

DRAFT

Metropolitan Washington Air Quality Committee

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October 11, 2006

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

Dear Chair Knapp:

The Metropolitan Washington Air Quality Committee (MWAQC) has reviewed the September 20, 2006 draft *Air Quality Conformity Determination Of The 2006 Constrained Long Range Plan And The FY2007-2012 Transportation Improvement Program For The Washington Metropolitan Region*. We are pleased the proposed transportation plan meets the interim emissions tests 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 2005 CLRP and FY 2006-2011 TIP.

The conformity analysis indicates significant reductions in transportation emissions occurring by 2010 and beyond, creating a significant gap between the maximum allowable emissions levels and the estimated levels of transportation emissions. We note again that the gap is temporary. The existing, 1-hour standard-based emissions budgets will be replaced by new emissions budgets for the 8-hour ozone standard corresponding to years 2008 and 2009 when the new 8-hour ozone SIP is submitted and EPA finds those budgets adequate. New emission budgets for PM_{2.5} may be available for use in conformity in 2008.

We continue to urge States and local governments to maintain their commitments to TERMS and other emission reduction measures, regardless of whether implementation of these measures is currently necessary for conformity. Meeting the 8-hour ozone and PM_{2.5} standards is expected to be a much more difficult effort, requiring continuation of all mobile and non-mobile emission reduction commitments, and possibly new ones in the near future.

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 for attaining the new 8-hour ozone and PM_{2.5} air quality standards.

Sincerely,

Hon. Phil Mendelson, Chair
Metropolitan Washington Air Quality Committee