

# 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).**

September 22, 2008

Honorable Michael Knapp  
Chair, Board of Directors  
Metropolitan Washington Council of Governments  
777 North Capitol St NE, Suite 300  
Washington, DC 20002

Dear Mr. Knapp:

The Air Quality Public Advisory Committee is pleased to offer comments on the draft National Capital Region Climate Change Report. While we have some suggestions for improvement, we believe that this report is needed to inform the residents of our region and to inform the actions that will be needed.

General Comments:

- The report highlights a number of important actions that have been initiated that will help reduce the impact of greenhouse gases if the plans outlined are indeed implemented. In order to promote Smart Growth, including appropriate adjustments to land use planning, public support will be needed. We believe that public involvement and outreach will be important to the successful implementation of these actions and recommend that public involvement play a prominent role in the process.
- The AQPAC is supportive of the report's recommendations 1) that the Council of Government's regional climate change initiative should continue; and 2) proposed governance structure for ongoing COG climate change initiative be adopted.
- The report should explain the sources and significance of different greenhouse gases early in the report. If additional steps are needed to control other greenhouse gases, then those steps should be discussed. If additional research is needed to address this point, then the report should say so.
- The report appears weak in the area of public education and outreach. Efforts to reduce the emission of greenhouse gases will benefit from individual actions. Residents of the area must appreciate that they have an opportunity to make a difference and support regional efforts to reduce the emissions of greenhouse gases.

We recommend workshops and public outreach will be important to gain public support.

- We look forward to the next iteration of this analysis, which should include not only estimates of greenhouse gas reductions due to specific measures, but also analysis of the synergies or tensions between the measures. For example, a jump in efficiency of vehicles is likely to yield a rebound effect, stimulating more travel and cutting into any measures designed to reduce vehicle miles traveled. On the other hand, should revenues from road pricing be directed to improving transit service these measures should complement one another, yielding a larger overall result vis-à-vis travel demand management.

#### Specific Comments:

The need to adopt fuel economy standards for heavy trucks is mentioned several times in the document, despite the fact that Congress has already mandated that DOT adopt such standards in last year's energy bill (the Energy Independence and Security Act of 2007). This should be corrected.

There are some creative economic incentives missing from the list of possible measures, specifically road pricing (tolling, congestion pricing) and decoupling, and measures covering aviation and intercity rail. These should be considered as part of the mix.

The graph on p. 17 is illegible and should take up a whole page or otherwise made understandable.

The risk of rapid, catastrophic climate change is not mentioned (p. 21). While it is improbable the consequences would be grave enough that it deserves mention.

The figure on p. 21 needs labeling to make it readable.

On p. 32, location of businesses and residences is listed as a measure that would prove immediately effective. This may be the case for imminent construction, but there is likely to be a time lag and that should be noted.

On p. 42, it should be noted that the region would benefit if Virginia would adopt a mandatory (not merely voluntary) plan similar to its sister jurisdictions.

On p. 51, it may be useful to include a projection of benefits of CAFÉ should it continue to improve beyond 35 mpg beyond 2020. The current assumption is that improvement will continue as required to 2020 and then remain static thereafter. The new statute, however, requires that the bar be moved up to the "maximum feasible" level after model year 2020. The plan should note the benefits for the region should the letter of the law be followed and improvements continue after the specified 35 mpg by 2020 mandate.

On p. 52, it is unclear whether teleworking would be taken up by public sector, private sector, or both.

On p. 68, another group deserves mention: NRDC (Natural Resources Defense Council).

On p. 76, the text should be updated since it states that the financial picture will become clearer by the summer and we are now in the fall.

Re pages: 51-52: the transportation representatives (VDOT) said the report should use numbers from the TPB analysis of what level of gasoline mileage efficiency is needed to support the reduction goal. (TPB says its 168 mpg). This section also notes that the California LEV could further reduce emissions, which is an important point.

Re: page 53: Land use choices, especially those that locate people close to public transit, should reduce overall emissions. We suggest that efforts of different jurisdictions to support land use choices that will locate people closer to transportation corridors should be highlighted.

Page 8, 2<sup>nd</sup> paragraphs: We suggest that the heading “*Strategy to Modify Energy-Consuming Behaviors*” be suggested it be changed to “Strategy to Provide Energy Conservation Incentives.” We believe that it is important to emphasize the importance of individual actions to reduce emissions. We have a substitute paragraph below:

*Strategy to Energize and Incentivise Energy Conservation Energizing households and businesses to make energy conserving choices offers a potentially significant impact for greenhouse gas reductions. Individuals and businesses can make simple choices to conserve energy by their driving, purchasing, heating and cooling in the home and workplace and lessening the amount of trash disposal. Opportunities for education and outreach that provide reasons to make changes include educating consumers to purchase wisely, recycle more, and throw away less. Helping business consumers, government consumers, and household consumers to purchase more energy-efficient cars, appliances, heating and air conditioning technologies and to look for alternatives that consume less energy, are lasting or reusable is a shared responsibility. Providing the information, education and insistence that consumer products are safe and sound, businesses, governments, and households can work together to do their part for reducing greenhouse gases.*

While we believe these comments to be important, we also believe that this document will be one of the most significant air quality products ever produced for our region. We commend you for your vision and leadership to develop such a

document. We stand ready to support you in developing plans for implementation and outreach.

Again we appreciate the opportunity to serve the MWAQC by providing our comments on this important report.

Sincerely,

Deron Lovaas, Chair

cc: The Honorable Nancy Floreen, Chair, CCSC;  
The Honorable David Snyder, Chair, MWAQC