



DRAFT

July 16, 2003

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The Honorable Phil Mendelson
 Chairman
 Metropolitan Washington Air Quality Committee
 777 North Capitol Street, NE
 Washington, DC 20002-4239

Dear Chairman Mendelson

The National Capital Region Transportation Planning Board (TPB) greatly appreciates the extensive analytical work, public input, and inter-agency collaboration that went into the development of the draft State Implementation Plan (SIP) approved for public comment by the Metropolitan Washington Air Quality Committee (MWAQC) at its May 28, 2003 meeting. As you know, the TPB is anticipating that the Environmental Protection Agency (EPA) will be able to make an adequacy determination on the new mobile emissions budgets contained in the draft SIP in October of this year. This will allow the TPB to act on the conformity analysis for the 2003 Constrained Long Range Plan (CLRP) and the FY2004-2009 Transportation Improvement Program (TIP) at its October meeting, and to forward the 2003 CLRP and FY2004-2009 TIP for approval by the U.S. Department of Transportation before the January 21, 2004 expiration date of the 2000 CLRP. The TPB has been advised that if the January 21, 2004 deadline is not met a conformity lapse will occur, under which new highway and transit capacity expansion projects in the Washington region will not be able to receive federal approval.

The TPB understands that MWAQC has received extensive comments on the draft SIP during a comment period which ended on July 9, and that these comments are currently being reviewed by MWAQC and state air agency staff. One comment received in a letter of July 7, 2003 from EPA to the Virginia Department of Environmental Quality addressed Appendix G, Emissions Reduction from Transportation Control Measures (TCMs):

“This appendix provides sufficient technical information on the previously implemented TCMs and proposed new TCMs for inclusion in the severe area SIP. It also states that the various jurisdictions will make final commitments after the public comment period ends to implement the new TCMs. The commitments should include identification of how the TCMs will be funded, which agency will have the responsibility for

implementation, a schedule for implementing them and whether these new TCMs have been included in a previous Transportation Improvement Program ("TIP") and/or Transportation Plan ("Plan") for implementation or will be included in the next TIP or Plan which is prepared. These are the items needed to address the requirements found in Section 2.2 of "Guidance on Preparing Enforceable Regulations and Compliance Programs for the 15 Percent Rate-of-Progress Plans," EPA-452/R-93-005, June 1993."

TPB staff members are currently working with the agencies and jurisdictions responsible for implementing the TCMs to provide the information requested by EPA concerning responsibility for TCM implementation, schedule, and funding sources. This information will be forwarded to MWAQC along with the final commitment letters in time for MWAQC's approval action on the SIP document. Other comments received by MWAQC concerning mobile source emissions and TCMs are currently under review. The TPB is prepared to provide any assistance that may be required by MWAQC and state air agency staff in responding to these comments.

The TPB recognizes that, as shown in Table 11-1 on page 11-6 of the draft SIP document (attached), mobile sources account for 30 percent and 48 percent of the 2005 emissions inventories for VOC and NO_x respectively, and that continued efforts are needed to reduce these emissions. Nevertheless, as shown in Exhibits 1 and 2 in Appendix B of the draft SIP (attached), mobile VOC and NO_x emissions have been declining steadily since 1990 despite steady growth in vehicle miles of travel (VMT), with reductions of 22 percent and 18 percent projected in VOC and NO_x respectively from 2002 to 2005. Further, steady reductions in mobile emissions are projected beyond 2005 as new vehicle emissions and fuel standards required by EPA take effect. Substantial investments included in the region's CLRP and TIP in transit expansion and operations, traffic flow improvements, demand management strategies, sidewalks and bicycle trails, and cleaner vehicles and fuels are also contributing to this steady decline in mobile emissions over time.

The TPB appreciates the opportunity to provide these comments on the draft SIP, and is pleased to offer any additional assistance required by MWAQC and the

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state air agencies to permit timely action by EPA on the new mobile emissions budgets.

Sincerely,

Peter Shapiro
Chairman
National Capital Region
Transportation Planning Board

Exhibit 1

Summary Table VOC Mobile Emissions Inventories for "Severe Area" Rate of Progress and Attainment (Tons / Day)

		1990 Adjusted				Uncontrolled		Controlled		Controlled with 6.3 Adj.'s			
		1996	1999	2002	2005	2002	2005	2002	2005	2002	2005		
Network	Start	59.61	36.41	31.33	27.51	24.38	36.11	33.09	25.09	17.00	25.60	17.41	
	Running	162.00	91.36	78.58	71.26	66.74	90.16	88.86	61.36	46.52	61.95	47.22	
	Soak	21.00	11.58	11.01	11.03	11.61	14.18	15.34	11.00	11.02	11.24	11.28	
Off-Network	Diurnals	8.27	5.14	4.63	4.29	4.07	5.25	5.16	3.13	2.82	3.13	2.82	
	Resting	17.31	13.71	12.95	12.46	12.13	15.25	15.57	12.31	10.55	12.31	10.55	
	Local Roads	27.10	15.39	13.56	12.58	11.99	15.86	15.66	9.51	7.30	9.49	7.37	
	School Bus	0.65	0.50	0.46	0.43	0.40	0.48	0.47	0.43	0.38	0.43	0.38	
	Transit Bus	1.27	0.74	0.63	0.51	0.44	0.57	0.49	0.38	0.27	0.38	0.27	
	Auto Access	1.94	1.16	1.01	0.91	0.84	1.97	1.92	1.33	1.02	1.34	1.05	
TOTAL		299.15	176.00	154.16	140.98	132.59	179.82	176.56	124.53	96.88	125.87	98.34	
								Round 6.3 Adjustment:		1.34	1.46		
										125.87	98.34	- 22%	

