

Metropolitan Washington Air Quality Committee

Suite 300, 777 North Capitol Street, N.E. Washington, D.C. 20002-4239 202-962-3358 Fax: 202-962-3203

October 2, 2014

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

Dear Chair Wojahn:

Thank you for providing an opportunity to the Metropolitan Washington Air Quality Committee (MWAQC) to comment on the 2014 Constrained Long Range Plan (CLRP) and the FY2015-2020 Transportation Improvement Program (TIP). MWAQC has reviewed the draft 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), motor vehicle emissions budgets (MVEBs) found adequate for the 1997 annual fine particulate matter (PM_{2.5}) standard, and the approved motor vehicle emission budget for the carbon monoxide standard.

The Washington region is currently 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 2015 work program for MWAQC includes a number of tasks to meet the 2008 ozone standard by 2015. 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 during the period 2013 through 2015. 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 in order to meet the above goal.

The Washington region committed in its PM_{2.5} Maintenance Plan submitted in May 2013 to EPA to update the onroad mobile budgets for PM_{2.5} and NO_x using the latest models by the end of 2015. EPA released a new version of the MOVES model called MOVES2014 in July 2014. This model includes the recently published Tier 3 rule as well as two greenhouse gas rules for motor vehicles. MWAQC would like to work with TPB to update the annual PM_{2.5} and NO_x onroad mobile budgets described in the above plan using the MOVES2014 model and the most current version of TPB's Travel Demand Model.

MWAQC also notes that EPA is scheduled to propose a revised and potentially tougher ozone standard likely somewhere in the range of 60-70 ppb in December 2014 and is expected to finalize it October 2015. Draft ambient data from the region's air quality monitors shows the design value for the 2008 8-hour ozone standard is now at 76 ppb. Therefore, even though the ozone levels have been declining over the years, the region still needs to keep working towards meeting the 2008 ozone standard by the end of 2015. While recently adopted Tier 3 program will provide significant benefits in the long-term

for the expected potentially tougher air quality standards, continued progress towards reducing emissions across all emissions sectors is needed to meet the above goal.

MWAQC is encouraged to learn that the region is actually achieving reductions in VMT/capita even with an increase in 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 strongly urges 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. Dave Snyder, Chair
Metropolitan Washington Air Quality Committee