

Appendix K

Information Related to Public Hearings, Hearing Notices, Comments Received and Response to Comments

Public Hearings on Washington Region's Air Quality Plan

January 22, 2004 6:00 pm	Maryland Dept. Of the Environment High Point High School 3601 Powder Mill Road Beltsville, MD 20705
January 21, 2004 11:00 am	Northern Regional Office Virginia Dept. Of Environmental Quality 13901 Crown Court Woodbridge, VA
January 20, 2004 6:00 pm	District of Columbia D.C. Dept. Of Health Old City Council Chambers One Judiciary Square 441 4 th Street, NW Washington, D.C.

PUBLIC COMMENT DEADLINES and Addresses:

MWAQC: Email: mwaqcpubliccomment@mwkog.org

Virginia: **5:00 pm, January 21, 2004**
Director, Office of Regulatory Development
Dept. of Environmental Quality
P.O. Box 10009
Richmond, VA 23240
Email: ramann@deq.state.va.us

Maryland: **5:00 pm, January 22, 2004**
Mr. Randall Carroll
MDE, ARMA
1800 Washington Blvd, STE 730
Baltimore, MD 21230
Email: Rcarroll@mde.state.md.us

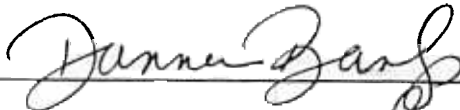
D.C. DOH **4:00 pm, January 20, 2004**
Mr. Abraham Hagos
D.C. DOH, EHA
51 N. Street, NE
Washington, D.C. 20002
Email: abraham.hagos@dc.gov

PROOF OF PUBLICATION
The Washington Post

District of Columbia, ss., Personally appeared before me, a Notary Public in and for the said District, Donna M. Banks well known to me to be Billing & Verification Assistant Manager of The Washington Post, a daily newspaper published in the City of Washington, District of Columbia, and making oath in due form of law that an advertisement containing the language annexed hereto was published in said newspaper on the dates mentioned in the certificate herein.

I Hereby Certify that the attached advertisement was published in The Washington Post, a daily newspaper, upon the following date at a cost of \$1,018.16, and was circulated in the Washington metropolitan area.

Published 1 time. Date: Dec 18, 2003
Account 6081123



Witness my hand and official seal this 2ND day of January 20 04



My commission expires GARLAND CHRISTMAS, JR
NOTARY PUBLIC DISTRICT OF COLUMBIA
MY COMMISSION EXPIRES 06/30/2006

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
NOTICE OF PUBLIC HEARING ON AIR QUALITY PLAN**

The Maryland Department of the Environment will hold a public hearing on a proposed revision to the Maryland State Implementation Plan (SIP) for the Maryland portion of the Washington, DC-MD-VA ozone nonattainment area and a proposed revision to the Maintenance Plan for carbon monoxide for the Washington, DC-MD-VA carbon monoxide attainment area. The Hearings will be held on:

January 22, 2003 at 6:00 PM at the High Point High School, Media Center, 3601 Powder Mill Road, Beltsville, Maryland 20705.

The Public Hearings will be held as required by federal law (Clean Air Act at 42 U.S.C. 7410 (a) and 40 CFR 51.102).

Public Hearing Notice

I. Revised State Implementation Plan (SIP) for Ozone

The proposed plan, "State Implementation Plan (SIP) Demonstrating Rate of Progress for 2002 and 2005, Revision of 1990 Baseline Emissions, and Severe Area Attainment for the Washington, DC-MD-VA Nonattainment Area," consists of two Rate of Progress demonstrations for the period 1999-2002 and 2002-2005, a revised baseline emissions inventory for 1990, and an attainment demonstration for 2005. In addition, the plan includes commitments by the state to meet Clean Air Act requirements for severe nonattainment areas and to meet additional EPA requirements for the Washington region including a contingency plan for 1999 rate of progress, contingency plans for the 2002 and 2005 rates of progress, an analysis of Reasonably Available Control Measures, and Transportation Control Measures.

This State Implementation Plan revises the State Implementation Plan submitted in August 2003. The plan submitted in August did not include contingency measures, as they were not necessary to a determination of adequacy for the mobile budget. The revised plan includes contingency plans for 2002 and 2005. In addition, the mobile emissions inventories as well as stationary, area and non-road emissions inventories, have been revised using the latest population forecasts approved for the Metropolitan Washington region for 2005, Cooperative Forecast Round 6.3. The controlled

inventories have been revised to reflect the use of a package of voluntary measures in the attainment strategy and additional technical corrections have been made to some inventory categories.

The Severe Area Attainment Plan is intended to show the progress being made to improve air quality in the Washington nonattainment area and the efforts underway to assure that all necessary steps are taken to reach the federal health standard for ground-level ozone by 2005. The plan has been prepared by the Metropolitan Washington Air Quality Committee (MWAQC) to comply with the Clean Air Act Amendments of 1990 and with EPA requirements for the Washington region as stated in EPA's reclassification notice of the Washington region (January 2003) and in EPA's conditional approval of the Metropolitan Washington region's State Implementation Plan (April 2003).

The proposed plan was prepared by the Metropolitan Washington Air Quality Committee (MWAQC), which consists of elected officials from the affected localities and representatives of state transportation and air quality planning agencies.

On December 17, 2003, MWAQC approved the proposed plan for release for public review and comment. Comments are invited on the entire plan, the proposed control measures and the proposed contingency measures.

The proposed air quality plan is available online at <http://www.mwcog.org/environment/air/>

II. Revised Carbon Monoxide Maintenance Plan and Revised 1990 Carbon Monoxide Base Year Emissions Inventory for the Washington DC-MD-VA Nonattainment Area

The Revised Carbon Monoxide Maintenance Plan demonstrates that the Washington DC-MD-VA area continues to attain the 8-hour carbon monoxide standard. The Metropolitan Washington DC-MD-VA region attained the federal carbon monoxide standard in the 1990's. In accordance with the Clean Air Act Amendments of 1990 (CAAA), Section 175A(a); the states submitted a carbon monoxide maintenance plan for the Washington region covering the period 1996-2007. EPA approved this maintenance plan effective March 16, 1996. CAAA Section 175A(b), requires the region to submit a second maintenance plan within eight years of its redesignation as an attainment area. The revised maintenance plan must provide for maintenance of the carbon monoxide standard for 20 years after attainment. This maintenance plan is submitted in fulfillment of the Section 175A(b) requirement, and provides for attainment of the carbon monoxide standard in the Washington, DC-MD-VA attainment area through March 16, 2016.

The proposed plan was prepared by the Metropolitan Washington Air Quality Committee (MWAQC), which consists of elected officials from the affected localities and representatives of state transportation and air quality planning agencies. On December 17, 2003, MWAQC approved the proposed plan for release for public review and comment. Comments are invited on the entire plan, the proposed control measures and the proposed contingency measures.

The proposed air quality plan is available online at <http://www.mwcog.org/environment/air/>

An electronic copy of the proposed revision will also be available on the Maryland Department of the Environment's website at http://www.mde.state.md.us/Programs/AirPrograms/air_planning/index.asp starting on Dec 22, 2003. Note: the public library systems in Maryland can be used for Internet access to view the document.

