



October 11, 2017

Honorable Bridget Donnell Newton, Chair
National Capital Region Transportation Planning Board
777 North Capitol Street, NE, Suite 300
Washington, D.C. 20002

Dear Chair Newton:

Thank you for providing an opportunity to the Metropolitan Washington Air Quality Committee (MWAQC) to comment on the draft amended 2016 Constrained Long Range Plan (CLRP) and the FY2017-2022 Transportation Improvement Program (TIP). MWAQC has reviewed the draft Air Quality Conformity assessment and concurs that the transportation sector emissions associated with the proposed transportation plans meet the motor vehicle emissions budgets (MVEBs) approved for the 1997 8-hour ozone national ambient air quality standard (NAAQS).

The Washington region has made significant progress in reducing emissions of ozone precursors such as, volatile organic compounds (VOC) and nitrogen oxides (NO_x) from both transportation and non-transportation sectors over the years. As a result, the region met the 2008 ozone standard of 75 parts per billion (ppb) based on the data for the period 2012 through 2014. The region is currently in the final stages of developing a request for EPA to redesignate the area to attainment for the 2008 ozone standard along with a required demonstration to maintain compliance in the future (maintenance plan).

The Washington region developed a draft set of MVEBs for VOC and NO_x as part of the maintenance plan for the 2008 ozone standard using EPA's latest MOVES2014a model. These MVEBs will replace the currently used MVEBs, which were developed earlier using Mobile6.2 model. The MOVES2014a model includes the recently published Tier 3 vehicle emission and fuel standards rule as well as two greenhouse gas rules for motor vehicles.

However, MWAQC also notes that EPA published a revised and tougher health based ozone standard of 70 ppb in October 2015. The draft data for the period 2015 through 2017 shows the region's design value for ozone at 72 ppb. This indicates that even though the region has made significant progress in reducing emissions, it needs to continue its efforts in order to meet the 2015 ozone standard. While the recently adopted Tier 3 program will provide significant emissions reduction benefits from the transportation sector, MWAQC will need the support and cooperation of TPB to examine emissions and to identify new cost-effective strategies and opportunities to reduce on-road mobile emissions further in order to continue progress towards meeting the ozone standard. This is important as EPA recently proposed to reconsider the final determination of the mid-term evaluation of the greenhouse gas (GHG) standards for the light-duty motor vehicles for the model years 2022-2025. In this respect, MWAQC very much appreciates TPB's stand to maintain the existing GHG emission standards promulgated in 2012, which could also help in reducing emissions of ozone precursors namely, volatile organic compounds (VOCs) and nitrogen oxides (NO_x).

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MWAQC is encouraged to learn that the region is actually achieving reductions in per capita vehicle miles travelled (VMT), even with an increase in employment. However, the region is experiencing an increase in total VMT as the population grows. Therefore, we urge TPB's continued investment in VMT and emission reduction strategies such as public transit, including all needed investments in Metro, ride-sharing, pedestrian and bike infrastructure, and other travel demand management strategies to continue to mitigate future growth in vehicle emissions. MWAQC strongly urges TPB to maintain its commitments to Transportation Emission Reduction Measures and other emission reduction measures. All of these efforts are essential to meet the 2015 ozone standard.

Thank you again for the opportunity to comment on the draft conformity analysis.

Sincerely,

Hon. Hans Reimer
Chair, Metropolitan Washington Air Quality Committee