

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).

April 21, 2007

Dear MWAQC:

This letter represents the response of the Air Quality Public Advisory Committee (AQPAC) to your solicitation for comments on the draft *State Implementation Plan (SIP) for 8-Hour Ozone Standard*, issued March 15, 2007.

Clearly, progress has been made in reducing ozone concentrations in the Washington DC, MD, VA region and we commend the States and the Metropolitan Washington Council of Governments for their considerable efforts over the last two decades. However, it is *extremely disappointing* that the models do not show that all the monitors will comply with the 8-hour ozone standard in 2009, thus requiring the SIP to rely on a weight of evidence approach to demonstrate compliance. This clearly indicates a lack of willingness by the States to take the final appropriate and necessary measures to meet the standard outright. Instead, the approach appears to have been to "just meet" the standard within the confines of EPA regulations and guidance, and not to exceed it with a sufficient margin of error and consideration of the health of the region's residents. Additionally, even with the weight of evidence, the 8-hour ozone SIP does not make a strong case that the region will comply (although it is certainly possible within the model's level of precision and the variation in seasonal weather).

For example, for this SIP and ones earlier, a very lengthy list of possible measures to be used as both control measures and contingency measures was provided by staff for consideration. Very few measures from this lengthy list were chosen, and only to meet a base tonnage reduction with no margin. It would seem prudent to exceed what is really needed to meet compliance as well as work towards greater improvement of air quality by involving those companies or organizations who are responsible for improving or changing their methods or products. While some excellent measures were taken—including reduction of many point source emissions, purchase of wind energy, increase of urban tree canopy, purchase of some low emission vehicles—other major source categories are inadequately addressed, including on-road transportation and area sources.

It must be noted that the Federal government did not take its full measure of responsibility to assist regions like ours, specifically in areas where Federal policy overrides local policy. Federal promotion of renewable energy sources and more stringent application of New Source Review would have further reduced air pollution in the region, possibly enough for all the monitors to meet the standard. Improvements to automobile fuel efficiency standards, which have been stagnant over the last two decades, would have greatly assisted the region in reducing air pollution in a time of rapid population growth. Reducing pollution from cars and trucks by

boosting their efficiency is a necessary and insufficient step towards adequate emission reductions from transportation. Washington DC, MD, VA would have also been assisted by improved travel demand models that account for trip and vehicle-miles-of-travel reduction due to differences in density, design and location of development and by reviewing and altering transportation plans and programs so that projects and incentives which reduce non-single occupant vehicle modes of travel receive priority. While we wish the States had done more, they were not fully supported by the Federal government in several key areas.

Please contact me if you have any questions concerning the AQPAC input to the 8-hour ozone SIP.

Sincerely,

Jill Engel-Cox, Ph.D.
AQPAC Chair

cc: AQPAC members
 Joan Rohlfs, COG