Appendix C
Public Comments from Local Process

Dear CAAP,

I am disappointed to find in the MSA Clean Air Action Plan only three references to idling recommendations:

1.) Page 32. Reference to Two-Speed Idle test equipment.

2.) Page 33. Reference to Two-Speed Idle test equipment.

3.) Page 44. Reference to Idle Reduction Infrastructure.

No recommendation is included for area-wide, heavy vehicle idle restrictions. This is a serious oversight. Idling trucks and buses are a major contributor to Central Texas' deteriorating air quality.

Please add an anti-idling recommendation to the plan. See attached flyer.

Anti-idling is recognized worldwide as an important component of any clean air plan. Please see and view the following links:

U.S.

http://www.ccities.doe.gov/anti-idling.html - US - DOE
http://dep.state.ct.us/whatshap/press/2002/cr0115.htm - StateConnecticut http://dep.state.ct.us/air2/siprac/2002/anti.pdf - Connecticut School Transportation Association
http://www.seekinglight.net/dieanti1.htm - Massachusettes
http://www.fleetowner.com/ar/fleet_idle_not/index.htm - Cat Electronics, a business unit of Caterpillar
http://cleanair.fleetowner.com/ar/fleet_ultimax_llc_confidence/index.htm - US Trucking and diesel manufacturers
http://www.detourpublications.com/links.html - emissions-eco clearinghouse http://www.ectts.com/TRUCKGEN.html - You know your fuel bills are hurting your profits and you've been looking for the ultimate anti-idling device that's small & light enough to fit your truck
http://www.hhhydro.on.ca/smogresponseplan.htm -
http://www.idleaire.com/industry.html - Idling practice has a number of undesirable consequences:

- Wastes fuel
- Increases engine maintenance costs
- Causes medical problems
- Causes air pollution
- Creates noise in residential neighborhoods
- Creates poor resting environment for drivers

http://www.ipd.anl.gov/ttrdc/idling.html - Estimates by Argonne National Laboratory, the average long-haul truck idles away up to $1,790 in profits each year. Instead of letting their engines idle, operators of class 7 and 8

trucks should consider using separate devices for cab heating and cooling and engine-block warming.
http://www.safetruckers.com/page1.html
http://www.nypa.gov/ev/evsum.htm - NYC anti-idling
http://www.ctts.nrel.gov/heavy_vehicle/related.html - Heavy vehicle projects

conducted at NREL support the U.S. Department of Energy's Office of Energy Efficiency and Renewable Energy.
http://www.eren.doe.gov/ - US DOE
http://www.cleanaircommunities.org/press/080601-huntspoint.html - EPA Anti-Idling Press Release - Nation's First Advanced Electrification Project to Reduce Idling Truck Emissions
http://www.ccities.doe.gov/anti-idling.html US DOE - Anti-idling devices http://www.dieseldoc.net/idle_limiter.htm - Engine Idle Limiter
http://www.truckinverter.com/index.asp - Idling technology
http://www.epa.gov/ne/eco/diesel/ - At school bus depots, limit the idling time during early morning warm-up to what is recommended by the manufacturer

and/or permitted by state anti-idling laws (generally 3 to 5 minutes). In colder climates, block heaters, which plug into electrical outlets, can help

warm-up the engine to avoid starting difficulties and shorten warm-up time.
http://www.smud.org/evs/community.html - Sacramento Municipal Utility

Other countries:

http://www.cleannorth.org/article/376.html - Canada
http://oee.nrcan.gc.ca/idling/home.cfm - Canada
http://www.mmbc.jp/mmbc/Japan_Today/9906/990602hy1.html - Japan
http://www.ntt.co.jp/kankyo/e/2001report/2/254.html - Japan
http://www.city.mississauga.on.ca/idlefree/decal.htm - Canada
http://www.climatechangesolutions.com/english/municipal/tools/transport/idle
.htm
- Ontario, Canada
http://www.nrcan.gc.ca - Greater Sudbury, Canada
http://www.airquality.hamilton.on.ca/projects/signs2.html
http://www.newswire.ca/releases/April2002/15/c4238.html - Mississauga, Natural Resources Canada - School Buses
http://www.cityparent.com/cityparent/archive/20020617/74318.html - Mississauga, Natural Resources Canada - School Buses
http://www.imperialoil.ca/news/news_releases/mn_news_020819.html - Imperial Oil Co. of Canada http://www.cppi.ca/2002/AntiIdling02EN.pdf - Canadian Petro Products Institute and Govt. of Canada
http://www.whatsupchuck.on.ca/chuck/volume4/issue3/editor.htm - Anti-idling farce?
http://buzz.ca/ - anti-idling humor
http://www.nwtclimatechangecentre.ca/programs.htm - Canada/Northwest
http://www.allanrock.com/news/020814_idling.html - Canada Govt.
http://www.nb.lung.ca/schools/3000e/ehi_pvi_e.htm - Canada Healthy Schools http://www.flightforlifeonline.com/ - Canada - Schools
http://www.greeninggovernment.gc.ca/fleet/fleet.htm - Canada Govt. Fleet http://www.flstransport.com/News.htm - Ontario Trucking Assc.
http://www.taiga.net/nce/yc4/initiatives/closer.html#cts_idling - Yukon Anti-Idling Campaign http://www.carleton.ca/jmc/cnews/01022002/n1.shtml - In Ottawa, it's against

the law to idle your car for more than five minutes, but the federal energy regulator says anything more than 30 seconds is too much.

Thank you.

Michael G. Albrecht
2809 De Soto Circle
Austin, TX. 78733
512-475-2277 (wk)
512-263-7875 (hm)

Get fast, reliable access with MSN 9 Dial-up. Click here for Special Offer!
http://click.atdmt.com/AVE/go/onm00200361ave/direct/01/

Incoming mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.644 / Virus Database: 412 - Release Date: 3/26/2004

-----Original Message-----
From: Kevin Tuerff [mailto:ktuerff@austin.rr.com]
Sent: Monday, August 25, 2003 8:58 PM
To: altenhoff.caf@capco.state.tx.us
Subject: EAC support

I'm writing to express my support for the Early Action Compact and the proposed list of pollution control strategies being considered.

Based on my experience in Houston and D/FW, I especially support early adoption of vehicle emissions testing, cleaner fuels and restrictions on commercial and government lawn equipment on high ozone days. Let's not waste time debating technologies for I&M. The TCEQ/DPS program is now working well. Let's latch on to it and immediately start removing dirty vehicles for repair.

Some items on the list will certainly create debate. One item that never did work in Houston was the Trip Reduction program (TR1). Better incentives are needed for employers. Or the minimum number of employees should be increased to 200+ so to not affect small businesses.

For reduced workforce (TR4), I'm assuming government employees referenced would be telecommuting, and not just getting an extra day off? It today's age, these agencies could already be doing this for many of their employees.
Other suggestion would be for all state employees to stagger their work starting time on ozone action day. It's been shown that by stretching out the morning rush hour, we might avoid heavy concentrations of pollutants that begin to bake.

Don't forget about public education to implement these voluntary and mandatory programs! Also your web site is really hard to navigate for the average education level.
Good luck.

Sincerely,

Kevin Tuerff
5724 Hero Dr.
Austin, TX 78735

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February 9, 2004

Ms. Cathy Stevens
CAMPO
PO Box 1088
Austin, Texas 78767

Ms. Deanna Altenhoff
Clean Air Force
2512 S. IH-35, #200
Austin, Texas 78704

Re: Comments on Early Action Compact Measures

Dear Ms. Stevens and Ms. Altenhoff:

Please consider these comments on the proposed Early Action Compact. The MoPac Boulevard Alliance (MBA) has previously submitted comments, which we continue to urge officials to consider. We assume that you will forward this letter to the members of the compact and are sending you this letter vial e-mail and hard copy to facilitate forwarding the comments.

At the outset, we would like to compliment the Texas Clean Air Force and all the local governmental entities that participated in the development of the compact. In contrast to other compacts in this state, the Central Texas Early Action Compact promises concrete programs and makes specific commitments for emission reductions. We are pleased that the region recognizes the importance of a partnership with the Texas Commission on Environmental Quality (TCEQ) to achieve these specific goals.

