



April 13, 2022

The Honorable Pamela Sebesky, Chair
National Capital Region Transportation Planning Board
777 North Capitol Street, NE, Suite 300
Washington, D.C. 20002

Dear Chair Sebesky:

Thank you for providing an opportunity to comment on the draft air quality conformity analysis for the 2022 amendment to the Visualize 2045 plan. MWAQC has reviewed the above analysis and concurs that the transportation sector emissions associated with the proposed transportation plans meet the motor vehicle emissions budgets (MVEBs) in the 2008 Ozone National Ambient Air Quality Standard (NAAQS) Maintenance Plan.

However, the 2022 amendment to the Visualize 2045 plan continues to require the use of Tier 2 transportation buffers for 2025 and 2030. Therefore, TPB had to use the Tier 2 MVEBs buffers for demonstrating conformity in those two years. MWAQC urges TPB and its members to give particular focus to projects that would reduce air pollution emissions from the transportation sector so that future mobile emission budgets remain within Tier 1 MVEBs to fully protect the health of our residents.

The draft Design Value data for ozone for the Washington region for the period 2019 through 2021 is 70 ppb parts per billion (ppb). This shows that the region is barely in compliance with the 2015 ozone NAAQS despite the low 2020 data resulting from pandemic related restrictions. Therefore, the region needs to continue reducing its emissions to maintain this compliance in the future. The base year 2017 emissions inventory for the region submitted to EPA in 2020 shows onroad sources to be the greatest contributor (39%) of NOx emission in the region. Therefore, it is essential that the region reduce its emissions further in order to keep complying with the 2015 ozone NAAQS from all sources, including on-road mobile sources.

MWAQC notes that the region also is experiencing an increase in total VMT along with an increase in population and job growth. Therefore, we urge TPB's continued investment in VMT and emission reduction strategies such as public transit, ride-sharing, pedestrian and bike infrastructure, other travel demand management strategies, and Transportation Emission Reduction Measures (TERMS) to reduce future growth in vehicle emissions.

Thank you again for the opportunity to comment on the draft conformity analysis for the 2022 amendment to the Visualize 2045 plan.

Sincerely,

Hon. Takis Karantonis
Chair, Metropolitan Washington Air Quality Committee