

Metropolitan Washington Air Quality Committee

Suite 300, 777 North Capitol Street, N.E. Washington, D.C. 20002-4239 202-962-3358 Fax: 202-962-3203

November 5, 2008

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

Dear Chair Mendelson:

The Metropolitan Washington Air Quality Committee (MWAQC) has reviewed the October 8, 2008 draft *Air Quality Conformity Determination Of The 2008 Constrained Long Range Plan And The FY2009-2014 Transportation Improvement Program For The Washington Metropolitan Region*. We are pleased the proposed transportation plan meets both the interim emissions tests and the proposed new motor vehicle emissions budgets for both the 8-hour ozone and PM_{2.5} standards.

As allowed by EPA in the interim before 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 in the region's approved SIP. For PM_{2.5}, the region selected the build no greater than 2002 interim emissions test in this year's conformity analysis. We note that this analysis uses the same approach as the conformity determination for the 2007 CLRP and FY 2008-2013 TIP. The conformity analysis indicates that substantial reductions in transportation emissions will occur by 2010 and in succeeding years, resulting in transportation emissions well below the maximum allowable emission levels. These reductions were taken into account when establishing new motor vehicle emission budgets. We were pleased that conformity was also tested against the new proposed motor vehicle emission budgets in the 8-hour ozone and PM_{2.5} State Implementation Plans submitted to EPA in 2007 and 2008, respectively.

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}. 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 to meet these new more stringent standards. For that reason and other reasons, we continue to strongly urge States 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. David Snyder, Chair
Metropolitan Washington Air Quality Committee