However, as the region works to reduce air pollution emissions, we believe there remain some serious deficiencies in the compact. Those deficiencies follow.

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1. No attempts to change trend of increased vehicle miles traveled.

Our most specific concern is that the compact does nothing to change this region's support for a vehicle dependent society where average daily miles has a trend of increasing. In other words, not only do we have more cars because of increased population, we also have more cars per household – and those persons are driving more miles each day over time. The signatories to this compact have the ability to plan transportation systems that will either reduce or at least won't contribute to the increased VMD (vehicle miles per day) trend. Instead, the region continues to support roads farther and farther from employment centers – SH 130, e.g., -- and has no concrete plans for other modes of transportation. Further, when the region has opportunities to support different modes of transportation, such as building bicycle lanes in newly proposed highways or encouraging bus commuting by HOV lanes, such as on SH 45 SE, no efforts are made to facilitate forms of commuting that reduce emissions.

Instead, the region relies primarily on federal regulations to clean up fuels and reduce emissions from light trucks. And the region will subject vehicles to an inspection and maintenance program to catch the small percentage of non-complying vehicles.

Our burgeoning transportation system, which simply allows more vehicle miles traveled over time, will limit the ability of companies to expand or move into this region. As you know, emission reductions come either from vehicles or point sources. It the VMT trend is not decreased, the slack will have to be taken up by industry in the long run.

Additionally, the region is sending mixed messages by asking major employers to find ways to decrease commuting of its employees while our MPO continues to expand the ability of citizens in the region to live farther from workplaces and commute longer distances. It is like offering a pile of candy to an overweight crowd and asking them to go on a diet. Why offer the candy?

The specific recommendations below would reduce emissions from the transportation system.

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The Capitol Area Metropolitan Planning Organization (CAMPO) and the Central Texas Regional Mobility Authority (CTRMA) should commit to a multi-modal transportation system that is coordinated with land use planning, which will reduce the trend of driving farther distances. CAMPO should make a commitment to work with Envision Central Texas experts and to hire them as consultants to assist in the regional vision of growth. A specific commitment should be made in the compact toward reducing the trend of increased vehicle miles traveled by working to develop transportation systems and land use plans that decrease the need to drive long distances. CAMPO and the CTRMA can review such multi-modal systems in its 20 year planning and whenever it considers a new roadway.

Additionally, the road builders in the region can commit to consider the impacts on air pollution of new roads by modeling different alternatives in a transportation model. In the new roadway environmental impact statement process, the road builders for the region, the Texas Department of Transportation and CTRMA can propose a wide array of alternatives, not simply different roads in different locations: e.g., HOV lanes, bicycle lanes, high speed bus, and different transit options. The regional travel model can be run (a region-specific one as mentioned below) with different inputs – e.g., HOV, bicycle, etc. – to determine how different alternatives affect VMT and speeds for vehicles (both of which affect air pollution) and to inform officials who are choosing among alternatives. This is not a request for regional air dispersion modeling, instead a request that transportation models be run to determine the effect of different alternatives. Currently, the alternatives presented and the information given to those officials doesn't allow them to consider the effects of individual roadways on air pollution in this region.

Measurable commitments should be made for Smart Growth, not just in Austin, but also in outlying areas. This region has made tremendous steps in trying to envision a future that allows growth in a way that continues the high quality of life Central Texans expect. But if specific commitments are not made to facilitate those policies, the effort will be thwarted. County governments should work with state legislators to request specific authority to help manage growth. While many may think this is politically infeasible, it is the only way control rampant sprawl outside the city limits of many cities. And state legislators for the Central Texas region understand the complex problems that unmanaged

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growth will bring to this region. Cities within the region should commit to work on their own Smart Growth plans, i.e., plans that facilitate transit-oriented development, to preserve their unique individual character.

As we said in previous comments, local governments should make specific financial commitments to an integrated bicycle pathway and bicycle facilities in workplaces. Specifically, local governments, the CTRMA and CAMPO should commit to spend 15% of all new transportation dollars, including bonds for transportation, on bicycle lanes that are integrated into a system as well as bike racks and showers. This effort should be coordinated with major employers to determine the geographic location of most of their employees and plan bike lanes to accommodate bicycle commuting.

Further, we are continuously distressed to hear local officials tout the value of adding new highways as a mechanism to decrease air pollution. While decreasing congestion may have a short term benefit for emissions (reducing those idling vehicles), adding more highways will, in the long term, simply induce more travel. The compact process, at a minimum, should have provided the opportunity for local officials to understand that, in the long run, simply adding highways to this region will not solve our transportation problems or our air pollution problems.

2. Reducing emissions from existing transportation system.

The compact takes the traditional method to reduce air emissions: an inspection and maintenance program. It is MBA's understanding that an I&M program will reduce emissions from a small percentage of vehicles. MBA has asked CTEAC for the basis for figures used in the compact but not received those, so it is difficult to make a comparison, but it seems that elected officials would want to be able to compare the effect of reducing speeds, or the effect in a change of mix of light trucks in our vehicle mix in comparison to an I&M program.

For instance, there is no mention in the report of the air benefits of reducing speed limits. As explained by the Texas Transportation Institute

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(TTI), higher speeds produce greater emissions.[1] We note that the City of Dallas successfully reduced speed limits by 5 miles per hour. Not only would lowering speed limits reduce air pollution, but it would save fuel, increase safety and reduce noise. MBA recommends that speed limits be lowered to 55 within the City of Austin.

There is no attempt in the compact to curtail high use of light trucks in region. While new light trucks should have lower emissions in the future, that may not be soon enough to avoid nonattainment. MBA recommends that the region charge an air quality surcharge for trucks and SUVs and other passenger vehicles not meeting stringent emission requirements. The central Texas region has a high percentage of SUVs and trucks that do not meet stringent emissions standards. These vehicles disproportionately pollute our air. Those vehicles that do not meet the stringent emissions standards should be charged an additional registration fee of $20.00 to go into an air quality fund. This is only fair as these vehicles contribute significantly to air quality problems. While there may be concerns that legislative authority is lacking for such a proposal, a commitment to go to the legislature should be made by this region.

Also, the region could undertake a public campaign to inform the public about emission rates from trucks and SUVs and encourage the purchase of lower emitting vehicles. The public may be aware of the high fuel consumption but not the high emission rates. Vehicle dealers should be required to disclose the emission rates of SUVs and trucks compared with regulated vehicles as part of any sale.

As explained above, MBA has concerns about the employer commuter program. The CTEAC requires businesses with more than 100 employees to reduce emissions by 10% by establishing commuter programs. The Austin Chamber of Commerce has asked that this measure be modified to include only those businesses with more than 200 persons and has also added a “best efforts” phrase. MBA has previously commented that if employers are only required to make best efforts, then those specific emission reductions should not be included in

[1] Presentation of J. Zietsman, Ph.D., P.E., TTI, “The Relationship Between Roads and Air Quality.”

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the model. MBA has also asked which employers meet the 200 employee requirement and not seen an answer.

We agree that employers should play a role in emission reductions, but if the region's MPO continues to encourage sprawl through its transportation decisions – by building roads allowing people to live father and farther from places of employment, and by not committing to policies that lead to more compact cities, it seems unfair to ask businesses to reduce commuting distances while our government officials make decisions making long distance commuting easier. The government can undertake policy decisions to assist with private commuter programs.

We assume that the employer commuter program applies to governmental entities as well as private employers. This is not clear in the document. Since the top ten employers in Austin include the University of Texas, the City of Austin, the Austin Independent School District and the County, this fact is significant.

Further, to facilitate reduction in commuting, efforts should be made for commercial buildings to accommodate bicycle commuting. New commercial buildings with a certain square footage should build showers and bicycle facilities. All new commercial facilities should be built to accommodate bicycle commuters. This means new buildings meeting a certain square footage (that which would correspond with 50 employees) should have showers and bicycle racks.

