

# Metropolitan Washington Air Quality Committee

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January 12, 2007

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

Dear Chair Hudgins:

This letter responds to a letter from TPB dated December 20, 2006 regarding mobile source measures proposed for inclusion in the SIP. In the letter, TPB asked for the opportunity to review and comment upon any local government or state transportation measures proposed for the new 8-hour ozone SIPs. The purpose of TPB's review would be to ensure a consistent analytical approach, and to prevent any possibility of double-counting emissions benefits among SIPs and air quality conformity assessment activities.

State and local government transportation measures were included in the 1-hour ozone SIPs and are being proposed for the 8-hour ozone SIPs. The proposals include the TCMs and vehicle-, fuel- and maintenance-based measures transmitted in a TPB letter dated November 7, 2006, as well as a number of mobile source measures advanced by local governments in the region. The remainder of this letter focuses on the measures advanced by local governments.

The Washington DC-MD-VA region's 1-hour ozone SIPs included a bundle of local voluntary measures, among them some mobile source measures (see Attachment 1). In developing the control strategy for the 8-hour ozone SIPs, local jurisdictions are building upon the efforts from the past SIP to include an updated local voluntary bundle. A list of the programs that were identified and are being considered for inclusion in the SIP is also found in Attachment 1. Local jurisdictions are proposing inclusion of low-emission vehicle purchases, diesel retrofits, use of low-VOC paints, purchase of wind energy, and a variety of episodic code orange and code red programs. In addition, LED traffic signal retrofits are being examined as a possible local voluntary measure.

In response to TPB's request, we will transmit proposed mobile measures to DTP staff for review. We appreciate your assistance in identifying inconsistencies in methodology or duplication of measures. The schedule for adopting the 8-hour ozone SIPs calls for a draft SIP to be approved by MWAQC for public comment in March. To this end, we accept your offer and ask that the Technical Committees of TPB and MWAQC collaborate closely to review and reach agreement on the handling of local mobile measures in the SIPs by mid-February.

We look forward to our continuing close technical and policy working relationship as we move towards completion of the draft SIPs to meet EPA's new 8-hour ozone standard.

Sincerely,



Nancy Floreen, Chair  
Metropolitan Washington Air Quality Committee

Attachment 1. Summary of Potential Voluntary Measures Commitments (2002-2009)  
Washington, DC-MD-VA Ozone Nonattainment Area

Jurisdiction	Commitments in 1-hour Ozone SIP	New Additional Commitments for 8-hour Ozone SIP (a)	2005 Emission Reduction Credited in 1-hour Ozone SIP (tpd)	Possible New 2009 Emission Reduction for 8-hour Ozone SIP (tpd)
<b>Regional Wind Power Purchase Program (kWh/year)</b>				
Montgomery County (b)	28,000,000	23,809,091		
Prince George's County		7,611,601		
Arlington County		2,340,000		
Fairfax County		5,800,000		
District of Columbia		16,500		
<b>Total</b>	<b>28,000,000</b>	<b>39,577,192</b>	<b>0.05 NOx</b>	<b>0.07 NOx</b>
<b>Clean Energy Rewards Program (MWh/year)</b>				
Montgomery County		31,900		
<b>Total</b>		<b>31,900</b>	<b>No Credit</b>	<b>No Credit</b>
<b>Renewable Portfolio Standards (kWh/year)</b>				
District of Columbia	-	-	-	-
<b>Total</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>LED Traffic Signal Retrofits (# of intersections)</b>				
VDOT	0	864		
MDOT	0	15		
District of Columbia	0	-		
Montgomery County	0	250		
Arlington County	0	271		
City of Alexandria	0	239		
City of Falls Church	0	818		
<b>Total</b>		<b>-</b>	<b>0</b>	<b>-</b>
<b>Building Efficiency/Energy Performance Contracting (kWh/year savings)</b>				
Fairfax County	0	6,630,675		
Arlington County	0	1,500,000		
City of Greenbelt	0	230,000		
Montgomery County	0	-		
City of Falls Church	0	-		
City of Alexandria	0	-		
Calvert County	0	-		
<b>Total</b>	<b>0</b>	<b>8,360,675</b>	<b>No Credit</b>	<b>No Credit</b>
<b>Diesel Retrofits (# of vehicles)</b>				
Fairfax County School Bus	1,329	Complete		
Fairfax County Class 8 Trucks	0	113		
Fairfax County Fire Equipment	0	50		
Fairfax County DOT (DPF)	148	95		
Fairfax County DOT (idling)		95		
Montgomery County	0	253		
Loudoun County	0	237		
<b>Total</b>			<b>No Credit</b>	<b>-</b>
<b>Low-Emission Vehicle Purchases (# of vehicles)</b>				
Arlington County	0	69		
Fairfax County	32	65		
Montgomery County	5	176		
Prince George's County	3	8		
M-NCPPC Prince George's	0	23		
Loudoun County	0	25		
District of Columbia	0	678		
City of Alexandria	0	55		
City of Greenbelt	0	7		
City of Falls Church	0	7		
<b>Total</b>	<b>40</b>	<b>1113</b>	<b>No Credit</b>	<b>-</b>
<b>Low-VOC Paint (# of gallons per ozone season day)</b>				
Prince George's County	5			
M-NCPPC Prince George's	15			
Fairfax County	40			
MDOT	502.5			
Arlington County		0.63		
City of Alexandria		1.75		
City of Greenbelt		0.20		
Calvert County		1.25		
<b>Total</b>	<b>562.5</b>	<b>3.20</b>	<b>0.166 VOC</b>	<b>0.0009 VOC</b>
<b>Enhanced Enforcement (solvent machine replacement/idling)</b>				
Montgomery County		0 18 units	0	0.003-0.09 VOC
Loudoun County		No Idling Policy		
<b>TOTAL</b>				
NOx			0.2 (a)	0.07
VOC			3.2 (a)	0.09

(a) Total for 1-hour ozone SIP includes several programs not proposed for expansion in the 8-hour ozone SIP. These measures include Reformulated Consumer Products, Auxiliary Power Units for Locomotives, Gas Can Replacements, and Remote Sensing programs.

(b) 24,000 MWh in FY07 and 19,000 MWh in FY08.