

Metropolitan Washington Air Quality Committee

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TAC REVIEW DRAFT #2 DRAFT DO NOT CITE OR QUOTE

November 10, 2010

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

Dear Chair Snyder:

The Metropolitan Washington Air Quality Committee (MWAQC) has reviewed the October 20, 2010 Draft Air Quality Conformity Assessment for the 2010 CLRP and FY 2011-2016 TIP. The analysis demonstrates the proposed transportation plan meets both the interim emissions tests for the PM_{2.5} annual standard and the approved motor vehicle emissions budgets for both the 1-hour and 8-hour ozone standards as well as the most recent proposed motor vehicle emission budgets for those standards.

Conformity for the 8-hour ozone standard is being tested against the 1-hour ozone mobile budgets as well as the 2008 8-hour ozone reasonable further progress (RFP) mobile budgets contained in the region's approved SIP. The 2008 Reasonable Further Progress (RFP) motor vehicle budget became effective on September 21, 2009. For PM_{2.5}, the revised air quality conformity analyses for the 2010 CLRP/FY2011-2016 TIP passes the build no greater than 2002 interim emissions test the region had previously selected. We commend the National Capital Region Transportation Planning Board (TPB) for its contribution to clean air through compliance with the proposed motor vehicle emissions budgets in the 8-hour ozone SIP and the annual PM_{2.5} SIP submitted to EPA in 2007 and 2008. This commitment is vital to the region's progress toward attainment and maintenance of these standards.

MWAQC realizes there will be substantial reductions in transportation emissions occurring by 2030 that result in transportation emissions well below the current maximum allowable emission levels. MWAQC notes that this analysis now includes a new out-year milestone year (2040) and that VOC and PM_{2.5} emissions between 2030 and 2040 actually show a slight increase. This occurs because by 2016, federally mandated emission control programs will have fully penetrated the fleet and achieved their maximum benefit, and the ultimate increase in emissions reflects growth in the region overtaking the effects of our current control programs. Through the Ozone Transport Commission, Maryland, Virginia and the District of Columbia are pressing EPA for new federal emission control programs to provide new approaches to reducing emissions in our future fleets. MWAQC also supports the need for new federal emission control programs and encourages continued investment in public transit, ride-sharing and transit oriented development to enhance and expand such systems and programs to reduce future growth in single occupant vehicular trips and vehicle miles traveled.

As you are aware, the EPA recently promulgated more stringent National Ambient Air Quality Standards (NAAQS) for both 8-hour ozone and daily PM_{2.5}. EPA is now considering whether to

further tighten the ozone NAAQS and has released a new motor vehicle emission model that could substantially affect emission estimates in the region even if there are no changes to the transportation network. When the region is designated as a nonattainment area under these new standards, State Implementation Plans will be due to EPA three years later. Additional emission reductions will be needed across all sectors to meet these new more stringent standards. We continue to strongly urge state and local governments to maintain their commitments to Transportation Emission Reduction Measures (TERMs) and other emission reduction measures to advance meeting the new ozone and particulate matter standards as soon as possible.

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.

Sincerely,

Hon. Leta Mach, Chair
Metropolitan Washington Air Quality Committee