Existing employers should be encouraged to retrofit buildings for showers for workers who commute. Money generated from high emitting vehicles into the clean air fund could be used for grants and loans.

3. Concerns about accuracy of travel model.

We are concerned that the travel demand modeling used as a basis for this compact is not the best available science. What this means is that the travel demand modeling is not the most accurate mechanism to determine vehicle miles traveled and speeds to be used in air quality modeling or to pinpoint the location of those vehicles. The Central Texas region has a remarkable opportunity to use a transportation model designed by nationally known experts. This model has been designed by Smart Mobility, Inc., specifically to reflect the effect of new roads on

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traffic patterns in this region. The model was recently used for the Envision Central Texas (ECT) regional planning.

The MoPac Boulevard Alliance (MBA) has previously urged CAMPO to use this region sensitive Smart Mobility travel model. We believe that elected officials should use the best available and most scientifically accurate information in order to make commitments about the future air quality of this region (mistakes could lead to nonattainment). The region has not yet used the best travel model.

The proposed compact suggests that "induced demand created by new roads" is taken into account by "the spatial allocation of the population and employment estimates." (Compact, p. 10.) This is not sufficient to accurately predict the effect of new roads on vehicle miles traveled and speed.

We are also concerned about the accuracy of the travel model's determination of the mix of light trucks in the Central Texas region. This is a significant number since light trucks, including SUVs, have higher emission rates. And while it is true that there will be new truck emission standards in 2007, those new trucks will not make up a significant percentage of the light trucks immediately. In fact, recent vehicle statistics show that Americans are keeping their vehicles for longer periods of time.

Finally, we are concerned that that transportation model may not show that those with light trucks tend to have longer commutes. MBA questions the accuracy of the mix of light trucks in the CAMPO transportation model; the location of those light trucks geographically (i.e., the VMT for those trucks); and the assumptions made about the length of time for those vehicles to be replaced.

4. Concerns about assumptions in air quality model.

From reviewing the compact, it is difficult to understand the assumptions and specific figures used in the modeling. We have asked to see these assumptions but not gotten a response.

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We have particular concerns about decreased emissions assumed resulting from the I&M program, the commuter program, and attainment in Texas cities.

As for the I&M program, we have not been able to review the basis for the reductions predicted, therefore, we cannot comment on the validity of those numbers. We hope those numbers would be made available for the public to review as this promises to be a controversial effort. Understanding the basis for thee numbers – e.g., are we using the efficiency of an I&M program based on successes in other cities – would be helpful. Now that the City of San Marcos has refused to require inspection and maintenance in that city, any reductions assumed for vehicle emission reductions from that city must be removed from the compact and the model.

As for the commuter program, as we have stated in an e-mail to the Clean Air Force, any presumptions about reductions from such a program must be taken out of a model if recommendations by the Chamber of Commerce are accepted. The Chamber proposes that businesses make their "best efforts" to reduce commuting. A commitment to use "best efforts" is not a commitment to succeed and is not sufficient on which to base modeling reductions.

Finally, we are concerned that the attainment of this region relies on the success of other regions in the state in cleaning up their air. We suggest that the air quality model should be run assuming the regions do not reach attainment to determine how sensitive our region is to relying on other regions' actions. To make informed decisions, we must understand the impacts of other regions on our air quality.

5. Focus on green space.

MBA previously emphasized the opportunity the region has to integrate its land use planning with transportation and air pollution issues. Commitments for green space should be made in the compact. The compact makes a commitment for planting trees, but ignores the rapid pace at which open green space is being lost. This open green space is not only important to the quality of life that Central Texans treasure. It also helps preserve air quality. Local governments should commit to

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require a purchase of green space for each new development – or the creation of a fund to purchase green space.

Again, we are pleased that the region has worked cooperatively on emission reduction strategies. Important steps have been made, and it appears that regional alliances have been formed. But without a system that works regionally to plan transportation and land use, the region will continue to sprawl, and attempts to clean up the air will – in the long run, if not the short run – be frustrated.

Thank you.

Yours truly,

Amy Johnson

> From: Terri Buchanan[SMTP:ACG@AUSTIN.RR.COM]
> Sent: Saturday, September 06, 2003 1:43:34 PM
> To: The CLEAN AIR FORCE of Central Texas
> Subject: AAS advertisement
> Auto forwarded by a Rule
>

I wanted to take a moment to comment on the current ads your agency is sponsoring for the Clean Air Force on the Early Action Compact. While the ads are graphically pleasing, the basic purpose is not being achieved because they are illegible. The font is so small, NO ONE, young or old can actually read them without great concentration.

It seems as if that should have been a consideration before approving the advertising campaign. It also seems that you may be wasting money by continuing to run the ads.

Thank you for your attention.

Terri Buchanan, MPH | AUSTIN TEXAS

512.371.7659

-----Original Message-----
From: scott johnson [mailto:scottaj1@juno.com]
Sent: Wednesday, February 18, 2004 3:52 PM
To: Cathy.Stephens@ci.austin.tx.us
Subject: Additional CAAP Strategy

11) Industrial-size charbroilers and barbeque pits

According to a Rice University study, organic particles from meat smoke that occur when fatty acids drip onto hot coals are released into the air in steady concentrations throughout the year. This particulate matter (PM 2.5) is traced using unique molecular fingerprints to differentiate them from other particles. PM 2.5 is a serious health issue that has been linked to increased mortality and may play a role in ozone formation. The State of Maryland requires permits for charbroilers and barbeque pits even though enforcement only comes via nuisance complaints.

The South Coast Air Quality Management District (SCAQMD) regulates fast-food restaurants that use chain-driven charbroilers by requiring the installation of ceramic filters. To meet ozone and PM 2.5 standards by 2010, SCAQMD is considering more rigorous rules for restaurants. California's PM 10 and PM 2.5 standards are lower (more protective of public health) than the respective national standards.

No VOC or PM emission figures are available for restaurants for Central Texas. Some of the VOC's emitted by restaurants may not be well documented. For comparison purposes, no emission figures are available for the Houston or the State of Maryland either.

Implementation option: Study the SCAQMD rule and consider implementing it for the 3-county region.

-----Original Message-----
From: Mike Albrecht [mailto:mgasgw@hotmail.com]
Sent: Tuesday, February 17, 2004 5:25 PM
To: caapcomments@capco.state.tx.us
Cc: stacy.neef@ci.austin.tx.us
Subject: Austin/Round Rock MSA Clean Air Action Plan comment

Dear CAAP,

I am disappointed to find in the MSA Clean Air Action Plan only three references to idling recommendations:

1.) Page 32. Reference to Two-Speed Idle test equipment.

2.) Page 33. Reference to Two-Speed Idle test equipment.

3.) Page 44. Reference to Idle Reduction Infrastructure.

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Please add an anti-idling recommendation to the plan. See attached flyer.

