



September 15, 2004

*District of Columbia  
Bowie  
College Park  
Frederick County  
Gaithersburg  
Greenbelt  
Montgomery County  
Prince George's County  
Rockville  
Takoma Park  
Alexandria  
Arlington County  
Fairfax  
Fairfax County  
Falls Church  
Loudoun County  
Manassas  
Manassas Park  
Prince William County*

The Honorable Thomas Dernoga  
Chairman  
Metropolitan Washington Air Quality Committee (MWAQC)  
Metropolitan Washington Council of Governments  
777 N. Capitol Street, N.E.  
Washington, D.C. 20002

Dear Mr. Dernoga:

As you are aware, the final rule regarding air quality conformity requirements for the 8-hour ozone standard was published in the July 1, 2004 Federal Register. These new regulations affect the air quality conformity planning responsibilities of the National Capital Region Transportation Planning Board (TPB). Specifically, the TPB must demonstrate that its plans and programs adhere to conformity requirements with respect to the new standards by June 15, 2005 or face a conformity lapse. These requirements include the use of an interim emissions budget test for milestone analysis years, including 2010, the new attainment date for the 8-hour standard.

For the Washington, DC-MD-VA nonattainment area, the 8-hour nonattainment boundary is smaller than the 1-hour boundary, since Stafford County has been removed from the Washington nonattainment area for the 8-hour standard. In these circumstances, EPA's conformity rule provides two options for conducting a conformity analysis prior to the setting of new mobile budgets under the 8-hour standard: use of revised 1-hour budgets, removing Stafford County emissions from the 1-hour budgets and mobile emissions estimates (option 1); or use of the existing 1-hour budgets, retaining Stafford County in both the budgets and mobile emissions estimates (option 2).

In response to EPA's new requirements, the TPB has prepared two items for public comment and interagency consultation:

1. A scope of work for performing the 8-hour conformity assessment (see Enclosure 1. 8-Hour Ozone Standard Conformity Assessment, Scope Of Work), and
2. A listing of 2010 project elements (see Enclosure 2. 2004 CLRP and FY2005-2010 TIP Air Quality Conformity Inputs).

As noted in the work scope, TPB recommends use of the existing MWAQC 1-hour budgets, retaining Stafford County in both the budgets and emissions estimates (option 2). These 1-hour budgets are associated with the results of MWAQC's latest nonattainment planning for the Washington region as a severe nonattainment area under the 1-hour standard. As the budget levels include Stafford County, the second fastest growing county in the region, the option 2 budget comparison test represents the more stringent of the two tests, consistent with the latest technical methods applied in developing the region's emissions picture. Use of these 1-hour budget levels would also

enable the analysis to be accomplished in less calendar time, which is important to the region given the one year time frame for completing the analysis, including all federal approvals, by June 15, 2005.

The TPB is currently undertaking a conformity assessment using the 1-hour ozone and winter carbon monoxide criteria for the 2004 CLRP and FY2005-2010 TIP, with a draft report scheduled for October 1, 2004 and TPB action scheduled for November 17, 2004. The proposed 8-hour work scope is a supplement to the ongoing 1-hour conformity analysis. As noted in the work scope schedule, the supplemental analysis is to be undertaken immediately following the 1-hour analysis, with a draft report scheduled for December 15, 2004 and TPB action on January 19, 2005. This schedule is designed to permit the TPB and subsequent federal approvals to occur well in advance of the June 15, 2005 deadline, so that the region may avoid a conformity lapse.

The TPB would appreciate MWAQC's review and comment on the enclosed scope of work and listing of 2010 project elements. The TPB looks forward to a continuing close working relationship with MWAQC in meeting these important conformity requirements related to the 8-hour ozone standard.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Christopher Zimmerman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Christopher Zimmerman  
Chairman  
National Capital Region Transportation Planning Board

Enclosures (2)