

Metropolitan Washington Air Quality Committee

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September 23, 2009

United States Environmental Protection Agency
EPA Docket Center (EPA/DC), Mailcode 2822T
Attention Docket ID No. EPA-HQ-OAR-2005-0161
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Docket ID No. EPA-HQ-OAR-2005-0161

To: U.S. Environmental Protection Agency

I am writing on behalf of the Metropolitan Washington Air Quality Committee (MWAQC) regarding EPA's Proposed Renewable Fuel Standard proposed on May 26, 2009. MWAQC is certified by the governors of Maryland and Virginia and the mayor of the District of Columbia to develop regional air pollution control strategies for the Washington, DC-MD-VA region.

While federal actions to address greenhouse gas emissions from motor vehicle fuels will be a critical component of our national response to climate change, MWAQC is very concerned that EPA has not characterized the potential air quality impacts associated with the increased use of biofuels mandated in this proposed regulation.

As you're aware, EPA has recently lowered the National Ambient Air Quality Standard (NAAQS) for ozone and is currently proposing revisions to the NAAQS for NO₂. Attaining the new lower ozone standards will be challenging, air quality monitoring data suggest that polluted air transported into our region is often already at levels that exceed the proposed new standard. As EPA indicates in the proposed rule, emissions of the ozone precursor NO_x are expected to increase as a result of the proposed biofuels mandate, however, EPA did not provide any results from air quality modeling studies that would enable the region to better understand the likely air quality impacts as it develops plans to meet the new standard.

We believe a comprehensive federal analysis of anticipated air quality impacts is therefore essential before finalizing the proposal. To meet the new lower NAAQS, MWAQC needs the full cooperation and support of the federal government to address sources of emissions that are outside the control of state and local governments. To this end, EPA should initiate strong proactive steps to mitigate the anticipated increase in emissions through other regulatory initiatives.

Sincerely,

Phil Mendelson, Chair
Metropolitan Washington Air Quality Committee