



ENVIRONMENTAL DEFENSE

finding the ways that work
1875 Connecticut Avenue NW
Washington, DC 20009

December 13, 2004

Chairman Chris Zimmerman
Chair, Transportation Planning Board
Metropolitan Washington Council of Governments
777 North Capitol Street, N.E., Suite 300
Washington, DC 20002-4290

Thomas E. Dernoga
Chair, Metropolitan Washington
Air Quality Committee
777 N. Capitol Street, N.E., #300
Washington, DC 20002-4290

RE: New Federally-Supported Peer Review Panel Findings Call for Timely Reforms to Address Accounting Improprieties in TPB Travel Model Treatment of Job-Housing Balance

Dear Chairman Zimmerman and Chairman Dernoga:

I am writing on behalf of the thousands of members of Environmental Defense in the metropolitan Washington region. We are concerned that flaws in TPB's accounting for job and housing growth and in-commuting to the Washington metro area will undermine the integrity of the MWAQC's air pollution emission inventory and forecasts used to prepare 8-hour ozone State Implementation Plans (SIPs), as well as TPB's estimates of air pollution for the impending 8-hour ozone transportation conformity analysis.

This has the potential to delay needed reductions in air pollution and to lead to false optimism that the region's air quality problems are unaffected by transportation and land use decisions made this year and in coming years. It hides adverse side effects of local and regional land use policies that fail to allow or encourage enough new housing in proportion to permitted commercial development, exacerbating traffic growth contrary to TPB's adopted long range plan policy goal of reducing vehicle miles of travel per capita. This in turn contributes to worse congestion, pollution, and housing affordability problems.

While TPB and MWAQC last month dismissed our concerns¹ in the press to adopt a new Constrained Long Range Transportation Plan, since that time, just-released findings of a federally sponsored expert travel model peer review panel raise the same concerns in unequivocal terms. Good stewardship and sound administration under the law demands that TPB and MWAQC take timely steps to correct these accounting irregularities as the region moves towards adopting new air quality and transportation plans to comply with the revised federal air quality standards and other planning and project review requirements.

¹ Transportation Planning Board, Item 13- Action, November 17, 2004, *Review of Comments Received and Acceptance of Recommended Responses for Inclusion in the Air Quality Conformity Assessment, the 2004 Constrained Long Range Plan (CLRP), and FY 2005-2010 Transportation Improvement Program.*

The FHWA Travel Model Improvement Program (TMIP) expert panel commissioned by the Baltimore Metropolitan Council (BMC) calls into question current accounting practices concerning job-housing balance in both the Washington and Baltimore regional travel models and recommends action to fix this problem. The Peer Review Panel noted, “the close proximity of the Baltimore and Washington, DC metropolitan areas has significant implications for the Baltimore model,” and called special attention to population and employment forecasting as an area needing improvement, offering the following recommendations²:

- ***Establish an independent process to develop regional employment control details.*** *There were significant concerns regarding the population and employment forecasting procedures, in particular the fact that there are no employment control totals for the Baltimore-Washington Region. Employment and job projections need to be addressed by both Baltimore and Washington, DC planning agencies because the projected labor pool in the combined regions cannot possibly fill the projected number of new jobs. Both agencies project new jobs that far outstrip the number of individuals in the labor pool [emphasis added]...The regional control totals are particularly important due to the expected increase in interaction between the two regions in the future.*
- ***A better approach would be to develop statewide and regional totals (for the BMC region plus Prince George, Montgomery, and Frederick Counties).***
- ***The best approach would be to develop related and consistent population and employment controls for the combined areas of the BMC and the Washington COG regions. Other regions have successfully used a range of techniques—including substantive cooperative forecasting, expert-panel input, and statistical models—to explore likely future development patterns and forecast alternatives.***

These concerns echo previous letters and comments we have made to the TPB about the failure to “balance the books” on projected job and housing growth relative to the forecast number of in-commuters. As we have noted, the TPB travel model balances regional trip productions to match regional trip attractions. While in the base year, this produces little difference, in MWCOG’s future land use forecasts, job growth is forecast to far outpace growth in households and the number of resident workers. It is a common and sound accounting practice in comparing alternative transportation investments to “balance” the number of jobs created with the number of trips generated by the number of resident workers and customers living in or imported to or exported from the modeled region. This balancing of jobs, resident workers, and external trips is important to avoid artificially making some scenarios or projects appear to perform better than others on the basis of arbitrary and capricious internally inconsistent assumptions that would be impossible to reconcile in the real world.

TPB’s model accounting does not properly account for the travel due to projected job growth by adding sufficient new households or increased in-commuting to ensure enough workers to fill all the jobs. There has been no change to the assumed travel model inputs to reflect the 2030 forecast traffic entering and leaving the region at the boundaries of the model - not for work

² U.S. Department of Transportation, Travel Model Improvement Program, December 2004, *Report on the Findings of the First Peer Review Panel of the Baltimore Metropolitan Council*, http://tmip.fhwa.dot.gov/services/peer_review_program/documents/bmc/ (12/10/04) page 11.

trips, other trips, shopping trips, or non-home-based trips - since sometime before Version 2.1C#16 using Round 6.3 land use inputs, in spring 2004.