Anti-idling is recognized worldwide as an important component of any clean air plan. Please see and view the following links:

U.S.

http://www.ccities.doe.gov/anti-idling.html - US - DOE
http://dep.state.ct.us/whatshap/press/2002/cr0115.htm - StateConnecticut
http://dep.state.ct.us/air2/siprac/2002/anti.pdf - Connecticut School Transportation Association
http://www.seekinglight.net/dieanti1.htm - Massachusettes
http://www.fleetowner.com/ar/fleet_idle_not/index.htm - Cat Electronics, a business unit of Caterpillar
http://cleanair.fleetowner.com/ar/fleet_ultimax_llc_confidence/index.htm -
US Trucking and diesel manufacturers
http://www.detourpublications.com/links.html - emissions-eco clearinghouse
http://www.ectts.com/TRUCKGEN.html - You know your fuel bills are hurting your profits and you've been looking for the ultimate anti-idling device that's small & light enough to fit your truck
http://www.hhhydro.on.ca/smogresponseplan.htm -
http://www.idleaire.com/industry.html - Idling practice has a number of undesirable consequences:

- Wastes fuel
- Increases engine maintenance costs
- Causes medical problems
- Causes air pollution
- Creates noise in residential neighborhoods

· Creates poor resting environment for drivers
http://www.ipd.anl.gov/ttrdc/idling.html - Estimates by Argonne National
Laboratory, the average long-haul truck idles away up to $1,790 in profits each year. Instead of letting their engines idle, operators of class 7 and 8 trucks should consider using separate devices for cab heating and cooling and engine-block warming.
http://www.safetruckers.com/page1.html
http://www.nypa.gov/ev/evsum.htm - NYC anti-idling
http://www.ctts.nrel.gov/heavy_vehicle/related.html - Heavy vehicle projects conducted at NREL support the U.S. Department of Energy's Office of Energy Efficiency and Renewable Energy.
http://www.eren.doe.gov - US DOE
http://www.cleanaircommunities.org/press/080601-huntspoint.html - EPA Anti-Idling Press Release - Nation's First Advanced Electrification Project to Reduce Idling Truck Emissions
http://www.ccities.doe.gov/anti-idling.html - US DOE - Anti-idling devices
http://www.dieseldoc.net/idle_limiter.htm - Engine Idle Limiter
http://www.truckinverter.com/index.asp - Idling technology
http://www.epa.gov/ne/eco/diesel/ - At school bus depots, limit the idling time during early morning warm-up to what is recommended by the manufacturer and/or permitted by state anti-idling laws (generally 3 to 5 minutes). In colder climates, block heaters, which plug into electrical outlets, can help warm-up the engine to avoid starting difficulties and shorten warm-up time.
http://www.smud.org/evs/community.html - Sacramento Municipal Utility

Other countries:

http://www.cleannorth.org/article/376.html - Canada
http://oee.nrcan.gc.ca/idling/home.cfm - Canada
http://www.mmbc.jp/mmbc/Japan_Today/9906/990602hy1.html - Japan
http://www.ntt.co.jp/kankyo/e/2001report/2/254.html - Japan
http://www.city.mississauga.on.ca/idlefree/decal.htm - Canada
http://www.climatechangesolutions.com/english/municipal/tools/transport/idle.htm - Ontario, Canada
http://www.nrcan.gc.ca - Greater Sudbury, Canada
http://www.airquality.hamilton.on.ca/projects/signs2.html
http://www.newswire.ca/releases/April2002/15/c4238.html - Mississauga, Natural Resources Canada - School Buses
http://www.cityparent.com/cityparent/archive/20020617/74318.html - Mississauga, Natural Resources Canada - School Buses
http://www.imperialoil.ca/news/news_releases/mn_news_020819.html - Imperial
Oil Co. of Canada
http://www.cppi.ca/2002/AntiIdling02EN.pdf - Canadian Petro Products Institute and Govt. of Canada
http://www.whatsupchuck.on.ca/chuck/volume4/issue3/editor.htm - Anti-idling farce?
http://buzz.ca/ - anti-idling humor
http://www.nwtclimatechangecentre.ca/programs.htm - Canada/Northwest
http://www.allanrock.com/news/020814_idling.html - Canada Govt.
http://www.nb.lung.ca/schools/3000e/ehi_pvi_e.htm - Canada Healthy Schools
http://www.flightforlifeonline.com/ - Canada - Schools

http://www.greeninggovernment.gc.ca/fleet/fleet.htm - Canada Govt. Fleet
http://www.flstransport.com/News.htm - Ontario Trucking Assc.
http://www.taiga.net/nce/yc4/initiatives/closer.html#cts_idling - Yukon Anti-Idling Campaign
http://www.carleton.ca/jmc/cnews/01022002/n1.shtml - In Ottawa, it's against the law to idle your car for more than five minutes, but the federal energy regulator says anything more than 30 seconds is too much.

Thank you.

Michael G. Albrecht
2809 De Soto Circle
Austin, TX. 78733
512-475-2277 (wk)
512-263-7875 (hm)

> From: Robert Whittaker[SMTP:DEPUTYDOG60@MSN.COM]
> Sent: Saturday, September 06, 2003 10:02:13 AM
> To: The CLEAN AIR FORCE of Central Texas
> Subject: Fw: Clean air Act, and EAC for Central Texas.
> Auto forwarded by a Rule
>

Thank you for the opportunity to speak my mind on the subject of EPA standards for clean air and your proposed solutions. I have read the proposals listed in your Web page. All very good suggestions.
My opinions are based on the assumption that State and local legislation will be enacted to help curtail the sources of the identified air pollution:

1. Motor vehicles come from all over the state and from out of state into Central Texas. Each of them contributes to the states air quality problems. Therefore common sense dictates that all gasoline sold in Texas should be "Reformulated Gas" that is oxygenated to the extent that it reduces Nox, and Vox to meet EPA standards.

2. All gasoline sold in Texas should also be required to contain fuel cleaners that help keep the motor vehicles fuel injectors, carburetors, and spark plugs clean.

3. Mandating vehicle inspections to assure compliance with emission levels is prudent, "BUT SINCE I DIDN'T MAKE MY CAR WHY SHOULD I BE REQUIRED TO ASSURE THAT IT MEETS THE STATES EMISSION STANDARDS ?" Since it is the
States responsibility to provide protection for its citizens then the State should mandate that all motor vehicle manufacturers should be required to certify that their vehicles comply with the State and Federal EPA emission standards. Moreover, the State should mandate that the manufacturers and their dealers should be required to test all their vehicles sold in Texas Free of charge at intervals required by the State to assure that the vehicles are in compliance with emission standards. THE COST OF PROVIDING THAT SERVICE CAN BE INCORPORATED INTO THE INITIAL COST OF THE VEHICLE BASED ON THE PROJECTED SERVICE LIFE OF THE VEHICLE. If the service life of a vehicle is projected to be 100,000 miles then using the insurance industry estimated annual driving distance of 12,000 miles per year the vehicle should only have to be tested for roughly nine (9) years. Using the estimated cost of $25.00 per inspection per year that total comes to $225.00 for the service life of the vehicle. Not much of an expense if incorporated into the life of the vehicle at purchase time, BUT IT CAN BE A PAIN TO THE TAXPAYERS WHEN THAT ITEM IS ADDED TO THEIR LIST OF THINGS THEY HAVE TO DO WITH THEIR CAR EVERY YEAR.

4. The State of Iowa uses "REFORMULATED GAS" and they don't appear to have any problems with air quality as the gas is sold all over the state, not just in one region.

Thank you for reading my opinions.

Robert J. Whittaker, Jr
125 Belfalls Dr.
Georgetown, Texas 78628-4940

-----Original Message-----
From: Pat Fogarty [mailto:WF10@txstate.edu]
Sent: Tuesday, January 27, 2004 8:29 AM
To: 'CAAPcomments@capco.state.us'
Cc: Pat Fogarty; Allen Goldapp
Subject: CLEAN AIR ACTION PLAN

Your letter of December 30, 2003 requested comments regarding the feasibility of implementing measures proposed by the Draft Clean Air Action Plan of December 11, 2003.

Many of the proposed actions do not pertain to the university and others have little impact. I will comment only about those that have significant impact.

A1. Inspection and Maintenance - Testing of the university's vehicles is certainly doable but costly. Requiring students to prove their vehicle meet emissions at the time they register for parking permits would be a large administrative burden.

B5. Alternative Commute Infrastructure Requirements - We may already meet this requirement as we do have showers, bike racks and preferential carpool parking places. However, the showers are in gymnasiums and not in the academic or administrative buildings. If you required showers in every building then I would say that would be very costly.

B18. Shift the electric load profile - We have studied thermal storage as an option but it is not cost effective for our university. We also don't have a good place to put a storage tank.

B36. Contract provisions addressing construction related emissions on high ozone days - I agree that this is controversial. This will be a very costly program to implement. Such a program would result in numerous construction delays and claims. Simply putting in the number of ozone delays in the contract doesn't solve the problem. Telling a contractor to stop a particular activity on short notice would have a big impact on the entire project.