- NOTES:**
1. Primary travel demand estimates utilize Round 6.2 forecasts
 2. Emission Factors reflect I/M and diesel sales fractions "technical corrections"
 3. Start-up emissions reflect 4/30/03 program code updates
 4. 2002 and 2005 controlled network emissions reflect Round 6.3 forecasts.

Source: "Plan to Improve Air Quality in the Washington, DC-MD-VA Region,"
June 2, 2003 (Percentage added)

Exhibit 2

Summary Table
NOx Mobile Emissions Inventories
for "Severe Area" Rate of Progress and Attainment
(Tons / Day)

	1990 Base	1990 Adjusted				Uncontrolled		Controlled		Controlled with 6.3 adj.'s		
		1996	1999	2002	2005	2002	2005	2002	2005	2002	2005	
Network	Start	23.10	19.93	18.89	18.63	17.87	24.38	24.83	13.85	10.70	14.13	10.95
	Running	324.37	258.63	247.14	228.41	207.06	281.10	268.06	249.71	203.20	251.58	204.25
	Soak	—	—	—	—	—	—	—	—	—	—	—
Off-Network	Diurnals	—	—	—	—	—	—	—	—	—	—	—
	Resting	—	—	—	—	—	—	—	—	—	—	—
	Local Roads	17.73	12.03	11.20	10.70	10.42	13.90	13.49	11.21	10.27	11.21	10.38
	School Bus	5.97	5.72	5.69	5.65	5.38	6.35	6.34	6.09	5.49	6.09	5.49
	Transit Bus	8.16	6.42	6.08	5.82	5.37	6.54	6.03	6.59	5.55	6.59	5.55
	Auto Access	1.47	1.06	0.99	0.96	0.94	2.13	2.21	1.67	1.45	1.67	1.50
	TOTAL	380.80	301.79	289.98	268.18	247.04	334.40	320.96	289.12	236.67	291.28	238.12
Round 6.3 Adjustment:									2.16	1.45		
									291.28	238.12		← -18% →

- NOTES:**
1. Primary travel demand estimates utilize Round 6.2 forecasts
 2. Emission Factors reflect I/M and diesel sales fractions "technical corrections"
 3. Start-up emissions reflect 4/30/03 program code updates
 4. 2002 and 2005 controlled network emissions reflect Round 6.3 forecasts.

Source: "Plan to Improve Air Quality in the Washington, DC-MD-VA Region,
June 2, 2003 (Percentage added)

**Table 11-1
Projected Controlled 2005 Emissions vs. Modeled Attainment Emissions**

Emissions Type	VOC	NOx	VOC	VOC	NOx	NOx
	Modeled (tpd)	Modeled (tpd)	Controlled 2005 (tpd) (Round 6.2)	Controlled 2005 (tpd) (Round 6.3)	Controlled 2005 (tpd) (Round 6.2)	Controlled 2005 (tpd) (Round 6.3)
Point	15.6	171.1	17.3	17.3	109.8	109.8
Area	153.8	54.3	138.3	142.2	61.0	62.6
Mobile	123.5	196.8	96.6	98.1	236.0	237.5
Non-road	66.8	93.1	69.4	71.1	82.2	83.2
Total	359.7	515.3	321.6	328.7	489.0	493.1

*Small discrepancies may result due to rounding

It is clear from the above Table 11-1 that both NOx and VOC projected controlled emissions in the attainment year 2005 are lower than the modeled attainment inventories and thus attainment is demonstrated in the year 2005.

11.5 Overall Conclusion

Based on the results from the July 1991 modeling, EPA's Tier 2 modeling, comparison of projected controlled 2005 and modeled attainment inventory, and the two Weight of Evidence tests; there is evidence that the Washington region will attain the 1-hour ozone standard in the year 2005.

References:

- 1 State Implementation Plan (SIP) Revision, Phase II Attainment Plan for the Washington DC-MD-VA Nonattainment Area, Prepared by the Metropolitan Washington Council of Governments, February 3, 2000.
2. *Ozone Transport Assessment group Executive Report 1997*, Environment Council of the States (ECOS) pp. 53-55. (<http://www.epa.gov/ttn/otag>)
3. Technical Support Document for the Tier 2/Gasoline Sulfur Ozone Modeling Analyses, EPA420-R-99-031, December 1999.

Source: "Plan to Improve Air Quality in the Washington DC-MD-VA Region," June 2, 2003 (Percentages added)