Copies of the document can be viewed at the following locations:

1. Maryland Department of the Environment Office, Air and Radiation Management Administration, 1800 Washington Boulevard, Suite 730, Baltimore, Maryland - Contact: Randall Carroll or Douglas Austin.
2. Metropolitan Washington Council of Governments, Suite 300, 777 North Capitol Street, NE, Washington, DC 20002
3. For computer viewing Public Libraries located within Maryland have full Internet access capability. The librarian or reference personnel would be available to assist you should you experience any difficulty accessing this site.

Written comments may be presented at the Hearing or mailed to Randall Carroll, MDE ARMA, 1800 Washington Boulevard, Baltimore, MD, 21230 to be

received before close of business January 22, 2004.

A hearing impaired person may request that an interpreter be present at the hearing by notifying MDE five (5) business days before the hearing. TTY via Maryland Relay for the hearing impaired is (410) 537-4396.

For more information contact Joan Rohlfs, Metropolitan Council of Governments at (202) 962-3200 or Randall Carroll, Air Quality Planner, at (410) 537-3252 (Toll free in Maryland call (800) 633-6101 ext. 3252) or RCarroll@mde.state.md.us.

Maryland Department of the Environment
Air and Radiation Management Administration
1800 Washington Boulevard, STE 730
Baltimore, Maryland 21230

PUBLIC HEARING NOTICE

The Department of Environmental Quality (DEQ) will hold a public hearing on three proposed revisions to the Commonwealth of Virginia State Implementation Plan (SIP). The hearing will be held in the Conference Room, Department of Environmental Quality, Northern Virginia Regional Office, 13901 Crown Court, Woodbridge, Virginia, at 11:00 a.m. on January 21, 2004, to accept testimony concerning the proposed revisions. Using the procedures explained below, the DEQ will also accept written comments until 5:00, January 21, 2004.

I. Revised Attainment Plan for the Washington DC-MD-VA Ozone Nonattainment Area

The proposed revision (State Implementation Plan (SIP) Demonstrating Rate of Progress for 2002 and 2005, Revision of 1990 Baseline Emissions, and Severe Area Attainment for the Washington, DC-MD-VA Nonattainment Area) consists of: rate of progress demonstrations for the periods 1999-2002 and 2002-2005, a revised baseline emissions inventory for 1990, and an attainment demonstration for 2005. In addition, the plan includes commitments by the Commonwealth to meet Clean Air Act requirements for severe nonattainment areas, and to meet additional EPA requirements for the Washington region, including: a contingency plan for 1999 rate of progress, contingency plans for the 2002 and 2005 rates of progress, an analysis of reasonably available control measures, and transportation control measures.

This proposed revision amends the revision submitted in August 19, 2003. The plan submitted on August 19, 2003 did not include contingency measures because they were not necessary for a determination of adequacy for the mobile emissions budget. The revised plan includes contingency plans for 2002 and 2005. In addition, the mobile emissions inventories, as well as stationary, area and non-road emissions inventories, have been revised using the latest population forecasts approved for the Washington region for 2005, Cooperative Forecast Round 6.3. The controlled inventories have been revised to reflect the use of a package of voluntary measures in the attainment strategy and additional technical corrections have been made to some inventory categories.

The Severe Area Attainment Plan is intended to show the progress being made to improve air quality in the Washington nonattainment area and the efforts underway to assure that all necessary steps are taken to reach the federal health standard for ground-level ozone by 2005. The plan has been prepared to comply with the Clean Air Act and with the requirements stated in EPA's reclassification notice of the Washington region (January 24, 2003, 68 FR 3410) and in EPA's conditional approval of the Washington region's air quality plan (April 17, 2003, 68 FR 19106).

The proposal was prepared by the Metropolitan Washington Air Quality Committee (MWAQC), which consists of elected officials from the affected localities and representatives of state transportation and air quality planning agencies. On December

17, 2003, MWAQC approved the proposal for release for public review and comment. Comments are invited on the entire proposal, the proposed control measures and the proposed contingency measures.

The proposal is available online at <http://www.mwcog.org/environment/air/>

II. Revised Carbon Monoxide Maintenance Plan and Revised 1990 Carbon Monoxide Base Year Emissions Inventory for the Washington DC-MD-VA Carbon Monoxide Maintenance Area

The proposed revision (Revised Carbon Monoxide Maintenance Plan and Revised 1990 Carbon Monoxide Base Year Emissions Inventory for the Washington DC-MD-VA Carbon Monoxide Maintenance Area) consists of a demonstration that the Washington DC-MD-VA area is in continued attainment with the 8-hour carbon monoxide standard. The Metropolitan Washington DC-MD-VA region attained the federal carbon monoxide standard in the 1990s. In accordance with Section 175A(a) of the Clean Air Act, the Commonwealth submitted a carbon monoxide maintenance plan for the Washington region covering the period 1996-2007. EPA approved this maintenance plan effective March 16, 1996. Section 175A(b) of the Act requires the Commonwealth to submit a second maintenance plan within eight years of its redesignation as an attainment area. The revised maintenance plan must provide for maintenance of the carbon monoxide standard for 20 years after attainment. This maintenance plan is submitted in fulfillment of the Section 175A(b) requirement, and provides for attainment of the carbon monoxide standard in the Washington, DC-MD-VA attainment area through March 16, 2016.

The proposal was prepared by the Metropolitan Washington Air Quality Committee (MWAQC), which consists of elected officials from the affected localities and representatives of state transportation and air quality planning agencies. On December 17, 2003, MWAQC approved the proposal for release for public review and comment. Comments are invited on the entire proposal, the proposed control measures and the proposed contingency measures.

The proposal is available online at <http://www.mwcog.org/environment/air/>

III. Fredericksburg Ozone Nonattainment Area Agreement

The proposed revision (Memorandum of Agreement to Allow EPA to Grant the Separation of the Fredericksburg 8-Hour Ozone Nonattainment Area from the Washington DC 8-Hour Ozone Nonattainment Area) consists of an agreement to be executed by EPA Region III and the Virginia Department of Environmental Quality. The agreement provides that Region III would designate Stafford County, Spotsylvania County, Caroline County, and the City of Fredericksburg as a nonattainment area (to be known as the Fredericksburg ozone nonattainment area) separate from the Washington DC 8-hour ozone nonattainment area. Stafford County and Spotsylvania County and the City of Fredericksburg are part of the 1999 Washington Metropolitan Statistical Area and would be, without this agreement, presumptively within the boundaries of the Washington

DC 8-hour ozone nonattainment area, according to EPA policy. The final decision as to whether these localities will or will not be nonattainment will not be made until April 2004. The EPA action to separate the Fredericksburg area is subject to certain stipulations that are specified in the agreement.

The proposal is available online at <http://www.deq.state.va.us/>

Comments must be submitted according to the procedures specified in the next paragraph to be considered in the formation of the final revisions; however, questions may be directed to James E. Sydnor, Director, Office of Air Quality Planning, Department of Environmental Quality, (email: jesydnor@deq.state.va.us) (phone: 804-698-4424).