Pat Fogarty

Associate Vice President for Facilities

Texas State University-San Marcos

(512) 245-2820

wf10@txstate.edu

> From: Artie Berne[SMTP:ABERNE@AUSTIN.RR.COM]
> Sent: Tuesday, September 09, 2003 2:50:36 PM
> To: The CLEAN AIR FORCE of Central Texas
> Subject: Clean Air
> Auto forwarded by a Rule
>

How is the development of hydrogen cars coming along.

We need to get the Big Oil Chronies out of office and push alternative fuel cars. That is the only way were going to fix our air. We are to fixated on oil driven cars. We also need to push Solar Energy.

Artie Berne
512-261-0024
cell: 512-750-5768
email: aberne@austin.rr.com

> From: johnny v wolf[SMTP:J-LOBO@TEXAS.NET]
> Sent: Tuesday, September 09, 2003 5:08:47 PM
> To: The CLEAN AIR FORCE of Central Texas
> Subject: Pollution reduction
> Auto forwarded by a Rule
>

September 9. 2003

CLEAN AIR FORCE

CAAPcomments@capco.state.tx.us

Copies: Governor Rick Perry, Lt. Governor David Dewhurst, Senator Jeff Wentworth, Representative Patrick Rose

This is my suggestion for reducing the level of ozone pollution and one that would accomplish it with several other benefits of importance not only to the counties of Central Texas, but to all of Texas and the United States as well.

1. It will lower the level of ozone pollution for all years to come at the expense of those that are causing the most pollution.
2. Those who are causing the least amount of pollution will benefit for their actions.
3. It will help reduce the United States dependence for foreign oil.
4. It will force the auto makers to manufacture more vehicles with either increased efficiency or smaller engines for higher gas mileage and therefore reduce pollution of our atmosphere. Without laws of which I am proposing, the auto makers will continue to manufacture larger vehicles with bigger and more "gas guzzling" engines as there is more profit made from this type vehicle.
5. It would bring in much needed money to the counties and/or State of Texas.
6. It would eliminate costly auto pollution inspections.

My suggestion might be "hard to stomach" for most vehicle owners as the majority has an "ego complex" about larger vehicles with bigger engines.
BUT, for God's sake, CLEAN air is far more important than their "ego"!

My suggestion would entail getting the Texas legislature to pass laws putting it into effect. These laws could be only for the counties affected by the EPA but would best serve everyone by applying it statewide. This is not as impracticable as it might seem as California has passed many laws to control pollution which apply only to California.

My suggestion is as follows and would apply to all cars and trucks, gasoline or diesel, which are 10 years old or less:

Vehicles with an EPA combined city/highway gas/diesel mileage rating of 0-10 MPG would pay a surcharge of $1000.00/year.

Vehicles with an EPA average of 10.01-20 MPG would pay a surcharge of $500.00/year.

Those with an EPA average of 20.01-30 MPG would benefit by not having to pay any surcharge.

And to reward those owning or purchasing a vehicle with an EPA average of 30.01 MPG or higher, a refund of $250.00/year.

This might seem like a "draconian" method and will be fought by most SUV and pickup "ego maniacs" (those that own vehicles with high MPG), but is a simple and effective method to reduce our pollution at the expense of those causing the problem while rewarding those that do not!

The rest of the world drives high MPG vehicles, Texas and the USA should too! My suggestion would accomplish this.

Thank you!

Johnny V. Wolf
171 Wolf Creek Pass
Wimberley, TX 78676
512-847-2916
J-lobo@texas.net

CAAP Comments

Other than power plant emission reductions, Central Texas has not yet done enough to reverse the growth in air emissions. Too much discussion is based around Central Texas getting credit for existing control measures.

An implementation plan is needed for many of the proposed reduction measures to reach their full potential. Local governmental entities should not try to dominate the decision making process of which measures get chosen but should play an active role in enforcing the new regulations. In addition, they should seek community partners (advocacy groups, citizens, etc.) to help implement the measures that will require oversight. This oversight will complement the environmental agencies own oversight and help increase the effectiveness of the new rules.

A declaration from businesses, business associations and governmental leaders that regardless of any delay opportunity afforded by the federal government in complying with the 8-hour ozone standard they will continue to commit to the 2007 compliance deadline would make for a more predictable and effective EAC implementation.

Strategies/ideas:

1) Require TxLED for the Fayette Power Plant and other plants that burn diesel fuel to start their turbines (LCRA staff estimated a 16 ton per year reduction in SO2 from FPP by switching to TxLED). By state rule.
2) Ban the use of gas/diesel powered signboards. This strategy would have a quantifiable NOx reduction. By city rule in Central Texas or state rule in the 95 county East Texas area.
3) Require minimum Green Building standards for all new residential/commercial buildings and remodeling starts. The current Austin Energy program is voluntary and recognition based. By city ordinance to the energy code.
4) Develop a fee for the purchase of new gas-powered lawnmowers in 95-East Tx. Counties. Gas-powered lawnmowers are a major source of VOC and CO emissions. The proposed fee would be utilized to fund electric lawnmower exchange programs throughout the region. By State rule.
5) Electric lawnmower exchange program (residential). This program was conducted in 1997, 2002 and 2003 and quantifiably reduced VOC emissions. Voluntary, grant-funded program.
6) Match City of Austin alternative transportation goals with appropriate funding.

The City's Transportation Dept. has set goals for bicycle and pedestrian infrastructure as encouraged or directed by the City Council. For example, Program 100% of bicycle, pedestrian, and road projects…." However, only 20% of analyzed adopted bicycle plan route miles were implemented and only 5% of locally funded projects were implemented. Also, "Increase accessibility and connectivity of existing sidewalk infrastructure by adding 60,000 linear feet and 100 curb ramps annually." The budgeted amount is only14,000 linear feet (77% below plan) and 75 curb ramps (25%
below plan. Vehicular mobility appears to be the city's focus. If so, this is detrimental to improving the modal split to increase commute trips by alternative transportation and thereby reduce vehicular emissions.

7) Require roadway projects to accurately model for induced VMT emissions and emissions generated from the road construction project on a per mile basis. New roadway projects coming online have the potential of increasing VMT, making it more difficult to attain the 8-hour ozone standard. Transportation offsets should be developed.

8) Prohibit the use of "power backs" at ABIA. "Power backs" occur when the pilot uses the aircraft engine to back up and not a push back to do so. Hopefully this procedure is not done anymore.
9) Encourage airlines to accelerate the retirement of older, more polluting aircraft used at ABIA. Boeing 737 and other similar vintage aircraft are large sources of NOx and VOC emissions. Voluntary measure.
10) Requiring an early usage (2005) of TxLED for all non-road vehicles & equipment.
11) Require an emission reduction plan for each road project.
12) Develop a refrigerator upgrade program where the purchaser gets a financial incentive to scrap their used refrigerator. Some vendors offer a turnkey service to handle the scrapped units. Include in Austin Energy's demand side management program as a voluntary measure.
13) Have the LCRA develop a Smoking Marine Engine Program with appropriate fines and enforcement resources. Personal watercraft would have to be included as well.
14) Phase out the use of gas-powered golf carts at city and private golf courses by 2007
15) Develop a sustainable purchasing protocol and life cycle assessment for all governmental entities in Central Texas. For example, this would include the use of all low-VOC products and the prohibition of buying cement from sources that burn hazardous waste and/or chipped tires as fuel.
16) Use remote sensing to screen for gross polluters along the Bastrop/Travis, Caldwell/Travis County lines and send letters requesting a vehicle inspection.
17) Have the CAF or EACTF write a white paper that states that reducing traffic congestion does not always reduce ozone levels and present it to city/county/state elected officials in Central Texas.
18) Set targets to reduce gasoline and diesel fuel consumption by governmental entities regionwide. Austin already has a 5% reduction target by 2005.
19) Require CAMPO and other planning entities to develop a land use plan that discourages extending infrastructure into previously unserved areas. Also, have their population forecasts match realistic trends to limit overextending infrastructure.
20) Develop a plan to help make downtown Austin a low emission zone.
21) Develop a plan to reduce emissions from restaurants.
22) Reduce parking requirements for commercial structures and match it up with an aggressive parking cash out program.
23) Reduce lane width requirements on new frontage roads and arterials to discourage speeding.
24) Require the sale of low-VOC paint regionwide.
25) Evaluate the setting of limits for nitrogen content in chemical fertilizers and VOC content in pesticides, insecticides and herbicides to reduce air emissions.
26) Require the use of synthetic oil by governmental entities and promote to benefits to businesses. Synthetic oil can have lower emissions.
27) Require low NOx water heaters regionwide.
28) Prohibit the sale of coal tar sealants for parking lots and tar-based sealants for roofs and find alternatives.
29) Speciate and inventory highly reactive VOC's sources in Central Texas.

