



Metropolitan Washington  
Council of Governments

November 12, 2025

The Honorable James Walkinshaw, Chair  
National Capital Region Transportation Planning Board  
777 North Capitol Street, NE, Suite 300  
Washington, D.C. 20002

Dear Chair Walkinshaw:

Thank you for providing an opportunity to comment on the draft air quality conformity analysis for the Visualize 2050 plan. MWAQC has reviewed the above analysis and concurs that the transportation sector emissions associated with the proposed transportation plans meet the motor vehicle emissions budgets (MVEBs) in the 2008 Ozone National Ambient Air Quality Standard (NAAQS) Maintenance Plan Update.

However, the Visualize 2050 plan continues to require the use of safety margins to meet the MVEBs and demonstrate conformity for volatile organic compounds (VOC) in 2025 and 2030. MWAQC urges TPB and its members to give particular focus to projects that would reduce air pollution emissions from the transportation sector so that future emissions from that sector remain below the MVEBs without safety margins to fully protect the health of our residents.

The draft Design Value data for ozone for the Washington region for the period 2023 through 2025 is 69 ppb parts per billion (ppb). This shows that the region is in compliance with the 2015 ozone NAAQS, however the region needs to continue reducing its emissions to maintain this compliance in the future. The projected year 2025 emissions inventory for the region in the above maintenance plan update submitted to EPA in 2023 shows onroad sources to be a significant contributor (26%) of NO<sub>x</sub> emission in the region. Therefore, it is essential that the region reduces its emissions further in order to keep complying with the 2015 ozone NAAQS from all sources, including onroad mobile sources.

MWAQC notes that the region also is experiencing an increase in total VMT along with an increase in population and job growth. Therefore, we urge TPB's continued investment in VMT and emission reduction strategies such as public transit, ride-sharing, pedestrian and bike infrastructure, other travel demand management strategies, and Transportation Emission Reduction Measures (TERMS) to reduce future growth in vehicle emissions.

Thank you again for the opportunity to comment on the draft conformity analysis for the Visualize 2050 plan.

Sincerely,

Hon. Thomas Dernoga  
Chair, Metropolitan Washington Air Quality Committee