Persons desiring to testify at the hearing should preferably furnish the DEQ with a written copy of their presentation and any supporting documents or exhibits. All comments must be received by the Department by 5:00 p.m., January 21, 2004 to be considered. It is preferred that all comments be provided in writing to the Department, along with any supporting documents or exhibits; however, oral comments will be accepted at the hearing. Comments may be submitted by mail, facsimile transmission, e-mail, or personal appearance at the hearing mentioned above; however, all written comments not provided at the hearing must be submitted to the Director, Office of Regulatory Development, Department of Environmental Quality, P.O. Box 10009, Richmond, Virginia 23240 (email: ramann@deq.state.va.us) (fax number 804-698-4510). Comments by facsimile transmission will be accepted only if followed by receipt of the signed original within one week. Comments by e-mail will be accepted only if the name, address, and phone number of the commenter are included. All testimony, exhibits and documents received are matters of public record.

The proposal and any supporting documents subject to this public hearing may be examined by the public at (1) the DEQ Main Street Office, 8th Floor, 629 E. Main Street, Richmond, Virginia, (804) 698-4070 and (2) the Northern Regional Office, Department of Environmental Quality, 13901 Crown Court, Woodbridge, Virginia (Phone 703-583-3800) between 8:30 a.m. and 4:30 p.m. of each business day until the close of the public comment period.

Each of the proposed revisions is available online at the web site location specified above. In addition, the proposed plan may be examined by the public at any library or library branch having access to the web sites mentioned above.

District of Columbia Public Hearing Notice

DECEMBER 20, 2003

The Washington Times

SECTION E

2600 Legal Notices

GOVERNMENT OF THE DISTRICT OF COLUMBIA DEPARTMENT OF HEALTH NOTICE OF PUBLIC HEARING ON AIR QUALITY ISSUES

Notice is hereby given that a public hearing will be held on January 20, 2004 at 6:00 p.m. in the auditorium off the Lobby at One Judiciary Square, 441 4th Street, NW, Washington, D.C. This hearing provides interested parties an opportunity to comment on: 1) a proposed revision to the District's State Implementation Plan (SIP) for the Washington, DC-MD-VA ozone nonattainment area; 2) proposed amendments to Chapter 3 of Title 20 of the District of Columbia Municipal Regulations (20 DCMR) to include a fee penalty provision in the Title V regulations if the Washington, DC-MD-VA nonattainment area fails to attain the 1-hr ozone standard in 2005 and the ; and 3) proposed revision to the Maintenance Plan for carbon monoxide for the Washington, DC-MD-VA carbon monoxide attainment area.

The proposed SIP revises the one submitted in August 2003. The revised plan includes commitments by the District of Columbia (DC) and the two states to meet Clean Air Act requirements for severe ozone nonattainment areas. The Severe Area Attainment Plan is intended to show the progress being made to improve air quality in the Washington nonattainment area and the efforts underway to assure that all necessary steps are taken to reach the federal health standard for ground-level ozone by 2005. The plan has been prepared by the Metropolitan Washington Air Quality Committee (MWAQC). The Revised Carbon Monoxide Maintenance Plan demonstrates that the Metropolitan Washington DC-MD-VA area is in continued attainment with the 8-hour carbon monoxide standard, which was Metropolitan Washington DC-MD-VA attained in 1991. The revised maintenance plan must provide for maintenance of the carbon monoxide standard for 20 years after attainment. This maintenance plan provides for attainment of the carbon monoxide standard in the Washington, DC-MD-VA attainment area through March 16, 2016.

The proposed plan was prepared by the Metropolitan Washington Air Quality Committee (MWAQC), which consists of elected officials from the affected localities and representatives of the states and DC transportation and air quality planning agencies. On December 17, 2003, MWAQC approved the proposed plan and DC and the states are releasing it for public review and comment. The proposed air quality plan is available online at <http://www.mwacq.org/environment/air/>

Copies of the proposed SIP revisions and the draft proposed amendment to 20 DCMR are available for public review during normal business hours at the offices of the Environmental Health Administration (EHA), 51 N Street, NE, Room 6051, Washington, D.C. 20002, and at the following D.C. Public Library branches: 901 G Street, NW; Connecticut Avenue & McKinley Street, NW; 37th Street & Alabama Avenue, SE; Wisconsin Avenue & R Street, NW; 18th Street & Rhode Island Avenue, NE. Interested parties wishing to testify at this hearing should furnish in writing their names, addresses, telephone numbers and affiliation, if any to Mr. Abraham Hagos at EHA by 4:00 p.m., January 20, 2004. No written comments will be accepted after January 20, 2004. For more information, call Mr. Hagos at 202-535-1354 or email him at abraham.hagos@dc.gov

Comments Received on Draft Ozone SIP, March 2004 Submittal

Thursday, February 19, 2004

TOPIC: *Attainment Demonstration*

ID	Commenter	Comment	Response
Attain-1	Northern Virginia Transportation Alliance	The revised SIP is good for the region. It attains the one hour standard ahead of schedule.	MWAQC and the states believe that the attainment and rate of progress demonstrations included in the draft SIP support the conclusion that the Washington region will attain the ozone standard in 2005. Though the region plans to demonstrate the 2002 and 2005 Rates of Progress in advance of the November 15, 2005 EPA deadline, there is no indication that the region will attain the one-hour standard in advance of that deadline.

TOPIC: *Contingency Measures*

ID	Commenter	Comment	Response
Contingency-1	Sierra Club	The same measures cannot be used to meet the contingency requirements for the 2002 ROP, 2005 ROP and 2005 attainment demonstrations. If the area fails to meet both the 2002 and 2005 ROP milestones, it will need an additional 6% reduction in emissions.	<p>EPA guidance explains that if contingency measures are not implemented, states may designate those same measures as contingency measures for successive plans. If contingency measures are implemented, states are allowed 12 months to identify new measures to take the place of those which were implemented. MWAQC and the states have no indication that implementation of the 2002 contingency measures will be required. As a result, it is acceptable to designate the same contingency measures to fulfill the 2002 and 2005 requirements. See EPA "Guidance on the Post-1996 Rate of Progress Plan and Attainment Demonstration", February 18, 1994, Section 5.6.</p> <p>EPA first put forth EPA's rationale for the 3 percent requirement in section III.A.3.(c) "Contingency Measures" of EPA's April 16, 1992, "State Implementation Plans; General Preamble for the Implementation of Title I of the Clean Air Act Amendments of 1990; Proposed Rule" (see 57 FR 13510-13512). Should EPA inform MWAQC and the states after November 15, 2005 that the region must implement contingency measures in excess of those identified, those parties will immediately undertake efforts to identify and implement the required reductions.</p>

Contingency-2 Sierra Club

Please explain how the states can quantify a contingency benefit from Phase II RFG in the year 2000 when the draft plan states on page 7-41 that it is difficult to isolate credit from any one mobile source control program.

