

Metropolitan Washington Air Quality Committee

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March 4, 2005

Mr. Bradley Mehaffy
Federal Aviation Administration (FAA)
Washington Airports District Office
23723 Air Freight Lane, Suite 210
Dulles, Virginia 20166

Dear Mr. Mehaffy:

Thank you for the opportunity to comment on the draft Environmental Impact Statement (*General Conformity Determination for New Runways, Terminal Facilities, and Related Facilities at Washington Dulles International Airport, December 14, 2004*).

The Metropolitan Washington Air Quality Committee (MWAQC) is the regional body responsible for air quality planning in the metropolitan Washington region on behalf of the states of Maryland, Virginia, and the District of Columbia. As the region is a nonattainment area for the 8-hour ozone standard as well as for the fine particle standard (PM_{2.5}), it is critical that all sources contributing to pollution make an effort to reduce their emissions. The States and MWAQC have begun the process of developing air quality plans to attain these health standards by 2010. We believe that meeting these new standards will be a difficult effort, requiring additional emissions reductions from sources in the region.

We have the following comments on the draft Environmental Impact Statement:

- 1) The air quality analysis indicates that there is a net decrease in emissions between the no-build and build scenarios and that project-related construction emissions are less than the SIP budget for Dulles.**

Comment:

This finding is difficult for the committee to accept due to growth in air traffic at Dulles resulting from the 2 new runways. The general conformity criteria set a very low standard for mitigation action in an area such as the Washington, DC region, which has prolonged and serious air quality problems. We understand that Dulles airport operations increased by 84 percent between 1990 and 1999. Projected operations in 2010 (the 8-hour ozone attainment year) are expected to be 130 percent above 1990 levels. Because emissions generally increase as operations increase, we urge that you use the latest assumptions and modeling tools to estimate pollution emissions from the airport operations as well as the proposed expansion projects.

- 2) EPA designated the Washington, DC-MD-VA region as nonattainment for PM_{2.5} in January 2005.**

Comment:

The EIS should be updated to include information for PM_{2.5}. Table 4.3.6-4 should include this information and Table 4.3.6-7 should include an assessment of PM estimates from each source. Also, please address whether the proposed action will worsen violations of the PM_{2.5} standard.

3) The 2005 emission estimates developed for the region's Severe Area 1-hour ozone SIP used a default mixing height of 3000 feet.

Comment:

The draft EIS used a lower mixing height (1412 to 1608 feet). Please provide an assessment of the impact that this change has on total operational emissions in 2010.

4) The draft EIS asserts that improvements to the airport will reduce aircraft taxi and gate delays and will help enable the region to meet projected demand for air travel in the coming years.

Comment:

The runways will also induce more growth at the airport than might have otherwise occurred. The increased airport capacity will enable an increase in the number of flights into the region, potentially contributing to transported air pollution from outside our region. The general conformity criteria set a very low standard for mitigation action in an area such as the Washington, D.C. region, which has prolonged and serious air quality problems. Since the aviation sector has lagged behind other industry sectors in reducing emissions where possible, we urge the Washington Airports Authority to actively work with the MWAQC Technical Advisory Committee (TAC) to find ways to contribute the aviation sector's fair share of emission reductions to the region.

5) A voluntary airport emissions budget in the region would be the best way to reduce airport emissions, contributing to meeting the region's 8-hour ozone standard and PM_{2.5} goals in 2010.

Comment:

We look forward to beginning a discussion of voluntary control measures that the region's airports could pursue to improve air quality in the metropolitan area. One initiative could be to develop a voluntary agreement to cap emissions at airports in the Washington, DC region. Similar approaches have been implemented at Boston's Logan Airport, Texas, and Los Angeles. We urge the FAA to join us in these efforts.

EPA has been working on amendments to the General Conformity rule that would provide incentives to airports that volunteer to work with air quality agencies to reduce emissions. One such proposed incentive is that any airport accepting a voluntary airport emissions budget could complete improvement projects without an EIS or general conformity analysis as long as the emissions with the project remained within the voluntary emissions budget. The voluntary airport emission budget program is an approach that the MWAQC Technical Advisory Committee regards as the best way for the Dulles airport to help the region meet its goal of attaining the 8-hour ozone standard by 2010.

Thank you for the opportunity to comment on the draft General Conformity Determination. We look forward to working closely with you on making further improvements to the region's air quality for meeting the new health standards.

Sincerely,



Hon. T. Dana Kauffman, Chair
Metropolitan Washington Air Quality Committee

CC: David Stonefield, U.S. Environmental Protection Agency
James E. Bennett, Metropolitan Washington Airports Authority