Suggested Changes From VDOT

Following up the discussions at this month's MWAQC TAC meeting please accept VDOT's suggested changes to the Draft Letter the TAC discussed on the subject. While we agree with the overall gist/focus of the letter VDOT believes that the potential adverse impact of the proposed standards on this region's ability to meet existing Ozone and PM2.5 standards (particularly in the transportation sector) should be explicitly and clearly cited in the letter. Additionally VDOT believes the MWAQC should call on EPA to address this potential adverse impact.

To this end VDOT suggests adding the following to the first paragraph of the draft letter.

While the proposed RFS helps address issues of national concern in enhancing energy security and reducing greenhouse gas emissions, we are also concerned about the potential impact of the proposed rule on regional ground level ozone and particulate matter levels. Therefore, should the rule be implemented as proposed, we urge EPA to mitigate these potential impacts and adopt appropriate, timely and cost-effective emission controls that can be implemented on a national and regional scale.