Calculation of the benefits of various mobile source control measures using MOBILE6 is complicated and time-consuming, due to the interaction between various federal and state programs. However, MWAQC and the states have received guidance from EPA on determining the incremental benefit of the Phase II RFG program after 1999. Using this guidance, MWAQC and the states have prepared a very conservative estimate of the benefits of the Phase II RFG program in 2000. This conservative estimate still shows program benefits in excess of the 13.0 tons per day VOC required for the 1999 contingency measure. As a result, the Phase II RFG program fulfills the 1999 contingency measure requirement. Further details of this analysis are included in Appendix I.

In addition to Phase II RFG, the Washington region has also implemented a number of VOC control measures that could serve as contingency measures for the 1996-1999 rate-of-progress and the 1999 failure to attain. A combination of either control measures 7.4.11 (OTC Portable Fuel Containers) and 7.4.12 (OTC AIM Coatings) or measures 7.4.12 and 7.4.14 (OTC Solvent Cleaning) could fulfill the requirement of 13.0 tpd VOC. All of these control measures will be effective by January 2005.

TOPIC: Control Measures

ID	Commenter	Comment	Response
Control-1	Environmental Defense, Washington Regional Network for Liveable Communities, Sierra Club Maryland Chapter, Virginia Bicycling Federation, Mary Halnon et al.	Commenter supports the OTC consumer products measure.	MWAQC and the states agree that the OTC measures are an essential component of this air quality plan.
Control-2	Environmental Resources Trust, Debra Jacobson	Commenter elaborated on the methodology employed by Resource Systems Group/Environmental Resources Trust in the report prepared for Clipper Wind Power. Commenter requests that this information be included in the final SIP.	MWAQC and the states agree that this information further clarifies the methodology used to calculate emission reductions from wind power purchases. This information has been included in Section 7.6.

Control-3	Environmental Resources Trust, Debra Jacobson	Commenter requests that the SIP contain a more detailed explanation of the linear interpolation method used to estimate the benefit of the Arlington County wind purchase. Commenter requests that the SIP include an explanation of the strong analytical basis for this interpolation.	MWAQC and the states agree that a more detailed explanation would be beneficial, and have made such changes in Section 7.6.
Control-4	Environmental Resources Trust, Debra Jacobson	Commenter provided material on the avian impacts of wind turbine operation and requests that this material be included in the SIP.	As no concerns have been voiced to MWAQC or the states regarding the avian impacts of the region's wind power purchases, MWAQC and the states do not plan to include this information in the SIP.
Control-5	Environmental Resources Trust, Debra Jacobson	Commenter believes that the proposed regional wind power purchase is an excellent application of the EPA stationary source voluntary measures policy.	MWAQC and the states believe that the proposed regional wind power purchase is consistent with EPA guidance for implementation of voluntary measures.
Control-6	Environmental Resources Trust, Debra Jacobson	Commenter believes MWAQC and the EPA should place renewable energy on equal footing with end-of-the-pipe pollution controls.	MWAQC and the states support renewable energy as an important means of reducing emissions. The pollution control measures within the SIP provide greater reductions than the reductions currently available from the identified renewable measures. MWAQC and the states may consider implementing additional renewable energy projects as part of a future SIP revision. MWAQC and the states have no jurisdiction over EPA policy.
Control-7	Environmental Resources Trust, Debra Jacobson	Commenter believes it is important for MWAQC to take a leadership role in promoting wind energy in the Mid-Atlantic region.	MWAQC and the states support renewable energy as an important means of reducing emissions.
Control-8	Northern Virginia Transportation Alliance	Curbing pollution sources in the Ohio Valley would reduce transport and improve air quality.	MWAQC and the states agree that regional transport of ozone is a significant problem. MWAQC and the states support EPA efforts to require emission reductions in regions whose pollution is transported into the Washington region.
Control-9	Northern Virginia Transportation Alliance	More can be done to encourage individuals and businesses to reduce emissions on Code Red days.	There are significant existing efforts to encourage regional participation in these programs. Clean Air Partners (www.cleanairpartners.net) is a regional organization devoted to public education and outreach for air quality issues. With the support of MWAQC and the states, Clean Air Partners continues to provide information on and recruit participants for its Ozone Action Days programs. MWAQC and the states agree that the region would benefit from increased participation in Ozone Action Day programs and they continue to encourage more citizens and business leaders to participate.

Control-10	Northern Virginia Transportation Alliance	The mobile source sector is carrying much of the load for emission reductions in the SIP.	Reductions from the mobile sector account for approximately 22% of NO _x and 38% of VOC reductions in the draft SIP, while point source reductions account for 2% of VOC reductions and 71% of NO _x reductions. The bulk of mobile source reductions are technology driven; very few stem from regional travel demand policies. MWAQC and the states do not believe that a disproportionate burden is placed on the mobile sector. They believe that at this time, the measures identified in the draft SIP are the most practical measures available for reducing emissions in the Washington region.
Control-11	Northern Virginia Transportation Alliance	Stalled traffic is a major source of air pollution. Adding more highways, bridges and transit capacity would reduce pollution.	The primary benefit of roadway construction is congestion mitigation, not emissions reduction. MWAQC and the states believe that the measures included in the draft SIP are the most practical measures available for reducing emissions in the Washington region at this time. However, they strongly support increases in regional transit capacity and may consider implementing such measures in a subsequent SIP revision.
Control-12	Wind Powering America (US DOE), Environmental Resources Trust, Deborah Jacobson	Commenter supports consideration of wind energy purchases as a means of promoting clean air in Metropolitan Washington region.	MWAQC and the states support wind power and the rest of the voluntary measures package as an effective means of reducing emissions through local actions. MWAQC will continue to support the development of innovative voluntary measures as a means for improving air quality in Metropolitan Washington.
Control-13	Roger Diedrich	Approval of transportation plans and projects should be linked to adoption of land-use measures that will reduce VMT and vehicle trips.	While MWAQC and the states believe that transportation and air quality are linked, the purpose of the SIP is to develop a regional air quality plan rather than a transportation plan. The SIP is developed in accord with a conformity process ensuring that new transportation projects successfully show they will not increase pollution levels beyond acceptable levels. Approval of transportation plans is the responsibility of the National Capital Region Transportation Planning Board (TPB), a separate regional planning body. MWAQC and the state air agencies are not authorized to prepare or approve regional transportation plans.
Control-14	North Old Town Independent Citizens Association	Commenter believes that BACT regulations limiting fine particulate matter from major stationary sources should be included in the SIP. Commenter is concerned about emissions from the Mirant Potomac River plant.	MWAQC and the states agree that fine particulate emissions are an area of concern for the Metropolitan Washington region. However, this air quality plan is designed to reduce ground level ozone only. EPA will designate nonattainment areas for fine particulate matter in December 2004.
Control-15	Alexandria Air Quality Committee, League of Women Voters of Alexandria	Commenter believes that the SIP should include measures to reduce emissions of fine particulates.	MWAQC and the states agree that fine particulate emissions are an area of concern for the Metropolitan Washington region. However, this air quality plan is designed to reduce ground level ozone only. EPA will designate nonattainment areas for fine particulate matter in December 2004.