After 65,609 new jobs were added to the regional Round 6.4A cooperative forecast this summer in response to the proposed addition of the Intercounty Connector to the regional transportation plan, Ron Kirby, TPB Planning Director, stated at the September TPB meeting that the workers at these jobs would commute in from outside the region. But two months later, at the November 17, 2004 TPB meeting, Mr. Kirby admitted that the traffic model essentially would not add these new jobs but rather take them from elsewhere within the region and redistribute them. As he noted then, "we're consistent with past practice in this. Whether we're correct in this method is open to debate."

It calls into question the integrity and legal defensibility of the process when TPB member agencies tout job creation benefits for projects like the Intercounty Connector in public debate while manipulating the model inputs in ways that would pretend there are no traffic or emissions impacts from these jobs in the planning and environmental review process. TPB and MWAQC must do better at informing themselves, area officials, and the public about the implications of alternative investment and land use policies if public trust is to be sustained and public health protected.

For decades, the Washington, DC-region has been designated as a non-attainment area under the National Ambient Air Quality Standards (NAAQS) for ozone—which is formed from hydrocarbons and nitrogen oxides—and carbon monoxide. While the area is now classified as a maintenance area for carbon monoxide, it has repeatedly missed deadlines for cleaning up ozone smog pollution. Most recently, the metro area failed to meet its 1999 attainment deadline for ozone and was thus, reclassified as a "severe" non-attainment area under the 1-hour ozone NAAQS. In April 2004, the area was classified as non-attainment for the new, more stringent 8-hour ozone standard. It is expected that the metro area will also be designated non-attainment for the new fine particulate matter (PM_{2.5}) in early 2005.³ Attainment of PM_{2.5} will likely require significant new controls on motor vehicle VOC and NO_x emissions, both of which are contributors to the particulate problem.

A recent report from the EPA Inspector General points to the Washington region's shortcomings in meeting these rate-of-progress measures in pollution reduction targets as a key reason why it and most other seriously polluted metro areas are making little progress in cleaning up health-threatening air pollution. The new EPA report suggests that overestimates of emission reductions from 1-hour controls and failure to use accurate data, assumptions, and projections of emission growth resulted in failure of air quality control plans in Washington and elsewhere. The report noted that, "recent downward trends in ozone may be more related to changes in weather patterns than emission reductions."⁴

While new Tier II motor vehicle tailpipe standards and cleaner fuel will contribute significantly to future pollution reductions, it will be very challenging for the Washington region to attain the

³ Letter to Donald Welsh, USEPA Region 3 Administrator, from D.C. Mayor Anthony Williams, February 13, 2004. Available at www.epa.gov/pmdesignations/documents/04Recommendations/3/s/Washington_D.C..pdf

⁴ U.S. Environmental Protection Agency, Office of Inspector General, *EPA and States Not Making Sufficient Progress in Reducing Ozone Precursor Emissions in Some Major Metropolitan Areas*, September 29, 2004.

new, more rigorous 8-hour ozone standard. The Washington region is required to submit a new air quality attainment plan to EPA in April 2007, and the region is required to meet the new standard in 2010. It may well take further emission reductions of 70 percent or more in ozone precursors and further reductions in particulate matter from motor vehicles to ensure healthful air for the region's residents. Mobile sources will be expected to contribute along with stationary sources to this reduction.

The history of Clean Air Act implementation shows that time after time, the Washington region and other areas have overconfidently assumed technology fixes would take care of the problem, causing repeatedly missed deadlines and producing serious health problems for millions of people. We should not compound this error by ignoring the deficiencies of the transportation modeling assumptions about job-housing balance.

Given the problems with the traffic model described above as well as with the implementation and enforcement of the Clean Air Act, we strongly urge the TPB and MWAQC to implement quickly the recommendations in the Baltimore peer review TMIP report. We also strongly recommend that the TPB allow for additional independent auditing of the travel model to expose and correct the substantial problems - documented by us as well as by the National Academy of Sciences Transportation Research Board - which continue to plague the model.

Papering over these problems is the answer. New SIP inventories and conformity analysis should account for these problems. By making these changes, the TPB will be in a better position to protect the air quality and quality of life for the millions of residents of and visitors to the Washington, DC region.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Replogle", is written over a thin vertical red line.

Michael Replogle
Transportation Director
Environmental Defense

cc: Margo Oge, Director, Office of Transportation and Air Quality, US EPA
Cynthia Burbank, Associate Administrator for Planning, FHWA
D.J. Gribben, Chief Counsel, FHWA
Mayor Anthony Williams, District of Columbia
Governor Mark R. Warner, Virginia
Governor Robert L. Ehrlich, Jr., Maryland