



February 17, 2010

Technical Advisory Committee	Agenda Item 4
Consider recommending to the Transportation Policy Board comments to EPA's proposed revisions to the federal ozone standard	

On January 6, 2010, the US Environmental Protection Agency (EPA) proposed revisions to the primary and secondary federal ozone standards. EPA is proposing to set the primary standard in a range between 0.060 to 0.070 parts per million (ppm), lower than the 0.075 ppm standard set in 2008. The primary standard retains the 3-year average format. For the secondary standard, EPA proposes a new, seasonal format set in a range between 7 and 15 ppm-hours annually and averaged over 3 years. Previously, the secondary standard has been identical to the primary standard.

The primary standard is set to protect public health, while the secondary standard is set to protect public welfare, including plants, crops and ecosystems. EPA's science advisory committee recommended setting the standards in the range and formats described in order to adequately protect public health and welfare with a margin of safety.

The region's regulatory monitors are located in Travis County. Based on 2007-2009 monitoring data, the region measures 0.075 ppm for the primary standard. Based on 2006-2008 data, the region measures 8 ppm-hours for the secondary standard. Nonattainment designations are expected to be based on 2008-2010 monitoring data.

The public comment period is open until March 22, 2010. EPA is particularly interested in comments addressing where, within the 0.060 - 0.070 ppm range, the primary standard should be set. Draft comments for consideration are included in attachment A.

RECOMMENDATION:

The TAC recommends the draft comments to the Board for submittal to EPA during the public comment period.

Staff Contacts: Cathy Stephens, 974-1861, cathy.stephens@campotexas.org
Shana Norton, 974-3458, shana.norton@campotexas.org



DRAFT CAMPO Comments on EPA Proposed Ozone Standard

The Capital Area Metropolitan Planning Organization (CAMPO) is grateful for the opportunity to comment on the U.S. Environmental Protection Agency (EPA) proposed update of the National Ambient Air Quality Standards (NAAQS) for ground-level ozone (O₃). As the region's Metropolitan Planning Organization, CAMPO coordinates long-range transportation planning within the five-county Austin-Round Rock Metropolitan Statistical Area (MSA). CAMPO balances environmental stewardship and transportation planning through active participation in the MSA's voluntary ozone reduction initiatives. CAMPO supports these initiatives by dedicating staff resources, conducting technical analyses, funding transportation emission reductions measures and conducting public outreach programs.

CAMPO wholeheartedly supports setting the O₃ standard at a level fully protective of public health and welfare. Based on EPA's Clean Air Scientific Advisory Committee (CASAC) independent review a primary standard of up to 0.070 parts per million (ppm) meets the Clean Air Act requirement to protect public health with an adequate margin of safety.

We recommend setting the standard at 0.070 ppm. This level protects public health while increasing the opportunities for jurisdictions to succeed in attaining the standard within a reasonable timeframe. We encourage EPA to continue research into the health effects associated with setting the O₃ NAAQS at 0.060 ppm and to include this research in future NAAQS decision-making.

CAMPO supports the intent of a distinct secondary standard to protect public welfare. We advise EPA to take the full two-year period for the secondary standard's designation process. The proposal contains elements that need time for further development and



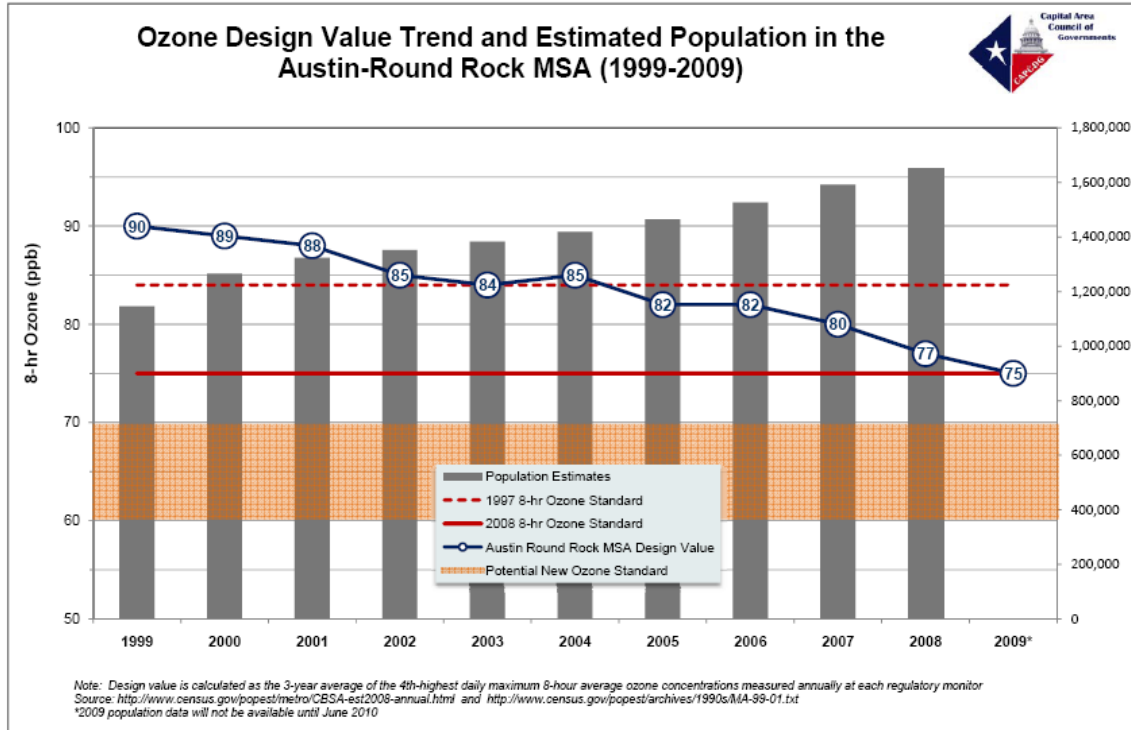
clarification. As the MPO, we are particularly concerned about how to demonstrate transportation conformity under the proposed secondary standard.

In addition, we ask EPA to consider Early Action Compacts as a tool for meeting the 2010 Ozone NAAQS. The Austin-Round Rock MSA has an exemplary record of developing and implementing successful voluntary emission reduction initiatives such as the Early Action Compact and Ozone Flex Programs. The MSA's 2009 ozone design value is 0.075 ppm and complies with the 2008 NAAQS. Voluntary programs have improved the MSA's design value even as its population has increased. These voluntary programs:

- Produce emissions reductions sooner than traditional nonattainment;
- Promote greater buy-in from elected officials and the public;
- Tailor an emissions reduction plan specific to local conditions; and
- Return the region to traditional nonattainment, without delay of timeline, if the voluntary efforts are not successful.

Emission reduction measures in the region's Early Action Compact and Ozone Flex Programs have included:

- Vehicle Inspection and Maintenance program;
- Locally enforced heavy-duty vehicle idling limits;
- Power plant and area source emission reductions; and
- Approximately 200 measures selected and implemented by local governments.



Voluntary local programs are most effective when supported by EPA and state initiatives to reduce Transported Anthropogenic Background (TAB) emissions. During high ozone episodes in the Austin – Round Rock MSA, TAB levels are often 0.065 – 0.075 ppm, counteracting local efforts to comply with a 0.060 – 0.070 ppm standard. State and federal policies must support local efforts to ensure timely attainment of a more stringent standard.