Control-16	League of Women Voters of Alexandria	Commenter expressed concern about the cap and trade program which allows the coal burning plant located on the Alexandria waterfront to exceed its permitted levels by trading with other plants.	The Potomac River plant to which the commenter refers is subject to a strict permit limit imposed by the Virginia DEQ. The plant is not allowed to trade with other plants in order to meet its permit limit. DEQ is beginning enforcement action against this plant due to permit violations.
Control-17	League of Women Voters of Alexandria	Commenter supports passage of a Clean Smokestacks Act in Virginia, requiring all power plants to meet the most recent pollution control standards.	MWAQC and the states support the development of measures to reduce regional emissions. However, passage of the Clean Smokestacks Act is dependent upon the will of the Virginia Legislature.
Control-18	League of Women Voters of Alexandria	Commenter supports the identification of measures to reduce air pollutant transport and sanctioning states and/or plants that do not comply.	MWAQC and the states support the development of measures to reduce regional emissions. They agree that regional transport of ozone is a significant problem. MWAQC and the states support EPA efforts to require emission reductions in regions whose pollution is transported into the Washington region.
Control-19	Alexandria League of Women Voters	Commenter supports Del. Marian Van Landingham's amendment to Article 1, Chapter 13 of Title 10.1, Section 10.1-1322.5 relating to severe nonattainment areas that will be introduced in the 2004 Virginia legislative session.	Del. Van Landingham's proposal would require NOx and SO2 reductions from all power generators located in Virginia's severe nonattainment areas. MWAQC and the states support the development of measures to reduce regional emissions. However, passage of Del. Van Landingham's proposal is dependent upon the will of the Virginia Legislature.

TOPIC: *Emission Inventories*

ID	Commenter	Comment	Response
Inventory-1	Sierra Club	Table 7-4 shows 174.74 tons of 2002 NOx point source reductions in Maryland. Have these reductions occurred, and if so what is the basis for this conclusion?	The Maryland NOx reductions were based on real reductions at sources affected by the NOx RACT and NOx Budget and SIP Call requirements. The majority of the reductions of NOx for 2002 and 2005 for the Budget and SIP Call were based on the NOx allowance "cap" allocated to specific affected trading sources, under current Maryland regulations. While the Budget and SIP Call programs allow the "trading" of allowances to maintain the "cap", EPA ROP guidance requires that emission reductions under these programs are not to be allocated to specific sources and that allowance trading within the OTR to maintain a "cap" for a source is equivalent to the net reduction taken in the SIP.

Inventory-2	Sierra Club	<p>Tables 4-1 and 4-2 show a uniform growth factor for gas use throughout the region. What is the basis for assuming uniformity? Greater VMT growth in the suburbs would appear to require higher growth factors for gas use in the suburbs than in the District.</p>	<p>Forecasted gasoline use in Tables 4-1 and 4-2 is not used to predict trends in mobile emissions; it is used only to predict evaporative emissions from transportation and storage of gasoline. The gasoline use factor is based on predicted gasoline sales growth. Predicting growth by county would be difficult as gasoline sales are not directly correlated with VMT. Motorists may fill their tanks in one county but drive most of their miles in another. As a result, attempts to predict gasoline use trends at the county level would be unreliable, and a regional sales forecast has been applied to each county.</p>
Inventory-3	Sierra Club	<p>Section 4-2 discusses offset provisions and point source growth. Were emissions offsets for point sources assumed in emissions growth projections? Because MWCOC cannot know in advance when sources will need offsets, there is no basis for assuming any offsets in the growth projections.</p>	<p>Projections of stationary source emissions growth were developed using the EGAS model. This model incorporates current emissions levels and estimates of economic growth to predict future emissions. The model does not attempt to predict construction of new sources or the creation of emissions offsets. Therefore, offsets are not assumed in regional growth projections.</p>
Inventory-4	Sierra Club	<p>The plan makes repeated references to "uncontrolled" emissions. Please explain what is meant by this term. Does the 2002 uncontrolled emissions inventory reflect projected 2002 emissions assuming no controls beyond those effect in 1990? How are uncontrolled and controlled emissions calculated, i.e. what different assumptions are made in developing these numbers?</p>	<p>The commenter is correct in his interpretation of the difference between the uncontrolled and controlled inventories. An uncontrolled inventory calculates what emissions would be in a given year were there no emission controls beyond those in effect in 1990. A controlled inventory reduces the uncontrolled inventory by the reductions from emission controls implemented between 1990 and the inventory year.</p>
Inventory-5	Sierra Club	<p>In crediting emission reductions toward the 2002 and 2005 ROP targets, did MWCOC exclude emission reductions from a) RACT corrections required by Section 182(a)(2)(A) of the Act and I/M requirements mandated by Section 182(a)(2)(B) of the Act? If so, please indicate where these exclusions are documented in the plan.</p>	<p>RACT corrections were excluded as shown in Chapter 5 (page 5-6) and Appendix F (page F-4) of the draft. I/M requirements mandated by Section 182(a)(2)(B) were excluded by virtue of their inclusion in the 1990 baseline mobile inventory. The I/M program parameters assumed in calculation of the 1990 baseline are documented in Appendix B (page B-25). Additionally, reductions resulting from corrections of any deficiencies in the 1990 I/M programs are not credited. The adjustment is performed through the inventory adjustment process as discussed in Chapter 5 on the draft (Section 5.2.1 and page 5-4).</p>
Inventory-6	Sierra Club	<p>Table 7-6 shows 26.03 tons in NOx point source reductions in Virginia. Have these reductions occurred, and if so what is the basis for this conclusion? Table 7-7 predicts 45.34 tons per day in NOx point source reductions for Virginia in 2005. Please indicate when these reductions will actually occur and the regulations or permits containing the deadlines for such reductions.</p>	<p>The NOx point source reductions shown in Table 7-6 of the draft SIP are enforced through permit limits. All sources listed in Tables 7-6 and 7-7 hold permits consistent with the emission levels indicated. Data obtained by VDEQ indicates that one source listed in Tables 7-6 and 7-7 is emitting in excess of its permit limit. VDEQ is currently pursuing enforcement action against that source. DEQ expects the source's emissions to be consistent with permitted levels when the region demonstrates the 2002 ROP in January 2005.</p>

Inventory-7	Northern Virginia Transportation Alliance	Mobile emission control measures included in the SIP resulted in significant mobile emission reductions from 2002 to 2005 and are expected to result in continued reductions through 2015.	MWAQC and the states agree that estimated mobile emissions decreased from 2002 to 2005. They agree that current projections predict the continuation of this trend through 2015. The bulk of mobile source reductions are technology driven; very few stem from regional travel demand policies.
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TOPIC: Other

