

Air Quality Public Advisory Committee

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<http://www.mwcog.org/environment/committee/>

The Air Quality Public Advisory Committee (AQPAC) is an advisory body to the Metropolitan Washington Air Quality Committee (MWAQC).

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Dear MWAQC:

During AQPAC meetings this summer and fall, we have discussed control strategies to reduce emissions as part of the upcoming eight-hour ozone State Implementation Plan (SIP). In October, we co-hosted a public town hall meeting on air quality in the region and received many excellent suggestions on how the Washington region can clean its air.

As your public advisory committee, we recommend the following based on our discussions:

1. Emission reductions should be sought that will be sufficient to reach attainment status. In the long-term, we need to develop a 'vision for the future of air quality' in the Washington DC region.
2. In looking at emission reductions, it is important to look at the type of ozone precursor (i.e., hydrocarbons versus nitrogen oxides) because, in the formation of ozone, the Washington Metropolitan Area is more sensitive to nitrogen oxide emissions.
3. Transit service should continue to be promoted and expanded.
4. The original list of emission reduction strategies may need to be revisited due to changed cost, effectiveness, and feasibility considerations.

On the first point, we are concerned about over-reliance on modeling results that seem to predict precise attainment but which may not adequately account for the uncertainties inherent in modeling. We are mindful that MWAQC has taken into account the margin of error in the models, which increases the likelihood achieving compliance. However, we recommend moving beyond the mindset of doing to minimum necessary to reach compliance by developing a long-term vision of air quality for the region. Such a vision will fully take into account the economics of human health, quality of life, sustainable development, increasingly tighter standards, and potential designations of new pollutants (such as greenhouse gases) over time. We urge the MWAQC and offer our cooperation to make the Washington region a leader in clean air, by envisioning long-term air quality goals beyond compliance and targeting more emissions reductions than are precisely called for by the modeling analysis to maximize the benefits to the health and well-being of the residents of the Washington metro region.

On the second point, the search for efficient ways to reduce emissions should not minimize reductions in nitrogen oxide emissions. The Washington Metropolitan Area is more sensitive to nitrogen oxide emissions as they contribute to ozone than is the case for hydrocarbons. Thus, while achieving further emissions of nitrogen oxide emissions will be challenging, they may be the most effective means of actually improving the region's air quality. We encourage careful

evaluation of the scientific literature, the modeling results, and control measures to be sure of the relative role of nitrogen oxide and hydrocarbon emissions in this region.

On the third point, MetroRail, MetroBus/RideOn, and the local transit system have played a key role in improving air quality in the region to the improved conditions we have today. Current expansion of public transit should be promoted in order to continue these benefits and help us exceed our new air quality targets. We must maintain sufficient capacity, whether through better schedules, new rail cars, new appropriately sized and clean fuel buses, and subsidized fares to the extent necessary, to avoid a loss of modal share to single occupancy vehicles. Teleworking should be promoted through incentive programs with regional employers, especially on predicted Code Orange and Red days. Additionally, all three jurisdictions (District of Columbia, Maryland, and Virginia) should ensure dedicated annual funding for Metro transit as is currently being discussed and considered in the public arena. We support the proposed annual auditing of this dedicated funding, assuming it is clear and transparent.

Finally, on the fourth point, in considering emission reduction opportunities, we think it would be prudent to revisit emissions reduction options from the original control strategies list that were not chosen for implementation in years past, as well as to consider new opportunities. In some cases, they might now be the most cost effective and best alternatives. Opportunities that we discussed or that were raised at the public meeting include:

- Reducing emissions from industrial-commercial-institutional boilers and asphalt boilers.
- Promoting and using plug-in hybrid vehicles and encouraging local governments to include hybrids in their fleets.
- Reducing diesel engine emissions from truck idling by providing electrical access for trucks at truck and bus stops and rest areas.
- Protecting and increasing tree cover in the region, as well as promoting green roofs for energy efficiency.
- Supporting and purchasing renewable energy, such as wind power in the western part of Virginia and Maryland, solar roofs in the District of Columbia, and biodiesel and biofuels.

We believe long-term solutions to air quality must be pursued. Land use and transportation planning should incorporate Smart Growth and Sustainable Development principles. We appreciate that the timeframe required for these activities to yield benefits may exceed the schedule for the preparation of a SIP—but they are critical for the long-term interests and health of the region.

Please contact me if you have any questions, or if we can otherwise be of assistance.

Sincerely,

Jill Engel-Cox, Ph.D.
AQPAC Chair