 2005

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

Dear Chair Mendelson:

The Metropolitan Washington Air Quality Committee (MWAQC) has reviewed the September 15, 2005 draft *Air Quality Conformity Determination Of The 2005 Constrained Long Range Plan And The FY2006-2011 Transportation Improvement Program For The Washington Metropolitan Region*. We are pleased the proposed transportation plan meets the interim mobile emissions budgets based on the recently approved 1-hour ozone plan.

As allowed by EPA in the interim before 8-hour mobile budgets are developed and approved, conformity for the 8-hour ozone standard is being tested against the 1-hour ozone mobile budgets in the region's approved SIP. We note that this analysis uses the same approach as the conformity determination for the 2004 CLRP and FY 2005-2010 TIP, except that several new inputs such as seasonal adjustment factors were developed and incorporated into the analysis.

The conformity analysis indicates significant reductions in transportation emissions occurring by 2010 and beyond, creating a significant gap between the emissions budget and the estimated levels of transportation emissions. We note again that the gap is temporary since the existing, 1-hour standard-based emissions budgets will soon be replaced by new emissions budgets for the 8-hour ozone standard corresponding to year 2009.

We continue to urge States and local governments to maintain their commitments to TERMS and other emission reduction measures, regardless of whether implementation of these measures is currently necessary for conformity. Meeting the 8-hour ozone standard is expected to be a much more difficult effort, requiring continuation of all mobile and non-mobile emission reduction commitments, and possibly new ones in the near future.

Thank you for the opportunity to comment on the draft conformity analysis. We look forward to working closely with you on making further improvements to the region's air quality for attaining the new air quality standards and to integrate our new 8-hour and PM<sub>2.5</sub> standard planning efforts.

Sincerely,

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