ID	Commenter	Comment	Response
Other-1	Sierra Club	MWCOG must quantify the potential emission reductions achievable with each of the Gold Book measures.	The intent of the Gold Book is to encourage and provide information about local emission reduction projects that do not yield easily quantifiable benefits. This document is not part of the Washington region's draft SIP and was not included in the formal public hearing process. As a result, MWAQC and the states are under no obligation to quantify the benefits of these programs. It is hoped that the Gold Book will encourage new measures, outside the SIP, to improve air quality. As accurate methodologies are developed for quantifying these innovative measures and local programs are permanently funded and fully implemented, MWAQC expects to work towards quantifying the emission reductions associated with these programs.
Other-2	Virginia Bicycling Federation	Though much of the Washington region's pollution is transported in from power plants in the Ohio River Valley, the Washington region's emissions are transported northeast to the Baltimore region and beyond.	MWAQC and the states agree that regional transport of ozone is a significant problem. Regional attainment of the one-hour ozone standard is important not only for the health of citizens in the Washington region, but also for the health of citizens in regions downwind of Washington.
Other-3	Randy Mardres	The lack of a strong, comprehensive, well-coordinated, multi-jurisdictional strategy for significantly reducing emissions is a reason for the slow progress in air quality improvement.	The draft SIP was prepared by MWAQC, a multi-jurisdictional regional organization composed of representatives from 20 counties and cities and the legislatures, air agencies and transportation agencies of the District of Columbia, Maryland and Virginia. It contains a regionally-coordinated strategy for reducing emissions in the Washington DC-MD-VA nonattainment area. MWAQC and the states disagree that there has been slow progress in improving the region's air quality. From 1990 to 2005, the region will have eliminated over 214 tons of daily VOC emissions and over 393 tons of daily NOx emissions.
Other-4	Randy Mardres	Bicycle access to mass transit is problematic, as MARC trains do not accommodate bicycles.	Some transit agencies provide excellent bicycle access. WMATA, for example, permits bikes in railcars and has installed bikeracks on buses. However, MWAQC and the states also agree that bicycle access to mass transit could be improved, and they encourage transit authorities to consider bicyclists' needs when purchasing new equipment.

Other-5	Sierra Club	Commenter incorporates by reference prior comments contained in letters dated March 24, 2003, July 7, 2003 and July 8, 2003.	MWAQC and the states incorporate by reference their responses to these comments as published in Appendix K of the Washington region's August 13, 2003 "Plan to Improve Air Quality in the Washington DC-MD-VA Region".
Other-6	Air Transport Association	ATA incorporates by reference its comments of July 8, 2003.	MWAQC and the states incorporate by reference their responses to these comments as published in Appendix K of the Washington region's August 13, 2003 "Plan to Improve Air Quality in the Washington DC-MD-VA Region".
Other-7	League of Women Voters of Alexandria	Commenter endorses the initiatives listed in the Air Quality Gold Book.	MWAQC and the states believe that the Gold Book is an important tool for supporting development of innovative emission reduction programs in the Washington region.

TOPIC: *Public Health*

ID	Commenter	Comment	Response
Health-1	Environmental Defense, Washington Regional Network for Liveable Communities, Virginia Bicycling Federation, Mary Halnon et al.	The SIP does not do enough to reduce air pollution and Code Red Days.	This SIP revision contains over 25 tons per day of new control measures that will enable the Washington region to reach attainment for the one-hour ozone standard, reducing the number of Code Red and Code Orange days and thus the threat to public health.
Health-2	League of Women Voters of Alexandria	Commenter requests the regional, city and state governments adopt strong standards for gases, mercury and particulate matter to protect public health and the environment.	<p>This SIP revision contains over 25 tons per day of new VOC control measures that will enable the Washington region to reach attainment for the one-hour ozone standard, reducing the number of Code Red and Code Orange days and thus the threat to public health.</p> <p>MWAQC and the states agree that it is important to address mercury and particulate matter emissions from stationary sources. However, this air quality plan is designed to reduce ground level ozone only. EPA will designate nonattainment areas for fine particulate matter in December 2004. In December, EPA proposed a utility mercury reductions rule that may help reduce mercury emissions from power plants in the Washington nonattainment area.</p>

ID	Commenter	Comment	Response
RACM-1	Sierra Club	All measures included in the Air Quality Gold Book draft released 12/23/2003 are RACM, except for those measures that are voluntary or episodic in nature. These measures include smart growth planning, locomotive and marine idling restrictions, tax incentives for hybrid vehicles, limitations on pesticide use, commuter choice, additional bus and rail purchases, government purchases of hybrid vehicles, cleaner burning diesel fuel, diesel retrofits, environmental performance contracting for diesel vehicles, parking management and reductions in airport emissions.	The measures listed by the commenter are already evaluated as part of the region's RACM determination and were determined not to meet the criteria described in Chapter 8 of the draft SIP. Smart growth planning is evaluated as L1, L2 and L4 in Appendix O. Locomotive idling restrictions is L1 in Appendix M. Marine idling is M2 in Appendix N. Tax incentives for hybrid vehicles are M2 and M6 in Appendix O. Limited pesticide use is X2 in Appendix M. Commuter choice is M4 and M9 in Appendix O. Bus and rail purchases are T11, T13, T14, T15, T22 and T24 in Appendix O. Government purchase of hybrid vehicles is A4 in Appendix O. Clean diesel fuel is W1-W3 in Appendix O. Diesel retrofits are A7 in Appendix O and A2, C2, G2, I2, R4, S3 and T2 in Appendix N. Environmental performance contracting is C6, G6, I7 and T6 in Appendix N. Parking management is E2, E7, M1, M8, M15, P1 and P2 in Appendix O. Reductions in airport emissions are A1-A2 and S1-S5 in Appendices M and N, respectively.
RACM-2	Air Transport Association	ATA supports the finding that no aviation-related control measures are reasonably available. These measures are neither cost-effective nor technically feasible, and many would be preempted under the Clean Air Act and federal aviation laws. Voluntary measures considered for the RACM determination would be infeasible given the current financial crisis within the industry.	MWAQC and the states agree that based on current data, no aviation-related measures are RACMs.
RACM-3	Air Transport Association	Potential RACM measure A1, "Airport Congestion Pricing" is rejected because it could not deliver emission benefits by 2004. This measure should also be rejected because it is preempted by federal law. Federal control in this area is intensive and exclusive. This should be reflected in the RACM determination.	MWAQC and the states are aware of questions surrounding the legality of airport congestion pricing, but because measure A1 was eliminated from consideration as a RACM for other reasons, the commenter's assertion is not germane to the outcome of the RACM analysis. Though many potential RACM failed several of the criteria detailed in Chapter 8, in each case only one reason for exclusion was listed. As a result, MWAQC and the states see no need to revisit the analysis to incorporate the commenter's assertion.

TOPIC: *Rate-of-Progress Demonstrations*

ID	Commenter	Comment	Response
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The 2002 Rate-of-Progress plan fails to comply with Sections 182(b)(1)(C) and (c)(2)(B) of the Clean Air Act because it relies on emission reductions that will not be achieved until well after 2002 and does not purport to achieve the 2002 ROP milestone until 2005. This section allows the crediting of emission reductions toward ROP milestones only "to the extent they have actually occurred" as of the milestone date.