30) Improve the oversight for the existing vehicle safety inspections that visually check for the presence of a catalytic converter, PCV valve, gas cap, etc.
31) Develop a fee for drought intolerant grasses.
32) Restrict the sale of lighter fluid or only permit brands that meet CARB regulations.
33) Encourage an aggressive preventative maintenance program for diesel generators.
34) Share existing alternative fuel sites with card access for utilization by fleet vehicles.
35) Pony packs to run the A/C, fans for select CMTA buses.
36) Require an air quality permit for appropriate outdoor events and base fee on sliding scale based on estimated attendance.
37) Market TERP to co.'s that overhaul engines.
38) Encourage governmental entities to purchase an emission-testing machine or develop agreements to share existing ones between entities.

Comments:

1) The Stage I reduction estimate is likely incorrect because of an overstated percentage of stations lacking the necessary Stage I piping.
2) Low emission gas cans assumes that many current gas can owners will trade theirs in when the new ones are available.
3) Low RVP gasoline assumes the pressure will be reduced from 7.8PSI to 7.0PSI when, in fact, the current average pressure is 7.38PSI.
4) Some TERMS such as traffic signalization and intersection widening can create safety conflicts for bicyclists and pedestrians because of increased speed on arterials. This may reduce the overall net air quality benefit because fewer people might bike or walk in general.
5) Expedited permitting for TOD development could be helpful, however, the City of Austin is streamlining their development application process anyway. This incentive has been mentioned and tried before with little success.
6) Increasing investment for demand side mgmt. programs by electric power providers is a very important measure when coupled with cost-effective programs. An opportunity that has not been well addressed is providing the right incentives that are easily accessible for the upgrade of rental units.
7) I believe rating the OZAD Program of medium effectiveness is overstating its current value in reducing emissions. The potential is there to develop a grass roots program that causes greater community concern for the challenge of protecting public health. If this happens, then the program would improve its effectiveness measurably.

8) The Clean Air Partners Program should be reviewed annually to determine cost-effectiveness relative to pollution reduction. Current CAP members should be asked to voluntarily move their commitment to 15% or beyond as they move closer to their initial 10% reduction commitment.

9) How does access mgmt. reduce VOC emissions?

10) Police Dept. ticketing was requested since 1995 when the City Council passed a resolution to enforce the State statute for smoking vehicles. The change in those ticketed has been minimal based on statistics received from the COA Municipal Court. Warnings are not tracked and might be providing an unverifiable benefit. Expanding the awareness for reporting smoking vehicles through the TCEQ program might yield greater environmental benefits.

11) The EPA Adopt-A-Bus program is based on an assumption that school districts have discretionary funds to contribute to upgrading their bus fleet. Their share of the cost for upgrades or new buses is 50%. Outreach should take place to determine whether the districts have any such discretionary funds to supplement funds raised by the Clean Air Force.

POSITION STATEMENT ON THE DRAFT CLEAN AIR ACTION PLAN

January 22, 2004

Air quality is an issue that impacts the entire community, from quality of life for individuals to the regulatory and business climate. As such, the Chamber has been involved in air quality efforts for many years to decrease health risks and avoid onerous mandates. The Chamber supported our Central Texas elected official's pursuit of an Ozone Flex Agreement as a voluntary maintenance program for compliance with the 1 Hour Ozone Standard. And, we support the current pursuit of an Early Action Compact to maintain the area in compliance with the 8 Hour Ozone Standard, since it keeps control of "how" compliance is achieved at the local level.

Ozone creating emissions come from a variety of sources throughout Central Texas. Therefore, it is key that the Clean Air Action Plan embraces the concept of fair-share in requiring emissions reductions from emitters in proportion to their contribution.

With some forty-five percent of area emissions from vehicles, addressing pollution of individual vehicles, commuting patterns and fuel options are integral to the success of the Clean Air Action Plan. The Clean Air Coalition should remain vigilant to ensure a successful Inspection and Maintenance Program is implemented for the three county region, and that cleaner fuels are made available at the gas pump.

The Greater Austin Chamber of Commerce has dedicated extensive time and energy to reviewing two strategies that most directly impact businesses and economic development: Commute Reductions Program and Off-Sets for NOx and VOCs.

The Greater Austin Chamber of Commerce Executive Committee hereby recommends the following:

1) Increase the threshold for Mandatory Participation in the Commute Reductions Program from employers with 100 or more employees at a given location to 200 or more. Based on an analysis of available employee numbers per employer (information regarding number of employees in a given location was not available) increasing the threshold to employers with 200 employees at a given location would result in a 50% reduction in number of employers impacted and maintains more than 85% of the impact on emissions.

   Ensure mandatory participation of all government entities exceeding this employee threshold.

Acknowledge that a good faith (best effort) participation in the current Clean Air Partners Program (pledged 10% emission reduction over a three year period) will satisfy compliance with this emission reduction measure.

Additionally, we encourage employers with less than 200 employees per site, to voluntarily participate in the Clean Air Partners Program, and specifically those employers that provide “paid” parking to their employees to consider participating in a voluntary "parking buy back program" (where it is revenue neutral to the employer).

2) Require 1:1 off-sets (pound for pound reduction) for new or expansion of existing Major Sources (>100 TPY) of NOx, but not for Major Sources of VOCs. Model results suggest that the area is significantly (5 to 1) more sensitive to changes in NOx levels than to changes in VOC levels. Furthermore, our area’s Point Sources account for 19% of the total NOx emissions but only 1% of the total VOC emissions.

As updated emissions inventory and modeling results become available, we believe it is appropriate to reconsider the requirements for each of these measures – i.e. should VOC emissions from point sources increase at a level greater than forecasted, the community should consider taking additional actions, or if other emissions are not increasing at the rate forecasted, it may be justified to require less levels of participation.

Affirmed by,

Rick Burciaga
2004 Board Chair

MICHAEL W. ROLLINS, CCE
President

RESOLUTION NO. 022404-X

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GEORGETOWN, TEXAS SUPPORTING THE ENVIRONMENTAL PROTECTION AGENCY AND THE CLEAN AIR ACTION PLAN FOR THE AUSTIN/ROUND ROCK METROPOLITAN STATISTICAL AREA AND THE IMPLEMENTATION OF THE OZONE POLLUTION CONTROL MEASURES IN THAT PLAN THAT SHOULD RESULT IN LOCAL ATTAINMENT OF THE 8-HOUR OZONE NATIONAL AMBIENT AIR QUALITY STANDARDS BY 2007.

WHEREAS, the local governments within the Austin/Round Rock Metropolitan Statistical Area (MSA) recognize that air quality monitor readings in the MSA indicate consistent monitored violations of the 8-hour ozone National Ambient Air Quality Standards (NAAQS) for the past several years; and

WHEREAS, the MSA currently monitors attainment of all Clean Air Act pollutants but is likely to be subject to a nonattainment designation for ozone by the US Environmental Protection Agency (EPA) prior to 2007; and

WHEREAS, EPA Region 6, the Texas Commission on Environmental Quality (TCEQ) and 12 local governments from the MSA entered into an Early Action Compact that should result in attainment of the 8-hour ozone NAAQS sooner than required under the standard nonattainment process, thereby benefiting public health; and

WHEREAS, the EAC is a memorandum of agreement between the local governments, EPA and TCEQ to develop and implement a detailed Clean Air Action Plan (CAAP) to attain the 8-hour ozone NAAQS by 2007 through measures implemented in a fair and equitable manner throughout the five-county region; and

WHEREAS, the EAC provides for the immediate return of the region to the standard nonattainment process if all agreement terms and milestones are not met; and

WHEREAS, the EAC and CAAP would achieve significant regional air quality and public health benefits by implementing ozone pollution control measures and attaining the 8-hour ozone NAAQS before otherwise required by the Federal Clean Air Act;

NOW, THEREFORE BE IT RESOLVED, that the City of Georgetown supports the EAC and the Clean Air Action Plan for the Austin/Round Rock MSA and the implementation of the ozone pollution control measures in that plan that should result in local attainment of the 8-hour ozone NAAQS by 2007.

