

Metropolitan Washington Air Quality Committee

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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 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. The analysis also demonstrates conformance to the most recent proposed motor vehicle emission budgets for the PM_{2.5} annual and 8-hour ozone standards even though these budgets are not yet applicable.

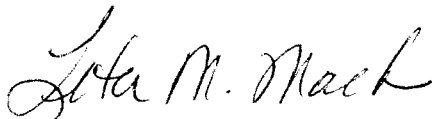
Conformity of the estimated emissions from the 2010 CLRP/FY2011-2016 TIP is being tested for the 8-hour ozone standard against the 1-hour ozone mobile budgets as well as the 2008 8-hour ozone reasonable further progress (RFP) mobile budgets contained in the region's approved SIPs. The 2008 Reasonable Further Progress (RFP) motor vehicle budget became effective on September 21, 2009. For PM_{2.5}, the conformity analysis 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 attainment budgets in the 8-hour ozone SIP and the annual PM_{2.5} SIP submitted to EPA in 2007 and 2008. This commitment is consistent with the region's air quality attainment plan and 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 the conformity 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 2030, federally mandated vehicle 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 urging 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 is now considering whether to further tighten the recently promulgated more stringent National Ambient Air Quality Standards (NAAQS) for 8-hour ozone. When the region is designated as a nonattainment area under this tighter new standard, additional emission reductions will be needed across all sectors to meet this new more stringent standard. A new State Implementation Plan will be due to EPA three years after the nonattainment designation is finalized. Additionally the EPA has recently 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 and/or actual emissions. All of these anticipated actions emphasize the need for planning to reduce future emissions in the region. 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 tighter 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,

A handwritten signature in black ink that reads "Leta M. Mack". The signature is written in a cursive, flowing style.

Hon. Leta Mach, Chair
Metropolitan Washington Air Quality Committee