

Metropolitan Washington Air Quality Committee

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DRAFT

September 23, 2009

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

Dear Chair Jenkins:

The Metropolitan Washington Air Quality Committee (MWAQC) has reviewed the September 16, 2009 Draft Air Quality Conformity Assessment for An Amendment to the 2009 CLRP and FY 2010-2015 TIP to Include the Purple Line Light Rail Project and the Transportation Components Associated with the "Return to L'Enfant" Development over I-395. We are pleased the proposed transportation plan meets both the interim emissions tests and the proposed new motor vehicle emissions budgets for the PM_{2.5} standards, as well as the new 2008 Reasonable Further Progress (RFP) ozone motor vehicle budget which became effective on September 21, 2009.

As allowed by EPA in the interim before the 2009/2010 8-hour ozone and PM_{2.5} mobile budgets are developed and approved, 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 in the region's SIP. We understand that the 8-hour ozone budgets have been submitted to EPA, but only the 2008 Reasonable Further Progress (RFP) budget has been deemed adequate for use in conformity. We are pleased that the region adheres to the 2009 attainment budget, even though it is not yet a requirement. For PM_{2.5}, the revised air quality conformity analyses for the 2009 CLRP/FY 2010-2015 TIP passes the build no greater than 2002 interim emissions test the region had previously selected, as well as the new proposed motor vehicle emission budgets proposed in the region's PM_{2.5} SIP.

We note that this analysis is for an amendment to the regional transportation plan that includes three new projects, including the Purple Line transit rail project in Maryland. We are pleased that the analysis shows that the addition of this project will result in an overall increase in transit ridership and a decrease in Vehicle Miles Traveled. MWAQC supports continued investment in transit to assist the region to meet our air quality improvement and greenhouse gas reduction goals.

For future years, we acknowledge the expectation that there will be substantial reductions in transportation emissions occurring by 2020 and in succeeding years, resulting in transportation emissions well below the current maximum allowable emission levels. However, as you're aware, the EPA recently promulgated more stringent National Ambient Air Quality Standard (NAAQS) for both 8-hour ozone and PM_{2.5}. EPA is also now considering whether to further tighten the ozone NAAQS and may release 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. If the region is designated as a nonattainment area under these new standards, State Implementation Plans will be due to EPA in 2013. Additional emission reductions will very likely 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. Phil Mendelson, Chair
Metropolitan Washington Air Quality Committee