PASSED AND APPROVED this 24th day of February, 2004.

APPROVED:

Gary Nelon
Mayor

ATTEST:

Sandra D. Lee
City Secretary

APPROVED AS TO FORM:

Patricia E. Carls
City Attorney

Res. 022404-X

EAC/CAAP Comments Tracking Spreadsheet

Updated: February 20, 2004

The following information is a summary of written comments received to date. These comments have been received in addition to feedback received from ongoing public involvement efforts, such as survey cards and stakeholder meetings.

FROM	DATE	SUMMARY OF COMMENT	HOW WE ADDRESSED COMMENT	RECOMMENDED ACTION
1 **Amy Johnson MoPac Boulevard Alliance.**	May 29, 2003	Would like us to consider an emissions offsets program to ensure no net increase of emissions from new roadways in the region.	Invited Ms. Johnson to talk to on-road mobile stakeholder group. They suggested she draft language.	Recommendation: Do not add measure to list since the suggested modeling is already being done on a transportation system level and the measure will only result in no net increase of emissions, not emission reductions. Additionally, the EAC Protocol requires the CAAP to include a Maintenance for Growth analysis through 2012 as well as a detailed Continuing Planning Process. The goal of the suggested measure will be addressed by the CAAP components that comply with these requirements. Add text to the CAAP explaining: 1) The on-road mobile future emission inventory development process, emphasizing that the inventories include all new regionally-significant roads expected to be operational during the time period reflected by the inventory and that the underlying population and employment assumptions reflect development and induced demand as a result of the new roads. (Cont. on pg. 2)
1a **Amy Johnson MoPac Boulevard Alliance.**	June 25, 2003	Contained draft language for measure.	Invited larger stakeholder group to discuss and provide comments	
1b **Alfred Reyes, Texas Nation Guard, Camp Mabry**	June 27, 2003	Disagreed with suggested measure. Argued that it will only increase congestion by slowing down road construction. Emissions offsets might come from light rail system or from a program developed when new roads are built.	Discussed at 7/24 EACTF meeting.	
1c **Skip Cameron, Bull Creek Foundation**	June 27, 2003	Disagreed with suggested measure. Argued it will only add to congestion to slow down road construction activities	Discussed at 7/24 EACTF meeting.	

1d	**Jeff Jack**	July 2, 2003	Agrees that we must assess the impact of all new roads, so that burden for added emissions do not fall some place else and further off load real costs of transportation system to another economic sector.	Discussed at 7/24 EACTF meeting.	2) Roadways should not be analyzed individually, but should be analyzed as part of the overall transportation system. A new road likely will affect other roads or transportation system components (for example other roads may have lower traffic volumes due to the new road), so an overall system analysis is needed to provide the best estimate of the vehicle emissions associated with new roadways
2	**Association of General Contractors (AGC)**	June 18, 2003	Objects to adding Contractor Health Days measure later in the process (April 13th, 2003) and want measure removed from list. States that Clean Air Act preempts state and local governments from restrictions on nonroad vehicles and engines. Contends that FHWA finds unacceptable air quality incentives in bidding process. States that TTI has completed a study showing technological-based solution are more effective than behavioral strategies such as proposed here.	None. Did not come to EACTF. Letter sent directly to elected officials	Ask AGC to propose an alternative measure that will achieve equivalent emission reductions. Leave measure on the list until an acceptable alternative measure is proposed.
3	**Mr. Lynn R. Weber**	June 20, 2003	OBD testing does not test older and dirtier cars, so serves no useful purpose. Should begin testing cars only after first four years. Should enact and enforce smoking vehicle laws. Should require gas stations to use cleaner fuels.	Discussed at 7/24 EACTF meeting and at on-road mobile stakeholder group 6/20.	Currently, one and two-year old cars are exempt. We do not recommend exempting for an additional two years because the fees collected on those vehicles help fund the Low Income Repair Assistance Program (LIRAP). Comments regarding enforcement of smoking vehicles are noted and we plan to address this significant source of pollution in the CAAP.

4	**Judge H.T. Wright Caldwell County**	June 23, 2003	Would like further consideration of Dr. Robert Habingreither's report that I&M should not be implemented unless all 5 counties agree to participate. Mentioned several factors that should be considered to present a balanced study.	Discussed at 7/24 EACTF meeting.	Agreed. Further consideration of these issues is necessary.
5	**Rick Smith**	June 30, 2003	To encourage people to buy more fuel-efficient cars, exempt them from I&M testing.		
6	**Jeff Jack**	July 2, 2003	Focus should be on VMT reductions, not necessarily technological fixes. Disagrees with Dr. Habingreither's suggestion to not test vehicles older than 10 years.	Discussed at 7/24 EACTF meeting.	State currently tests vehicles 2-24 years old and EACTF recommends we maintain those guidelines.
7	**Kevin Tuerff Austin**	August 25, 2003	Supports I&M and restricts on lawn and garden during high ozone days. Suggests better incentives for employers or increase number of minimum employees to 200 for a Trip Reduction program to be successful. Also suggests that all state employees stagger the work starting time on high ozone days.	Distributed to EACTF over email, 10/2; CAC meeting 10/15	
8	**Robert Whittaker, Jr. Georgetown**	Sep. 6, 2003	Suggests all gasoline in Texas be "reformulated gas" and be required to contain fuel cleaners. Also suggests instead of I&M program, the State should mandate that all motor vehicles comply with State and EPA standards. The cost of this service can be incorporated into the initial cost of the vehicle based on the projected service life of the vehicle.	Distributed to TAC over email, 10/2; CAC meeting 10/15	
9	**Johnny Wolf Wimberly**	Sep. 9, 2003	The following suggestion applies to all vehicles which are 10 years old or less: $1000 per year surcharge with vehicles that get 0-10 MPG, $500 per year for vehicles that get 10-20 MPG, no surcharge for vehicles that get 20-	Distributed to TAC over email, 10/2; CAC meeting 10/15	

			30 MPG, refund of $250 for vehicles that get 30 MPG or above.		
10	**Artie Berne Austin**	Sep. 9, 2003	Promotion of hydrogen fueled cars.	Distributed to TAC over email, 10/2; CAC meeting 10/15	
11	**People Organized in Defense of Earth and her Resources**	Sep. 11, 2003	Recommends school districts adopt policies for ozone action days including an alert flag on campus and not allowing buses to idle motors.	CAC meeting 10/15	
12	**People Organized in Defense of Earth and her Resources**	Sep. 11, 2003	Recommends that the Holly Power Plant be closed. Letter states that it is the largest stationary source of NOx in Travis County and it poses a health hazard to residents living near the plant.	CAC meeting 10/15	
13	**Frank Berezovytch Austin**	Sep. 13, 2003	I&M measures should not be implemented only in Travis County.	Letter sent to City of Austin. Distributed to TAC over email, 10/2; CAC meeting 10/15	
14	**Travis County Libertarian Party**	Nov. 3, 2003	V1 – Strongly opposed to I&M Measures. Supports only remote sensing TS1 – Oppose building bike and pedestrian facilities with air quality funds. Also oppose light rail and HOV lanes. Instead study on congestion pricing of roadways. TR2 – Opposes requiring new commercial buildings to have showers. TR4 – Suggests charging public employees $5/day for parking; $25/day on high ozone days. C1-C4 – Supports TxLED for all off road and diesels, at least during summer. Supports mandating TxLED	Fax sent to CAF. Comments also received at Travis County public meeting 11/15	

