

STAPPA / ALAPCO

STATE AND TERRITORIAL
AIR POLLUTION PROGRAM
ADMINISTRATORS

ASSOCIATION OF
LOCAL AIR POLLUTION
CONTROL OFFICIALS

S. WILLIAM BECKER
EXECUTIVE DIRECTOR

November 22, 2004

Mr. Jeffrey R. Holmstead
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Ms. Sharon L. Pinkerton
Assistant Administrator
Aviation Policy, Planning and Environment
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Dear Mr. Holmstead and Ms. Pinkerton:

On behalf of the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO), we write to formally notify you of our associations' withdrawal from the stakeholder process facilitated by the U.S. Environmental Protection Agency (EPA) and the Federal Aviation Administration (FAA) to develop a voluntary emission reduction program for the aviation sector. As part of this decision, STAPPA and ALAPCO have rejected the ground service equipment (GSE) memorandum of understanding that was proposed through this process.

Emissions from the aviation sector represent an important and growing cause of concern to those responsible for achieving and sustaining clean, healthful air across the nation. Because states and localities are restricted in their ability to regulate aircraft emissions, representatives of several state and local environmental agencies and organizations of air pollution control officials entered into this stakeholder process in 1999 with the strong and clearly stated desire to reach agreement on an appropriate strategy for achieving meaningful reductions in emissions from aircraft engines. As the discussions ensued, industry representatives to the process urged that other aviation-related emission sources, particularly GSE, be considered. State and local representatives agreed to broaden the scope of the

evaluation of potential additional emission reduction opportunities with the understanding that our primary objective continued to be reducing emissions from aircraft engines. More than five years later, we are extremely disappointed that no progress was made concerning the primary objective of reducing aircraft emissions.

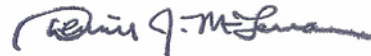
With regard to the GSE memorandum of understanding, during their 2004 Summer Meeting, the STAPPA and ALAPCO Boards of Directors and Committee Chairs unanimously agreed that the proposal was inadequate and voted to reject it. A year ago, when the state/local representatives to the GSE negotiations briefed the members of STAPPA and ALAPCO at the associations' 2003 Fall Membership Meeting on the status of the negotiations, our members identified many overarching concerns that would need to be addressed in order for the associations to support a GSE MOU. In the following months, the state/local negotiators continued to articulate these concerns during the stakeholder discussions. While we understand some progress was made, the final proposal offered this summer was inadequate in terms of scope and stringency and placed unacceptable constraints on state and local air agencies' abilities to protect the public from the adverse health impacts associated with aviation-related pollution. Among the elements of greatest concern were 1) the inadequate fleet average emission standard for NO_x, 2) the exclusion of other pollutants, especially fine particulate matter, 3) the exclusion of airports beyond those in ozone nonattainment areas and 4) inadequate protections against "dumping" old equipment at non-participating airports.

In conclusion, we appreciate EPA's and FAA's efforts in trying to facilitate an agreement to affect voluntary reductions in aviation emissions. We share the disappointment of other stakeholders that the group was unable to reach agreement. Although STAPPA and ALAPCO and the state/local representatives have decided not to continue to participate in the stakeholder process, the issue of aviation emissions remains a critical concern for state and local air agencies. Accordingly, we are committed to identifying and implementing strategies to achieve meaningful reductions in emissions from the aviation sector.

Sincerely,



Nancy L. Seidman
STAPPA President



Dennis J. McLerran
ALAPCO President