

Metropolitan Washington Air Quality Committee

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March 15, 2013

Honorable Scott K. York, Chair
National Capital Region Transportation Planning Board
777 North Capitol Street, NE
Washington, D.C. 20002

Dear Chair York:

Thank you for providing an opportunity to the Metropolitan Washington Air Quality Committee (MWAQC) to comment on the amended Air Quality Conformity Update for the 2012 Constrained Long Range Plan (CLRP) and the FY2013-2018 Transportation Improvement Program (TIP). MWAQC understands that this amendment is being done to include the 2009 attainment plan and the 2010 contingency plan mobile budgets in the updated 2012 CLRP & FY2013-2018 TIP. These mobile budgets were part of the State Implementation Plan (SIP) for the Washington DC-MD-VA nonattainment region for the old 1997 8-hour ozone standard of 84 parts per billion (ppb), which was submitted as part of the Attainment Plan in 2007. The above mobile budgets for Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) were found to be adequate by the U.S. Environmental Protection Agency (EPA) for transportation conformity purposes on Feb 7, 2013 for the purposes of meeting the 1997 8-hour ozone standard.

MWAQC has reviewed the draft amended Air Quality Conformity assessment and concurs that the transportation-sector emissions associated with the proposed transportation plans meet the approved motor vehicle emissions budgets (MVEBs) for the old 1997 8-hour ozone standard (84 ppb), in addition to meeting the approved motor vehicle emissions budgets for the carbon monoxide standard and the interim base year 2002 emissions tests for the annual fine particulate matter (PM_{2.5}) standard. However, it should be noted that even the new budgets that were recently approved by EPA are several years old and don't reflect levels of emissions required to achieve the new lower ozone standard.

The region is now working toward meeting a new more stringent 2008 ozone standard of 75 ppb, for which the region is designated as marginal nonattainment. The deadline for meeting this 75 ppb standard is 2015. Moreover, EPA has initiated a process to review the new 2008 ozone standard and may propose in the next year to make it even more stringent. Ambient data from the region's air quality monitors shows 8-hour ozone design value concentrations are now at 87 ppb. With current air quality levels significantly above the 2008 ozone standard, the region faces a challenge in meeting new lower clean air standards. The region should continue to make progress to reduce emissions across all sectors to achieve lower ozone concentrations, in order to meet an attainment deadline of 2015 (with compliance determined based on air quality readings for the summers of 2013 through 2015), as required for areas designated as marginal nonattainment.

As noted in our December 5, 2012 comment letter to the National Capital Region Transportation Planning Board (TPB), MWAQC emphasizes the need for new federal emission control programs such as Tier 3 to reduce emissions from future fleets. Further, we urge TPB's continued investment in public transit, ride-sharing, and transit-oriented development to mitigate future growth in vehicle emissions. We also strongly urge TPB to maintain its commitments to Transportation Emission Reduction Measures and other emission reduction measures. All of these efforts are essential to meet the 2008 ozone standard and potentially more stringent ozone and fine particle standards expected in the future.

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

Sincerely,



Hon. Leta Mach, Chair
Metropolitan Washington Air Quality Committee