

Metropolitan Washington Air Quality Committee

Suite 300, 777 North Capitol Street, N.E. Washington, D.C. 20002-4239 202-962-3358 Fax: 202-962-3203

November 24, 2003

Hon. Peter Shapiro, Chair
National Capital Region Transportation Planning Board
777 North Capitol St., NE
Washington, D.C. 20002-4239

Dear Mr. Shapiro:

On behalf of the Metropolitan Washington Air Quality Committee (MWAQC) and its Technical Advisory Committee (TAC), I am hereby providing our comments on the proposed conformity determination, 2003 Constrained Long-Range Plan (CLRP) and FY 2004-09 Transportation Improvement Program (TIP) released for comment on October 15, 2003.

MWAQC is pleased that the National Capital Region Transportation Planning Board (TPB) has developed a transportation plan that meets the mobile budgets proposed in MWAQC's August 2003 SIP Revision. Furthermore, MWAQC congratulates the TPB on adopting a plan that provides a small margin of safety for both the VOC and NOx budgets. MWAQC encourages TPB to continue to fund the Transportation Emission Reduction Measures (TERMs) outlined in the draft plan, regardless of whether implementation of such measures is necessary for conformity purposes.

After reviewing the draft conformity document, MWAQC believes that the "Total" 2005 emissions listed in Exhibit 15, currently the sum of network and off-network emissions, should be further reduced by the value of the TCMs included in the region's August 2003 SIP revision. TCMs included in this document total approximately 0.3 tpd VOC and 0.7 tpd NOx. MWAQC believes that the majority of the emission reductions resulting from these projects are not currently accounted for through either the network or the off-network analysis. Furthermore, the reductions from all TCM projects should be reflected in the appropriate locations on the TERM Tracking Sheet. As with other TERMs, TCM benefits should be separated to indicate whether the projects were completed before or after the year 2000. The TERM Tracking Sheet appears on p. 48-53 of the draft Conformity Analysis.

MWAQC wishes to commend TPB for its partnership in improving the air quality and health of citizens in the Metropolitan Washington area.

Sincerely,

Signature On Original

Hon. Phil Mendelson, Chair
Metropolitan Washington Air Quality Committee