The Clean Air Act requires states to submit plans that demonstrate rate of progress every three year period from 1996 until the region's attainment date. The Washington region was originally assigned an attainment date of 1999, meaning that the region needed to demonstrate rate of progress for the period 1996-1999 only. This demonstration was submitted in December 1997 and amended in May 1999. On July 2, 2002, a decision by the US District Court of Appeals vacated EPA's approved of the Washington regions one-hour attainment demonstration. In response to that decision, EPA notified the states of its intention to reclassify the Washington region as a severe area, with an attainment date of 2005. This reclassification expanded the region's obligations with respect to rate of progress, requiring the region to complete demonstrations for the periods 1999-2002 and 2002-2005.

Though the states began work immediately to prepare the plans, due to the magnitude of the task states could not identify and implement the necessary control measures before the deadline for the 2002 rate of progress passed. Furthermore, EPA's final notice of reclassification was not published until January 24, 2003, more than two months after the deadline for demonstrating the 2002 rate of progress. EPA's reclassification notice stated that because the statutory deadline for rate of progress had passed without the states receiving legal notice of a requirement to perform the demonstration, EPA was exercising its discretion under Section 182(i) to adjust the submission deadline to March 1, 2004, as discussed in the Agency's final reclassification notice. The Court of Appeals for the D.C. Circuit upheld the March 1, 2004 submittal deadline by concluding that EPA's use of Section 182(i) was not unlawful.

Given that the SIP was not due until after the 2002 milestone had elapsed, it was quite possible that the states could not demonstrate the 9 percent reduction requirement by 2002. EPA has addressed similar issues on several occasions when the date for achieving progress had passed prior to EPA action on a progress SIP. EPA has routinely concluded in these circumstances that the area should demonstrate the required ROP as expeditiously as practicable once the statutory date for achieving such ROP had passed. See, e.g., 65 FR 31485 (May 18, 2000), 63 FR 28898 (May 27, 1998), 62 FR 31343 (June 9, 1997). In the January 24, 2003, reclassification notice EPA stated that the statutory deadline for rate of progress had passed without the states receiving legal notice of a requirement to perform the demonstration. Thus in accordance with past practice, EPA allowed the District, Maryland and Virginia to demonstrate that the 2002 ROP reduction is achieved as expeditiously as practicable after November 15, 2002, but in any case no later than November 15, 2005. As the achievement of all 2002 ROP requirements by January 2005, as demonstrated in the draft SIP,

ensures that all required reductions will have occurred in advance of the revised milestone date of November 15, 2005, the draft SIP does comply with Sections 182(b)(1)(C) and (c)(2)(B) of the Clean Air Act.

The States believe that as of November 15, 2002, the ROP plan for 2002 had a shortfall in VOC emission reductions only. This shortfall amounted to 24.7 tons per day. The plan had sufficient NOx benefits projected from current measures in the approved SIPs or from EPA rules. Because the plan substitutes a full nine percent of NOx reductions for the 2002 target level, NOx benefits from any measure identified in the RACM analysis would not address the 2002 ROP shortfall because substituting additional NOx reductions will not help. In the case of the post-1996 ROP plan for the 2002 milestone year, the “as soon as practicable” determination becomes a comparison between the three “OTC” measures (measure numbers 7.4.11, 7.4.12 and 7.4.14 in Table A), 0.2 tpd of TCMs included in measure 7.5, and the voluntary measures bundle, measure number 7.6, of this plan in lieu of the other VOC measures considered in the RACM analysis that might have been sooner. These three “OTC” measures, the TCMs and the voluntary bundle will deliver 25.6 tons per day of benefits in the aggregate which is much more than the VOC benefits than the other VOC measures considered in the RACM analysis that might have been implemented sooner. Appendix H of the draft plan presents an analysis also supporting the plan’s date for the achievement of the first nine percent of post-1999 ROP reduction. The States believe that no other measure or bundle of measures would deliver in the aggregate anything close to the reductions achieved by the three “OTC” measures, the TCMs and the voluntary bundle. Therefore, the States conclude that these are the only measures that will meaningfully accelerate the date by which the first post-1999 ROP reduction will be achieved.

TOPIC: Severe Area Requirements

ID	Commenter	Comment	Response
SevReqs-1	Dominion	Since the implementation of the Section 185 penalty fee is not required until the year following a failure to attain, it is not necessary for Virginia to establish specific rules to implement Section 185 fee provisions this year.	In its 2/3/04 decision of Sierra vs. EPA, the U.S. Court of Appeals for the D.C. Circuit upheld EPA's requirement that all components of the region's severe area SIP, including the Section 185 fee penalty, must be adopted and submitted by March 1, 2004. In order to have an approvable SIP, Virginia must adopt a Section 185 program this year.

SevReqts-2 Dominion

There is a possibility that the Section 185 fee requirement will be eliminated if EPA revokes the 1-hour standard or the Barton amendment of the Energy Policy Act of 2003 passes and EPA's reclassification of the Washington area to severe is revoked. As a result, the commenter urges Virginia to use the more general language used by Maryland with respect to the Section 185 fee penalty requirements, stating that Virginia will enact the Section 185 program "through legislation or other options provided for in EPA rules and guidance" without specifically committing to the proposal or adoption of legislation in 2004.

In its 2/3/04 decision of *Sierra vs. EPA*, the U.S. Court of Appeals for the D.C. Circuit upheld EPA's requirement that all components of the region's severe area SIP, including the Section 185 fee penalty, must be adopted and submitted by March 1, 2004. In order to have an approvable SIP, Virginia must adopt a Section 185 program this year. Virginia believes that a Section 185 program can only be established through legislation or regulation, and the state regulatory process cannot be completed in the required time frame.

SevReqts-3 Dominion

Because Dominion has already significantly reduced its emissions through a coal-to-natural gas conversion at the Possum Point power station, the requirement to either reduce emissions by an additional 20% or pay a fee penalty would be a significantly unfair burden to Dominion relative to other stationary sources that have not already reduced emissions. For this reason, we request that DEQ allow for as much flexibility as possible in implementation of the fee. We believe that DEQ can accomplish this by deferring legislative measures until it has provided potentially affected sources the opportunity to discuss options through a stakeholder process.

In its 2/3/04 decision of *Sierra vs. EPA*, the U.S. Court of Appeals for the D.C. Circuit upheld EPA's requirement that all components of the region's severe area SIP, including the Section 185 fee penalty, must be adopted and submitted by March 1, 2004. In order to have an approvable SIP, Virginia must adopt a Section 185 program this year. Therefore, deferral of legislative measures is not a possibility.

