

**CAMPO***Capital Area Metropolitan Planning Organization***RECEIVED****AUG 29 2008****AIR QUALITY
DIVISION**

August 25, 2008

Texas Commission on Environmental Quality (TCEQ)
Buddy Garcia, Chairman
Larry R. Soward, Commissioner
Bryan W. Shaw, Ph.D., Commissioner
Post Office Box 13087, MC 100
Austin, Texas 78711-3087

Dear Chairman and Commissioners:

Thank you for the opportunity to comment on the state's boundary and designation recommendation in response to the U.S. Environmental Protection Agency's revised ozone standard. We look forward to working with TCEQ to help ensure clean air for all Texans.

On August 11, 2008, the Capital Area Metropolitan Planning Organization (CAMPO) Transportation Policy Board passed a resolution detailing CAMPO's comments. I have enclosed a copy.

I am always available to answer questions or to provide further information. Please do not hesitate to contact me at 512.974.6441 or by email at joe.cantalupo@campotexas.org.

Best regards,

Joseph Cantalupo, AICP
Executive Director
Capital Area Metropolitan Planning Organization

Cc: Margie McAllister



CAMPO *Capital Area Metropolitan Planning Organization*

RESOLUTION of the Capital Area Metropolitan Planning Organization Transportation Policy Board

WHEREAS, on March 12, 2008 the United States Environmental Protection Agency (EPA) lowered the 8-hour ozone standard to 0.075 ppm and the Austin area could be subject to a nonattainment designation under the revised standard; and

WHEREAS, the Governor, in consultation with the Texas Commission on Environmental Quality (TCEQ), recommends nonattainment boundaries for EPA's consideration; and

WHEREAS, TCEQ is taking comments on process and boundaries through September 5, 2008; and

WHEREAS, CAMPO works to improve regional air quality and to keep the region in attainment and CAMPO is responsible for transportation conformity determinations if the region becomes nonattainment and

WHEREAS, a transportation conformity lapse can result in delayed federal transportation funding; and

WHEREAS, it is in the best interest of CAMPO and of the region it serves to communicate comments to TCEQ;

NOW, THEREFORE, BE IT RESOLVED BY THE CAPITAL AREA METROPOLITAN PLANNING ORGANIZATION that:

TCEQ should fully support inclusion of a voluntary compliance component in EPA's designation process for the revised 8-hour ozone standard.

Central Texas is proud of its successful voluntary air quality improvement plans and is eager for the opportunity to address the revised ozone standard through a voluntary program. In cooperation with EPA and TCEQ, the region has developed and implemented:

- The 1-hour Ozone Flex Plan to maintain the 1-hour standard;
- The Early Action Compact (EAC) to address the 0.08 ppm 8-hour standard; and
- The 8-hour Ozone Flex Program, which is expected to take effect in September and support continued compliance with the 0.08 ppm 8-hour standard.

The region's emissions inventory composition and trends are well suited to an EAC-style approach to compliance with the 0.075 ppm 8-hour standard. Analysis suggests that the region's on-road mobile source emissions, a major factor in our ozone production profile, will decrease significantly by 2015 in response to federally mandated fuel and fleet measures. The rapid implementation schedule of a voluntary plan offers the possibility of remaining under the previous attainment standards while allowing time for these measures to take effect.

TCEQ should keep intact discrete, well-established air quality planning groups and processes when making boundary recommendations.

We believe that the Austin-Round Rock Metropolitan Statistical Area (MSA) would suffer if linked with San Antonio into an unwieldy combined planning district. Please note that:

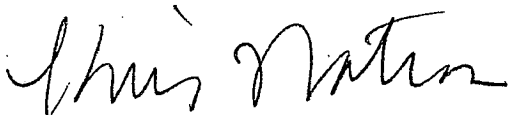
- Our MSA has an active, well-established air quality planning group that has enjoyed extraordinary success and should remain intact;
- A combined planning area would overly complicate transportation conformity issues by including multiple MPOs and TxDOT districts; and
- Analysis of commute, employment, and population data suggests that the two areas remain distinct.

TCEQ should assist, though implementation of robust regional strategies and improved alignment of attainment dates, in mitigating the effects of interstate and intrastate ozone transport.

Our MSA receives transported emissions from heavily polluted upwind areas, many of which are already in nonattainment. We will have to rely, in part, on regional strategies to insure our compliance with the 0.075 ppm standard.

The federal classification protocol for nonattainment areas allows heavily polluted areas more time to attain than those with lesser pollution problems. This puts Central Texas in the awkward position of trying to meet the revised standard well in advance of the attainment schedules of the upwind pollution sources. We suggest accelerated attainment deadlines for heavily polluted areas.

PASSED and APPROVED this day of August 11, 2008



Senator Kirk Watson
Chair, CAMPO Transportation Policy Board