ID	Commenter	Comment	Response
TCM-1	Environmental Defense, Washington Regional Network for Liveable Communities, Sierra Club Maryland Chapter, Virginia Bicycling Federation, Mary Halnon et al.	The SIP should contain additional state or local measures to reduce driving, such as smart growth measures, parking impact fees, enhanced bicycle and pedestrian facilities, transit-oriented development, and exclusive bus lanes.	The draft SIP contains a few transportation control measures (TCMs) designed to reduce vehicle trips and vehicle miles traveled. See Appendix G of the SIP for more information. Mobile emission inventories incorporate the effects of regional transit service. MWAQC and the states may consider implementing additional measures of this type in a future SIP revision. In addition to the proposed TCMs, many more programs have been implemented in the Washington region through Commuter Connections (www.commuterconnections.com), administered by the Council of Governments, and as part of Transportation Improvement Plans (TIPs) prepared by the National Capitol Region Transportation Planning Board (TPB). Information on regional TIPs is available at http://www.mwcog.org/transportation/activities/clrp/ .
TCM-2	Environmental Defense, Washington Regional Network for Liveable Communities, Sierra Club Maryland Chapter, Virginia Bicycling Federation, Mary Halnon et al.	The SIP should include additional control measures mentioned in the MWAQC Gold Book, such as parking cash-out, procurement of additional buses and rail cars, transit bus queue jumps, accelerated universal acceptance of the SmarTrip card, a safe routes to school program, live-near-your-work programs and better managed parking supply and pricing.	Control measures for the draft SIP were chosen from a large group of measures compiled from past SIP efforts, public comments and information on measures considered by other regions. MWAQC and the states believe that at this time, these are the most practical measures available for reducing emissions in the Washington region. The Gold Book represents a set of emissions-reducing measures under development in the region. In the judgment of MWAQC and the states, these measures are not yet ready for inclusion in the SIP due to difficulties in quantifying benefits or implementing programs. However, they continue to contribute to improvements in the region's air quality. MWAQC is actively pursuing development of these and other measures and hopes to include them in a future SIP revision.
TCM-3	Environmental Defense	Commenter applauds inclusion of previously implemented TCMs such as Arlington County and DC bike lanes and trails, DC bicycle parking, bike racks on buses, CNG Metrobuses, and sidewalk improvements in Fairfax City.	MWAQC and the states support these measures as an effective means of reducing emissions. MWAQC will continue to encourage the development of transportation control measures as a means for improving air quality in Metropolitan Washington.

TCM-4	Mike Hathaway, Betsy Johnson	Cars and trucks are responsible for approximately 45% of NOx emissions and 30% of VOC emissions in the DC area. Despite this, the plan contains no new measures to reduce driving.	<p>When identifying control measures, MWAQC and the states considered all measures appropriate and required for an approvable SIP. Many mobile source control measures included in the SIP are technology-based and will be phased in over time. More stringent emission standards for passenger cars and diesel trucks and low-sulfur gasoline and diesel requirements will provide additional mobile emission reductions for many years.</p> <p>The draft SIP also contains a few transportation control measures (TCMs) designed to reduce vehicle trips and vehicle miles traveled. See Appendix G of the SIP for more details. MWAQC and the states may consider implementing additional measures of this type in a future SIP revision. Carpooling and vanpooling coordination in the Washington region is currently implemented through Commuter Connections (www.commuterconnections.com), administered by the Council of Governments, and as part of Transportation Improvement Plans (TIPs) prepared by the National Capitol Region Transportation Planning Board (TPB). Information on regional TIPs is available at http://www.mwcog.org/transportation/activities/clrp/.</p>
TCM-5	Northern Virginia Transportation Alliance	TCMs that cannot be achieved with absolute certainty should be rejected.	MWAQC and the state transportation agencies are confident in their ability to effectively implement all TCMs included in the draft SIP.
TCM-6	Randy Mardres	It is unclear whether the implementation of many of the TCMs in Appendix G, e.g. construction of park and ride lots, will improve air quality.	Significant analysis has been undertaken to ensure that all emission control measures included in the SIP will indeed reduce emissions. Appendix G documents the analysis undertaken for construction of park and ride lots and other TCMs.
TCM-7	Randy Mardres	Some proposed transportation projects that would improve air quality, such as the Silver Spring Bicycle Transit Center, are not on the TCM list.	The draft SIP contains a few transportation control measures (TCMs) designed to reduce vehicle trips and vehicle miles traveled. See Appendix G of the SIP for more information. Mobile emission inventories incorporate the effects of regional transit service. MWAQC and the states may consider implementing additional measures of this type in a future SIP revision. In addition to the proposed TCMs, many more programs have been implemented in the Washington region through Commuter Connections (www.commuterconnections.com), administered by the Council of Governments, and as part of Transportation Improvement Plans (TIPs) prepared by the National Capitol Region Transportation Planning Board (TPB). Information on regional TIPs is available at http://www.mwcog.org/transportation/activities/clrp/ .

TCM-8	Randy Mardres	The region should have a plan to increase bicycle commuting to the University of Maryland by 1%.	Control measures for the draft SIP were chosen from a large group of measures compiled from past SIP efforts, public comments and information on measures considered by other regions. MWAQC and the states believe that at this time, these are the most practical measures available for reducing emissions in the Washington region. MWAQC and the states may consider implementing this measure as part of a future SIP revision.
TCM-9	Virginia Bicycling Federation	TPB should develop a competitive grant process for spending the Washington region's CMAQ allocations as cost effectively as possible to accelerate progress towards clean air and reduce congestion.	The National Capital Region Transportation Planning Board (TPB) is a separate regional planning body. MWAQC and the state air agencies are not authorized to prepare or approve regional transportation plans or allocate CMAQ funds. Any comments on the CMAQ process should be submitted directly to the TPB or to the state transportation agencies.
TCM-10	Randy Mardres	The Maryland TCM plan does not pull its share of the weight to support the SIP or MWAQC.	TCMs are only a small part of the overall mobile emission reductions contained in the draft SIP. Control measures for the draft SIP were chosen from a large group of measures compiled from past SIP efforts, public comments and information on measures considered by other regions. MWAQC and the states believe that at this time, these are the most practical measures available for reducing emissions in the Washington region. The State of Maryland may consider implementing additional TCMs as part of a future SIP revision.
TCM-11	Randy Mardres	What does the bicycle and pedestrian facility TCM in Maryland mean? MSHA will not spend federal money on it.	The Maryland bicycle facilities TCM (MD-4) resulted in the installation of 1,000 bicycle racks in Montgomery, Prince George's and Frederick counties. MWAQC and MDE have no control over MSHA's budgetary process. Any comments regarding MSHA's budget should be addressed directly to that agency.
TCM-12	Randy Mardres	MSHA will spend highway enhancement money only on recreational, not transportation, bicycle projects. This creates pressure to build large parking lots near recreational trails instead of facilitating non-motorized access through communities.	MWAQC and the state air agencies strongly support projects that facilitate non-motorized access to communities. However, MWAQC and MDE have no control over MSHA's budgetary process. Any comments regarding MSHA's budget should be addressed directly to that agency.

ID	Commenter	Comment	Response
TechCorr-1	Sierra Club	Table A on page 1-2 is misleading because it shows emission reductions in the 1990-2002 column that will not be adopted until after 2002.	The 1990-2002 column label was intended to refer to the 2002 rate-of-progress demonstration rather than the calendar year 2002. MWAQC and the states agree that this is unclear. The columns will be relabeled and a footnote added to clarify the time period over which the reductions will occur.