			in all public construction projects. (cont.) D1 & S1A – suggests these measures be voluntary. E5 – Strongly opposes tree planting. Some trees emit VOC's and people should be allowed to plant or remove at will on their property. Suggests a public education initiative of horticultural practices that are good for air quality. P – More power plants to the East or Southeast of Austin should be prohibited. P1 – Existing point sources that lack modern emission controls should be required to upgrade within 5 years. No new point sources to the East or South of Austin.		
15	**Amy Johnson, Mopac Blvd. Alliance**	Nov. 12, 2003	Gives the following suggestions: Reduce speed limit to 55 mph. Create HOV lanes. Create an air quality surcharge for trucks, SUV's and other vehicles not meeting stringent emission requirements. Create public campaign to educate public about higher emissions from trucks and SUV's. Include "induced traffic" in all models of new roadways. Facilitate Smart Growth in review of CAMPO's road building plan. Local governments and CAMPO should commit to spend 15% of all transportation dollars on bicycle lanes and 5% on sidewalks. Employers with 50 employees or more should have	Letter sent to EAC signatories.	

			shower facilities. All new buildings within a certain square footage (cont.) should include showers and bike racks and retrofit older buildings. Cities in region should commit to Smart Growth plans and include greenspace commitments.		
16	**Trey Rushing**	Nov. 12, 2003	Suggests mandating City and County government use only variable time traffic signal controls and speed up all road construction projects. Also suggests installing GPS units on all vehicles and imposing pollution taxes based on a mileage scale. Could incorporate this program with the I&M program.		
17	**John F. Yeaman**	Nov. 13, 2003	To encourage buying of hybrid cars, business could set aside optimum parking with signs that say, "hybrid parking only". No legal authority attached.		
18	**Verbal Comments received at Public Meetings**	Oct – Nov 2003	Barbara Cilley from Commissioner Daugherty's office would like to see the model before making recommendations on the measures. Tom Smith, from Public Citizen, recommends our region adopt a universal Green Building program. There were also citizens requesting easier bike access in and around Austin.		
19	**Scott Johnson**	Nov. 21, 2003	Believes more needs to be done to reduce emissions. Recommends having an implementation plan for measures. For full list of strategies, ideas and comments, contact the Clean Air Force.		

20	**Ms. Jeannon Kralj Austin, TX**	Dec. 5, 2003	Believes the plan is inappropriate for Travis County at this time. Encourages the County Commissioners to vote against the CAAP.		
21	**Jim Skaggs**	Dec. 24, 2003	Has concerns about the I&M program. States that emissions from gasoline vehicles are dropping and emission tests may only be needed for a few more years and therefore not cost effective. Suggests changing the requirement to cars which are more than 5 years old.		
22	**Bill Oswald Flint Hills**	Jan. 21, 2004	Doesn't agree with the EACTF requesting TCEQ to disallow Koch's alternative plan of bringing low sulfur gas to the region instead of TXLED.		
23	**J. Kevin Ward Texas Water Development Board**	Jan. 21, 2004	TWDB supports strategies to improve air quality and encourages staff to use commute alternatives and OZAD's are announced to staff. They are supportive of our efforts.		
24	**Greater Austin Chamber of Commerce**	Jan. 22, 2004	GACC supports an I&M program in the 3 County area. Recommends changes to the following measures: A3 – Increase threshold for mandatory participation in the Commute Reduction program to employers with 200 or more employees. A11 – Require 1:1 off-sets of NOx, but not VOC's.		
25	**Pat Fogarty Texas State University – San Marcos**	Jan. 27, 2004	Addressed CAAP measures that would affect the university: A1 – Testing of the University's vehicles would be costly, but doable, and proving students vehicles meet		

			emission standards would be an administrative burden. B5 – TSU already has showers, bike racks, and preferential carpool parking places. B18 – Do not think thermal storage is cost effective for the University. B36 – Believes contract provisions addressing construction related emissions on OZAD's will be costly to implement. And making a contractor stop a particular activity on an ozone action day would make a big impact on the project.		
26	**Bette Pritchett**	Jan. 31, 2003	Would like more idling restrictions and no lights on thoroughfares like Loop 360. Stricter enforcement and penalties for polluting vehicles and industries.		
27	**Amy Johnson, Mopac Alliance**	Feb. 9, 2004	In addition to previous suggestions, the MPA would also like to see the use of the sensitive Smart Mobility travel model when modeling travel demand, There are also concerns expressed about the assumptions in the air quality model, for example the basis for the amount of reductions for an I&M program. The MBA also states that commitments for green space should be in the CAAP and integrated with transportation and air quality issues.		
28	**Scott Johnson**	Feb. 16, 2004	Suggested the following measures be included as regulations in the plan: electric lawnmower exchange, electric golf and utility carts, solar powered signboards, organic fertilizers, lighter		

			fluid that meets air quality standards, require hand-held lawn/garden equipment to be model 2005 by 2007, smoking marine engine program, sustainable purchasing protocol, lower NOx water heaters, spill collector practices at gas stations, regulate fast-food restaurants that use industrial charbroilers.		
29	**Mike Albrecht**	Feb. 17, 2004	Would like to see anti-idling recommendation in the plan.		
30	**Ramon Alvarez, Environmental Defense**	Feb. 18, 2004	Supported the plan and made the following technical comments: Present additional analysis in Section 4.5 that quantifies the impact of other states on our region. Section 1.3.3 should be expanded to call on EPA to require the maximum level of NOx reductions. Complete additional future modeling with more than one episode. Improve documentation of maintenance analysis. The maintenance analysis should account for the actual benefits from the “low-NOx rebuild program”. Also account for induced driving from new or expanded roads.		

February 18, 2004 was the final date for public comments.

ENVIRONMENTAL DEFENSE
finding the ways that work

February 18, 2004

Ms. Cathy Stephens
CAMPO
PO Box 1088
Austin, Texas 78767

Ms. Deanna Altenhoff
Clean Air Force of Central Texas
2512 S. IH-35, #200
Austin, Texas 78704

Re: Comments on Draft Austin/Round Rock MSA Clean Air Action Plan for the Early Action Compact

Dear Ms. Stephens and Ms. Altenhoff,

Environmental Defense appreciates the opportunity to submit these comments on the January 31, 2004 draft of the Central Texas Clean Air Action Plan.

Ozone air pollution presents a serious health risk to the residents of Central Texas, especially asthmatic children and other sensitive individuals. As you know, Environmental Defense has strongly encouraged state and local governments to take proactive steps to reduce ozone-causing emissions in Central Texas. Accordingly, we are generally pleased with the breadth and diversity of emission reduction measures proposed in the plan. We commend the Early Action Compact Task Force for their hard work in developing the draft plan and for aggressively soliciting and considering public input.

SUPPORT FOR MEASURES IN THE PLAN

We support the emission reduction measures proposed in the plan, which in their totality represent an appropriate level of commitment for a region whose design value hovers near the 8-hour NAAQS. We believe these measures will prove essential to ensuring the region attains the NAAQS by 2007, especially in light of the inherent uncertainty in the photochemical modeling used to predict compliance.

TECHNICAL COMMENTS

We urge you to consider the following technical comments and make any necessary adjustments before you finalize and submit the plan to TCEQ and EPA.

Transport assessment. Section 4.5, when completed, will provide valuable information to bolster and, if the Clean Air Coalition chose to do so, strengthen the policy statement on transport made in Section 1.3.3. We urge you, time and funding permitting, to present additional analysis in Section 4.5 that quantifies the impact of other states like Louisiana, Oklahoma, Arkansas, Kansas Alabama, and Missouri on the Central Texas region. This information would be particularly valuable and timely since the EPA is considering the appropriate level of emission reductions and affected states under its recently proposed Interstate Air Quality Rule. Finally, policy statement 1.3.3 should be expanded to call on EPA to require the maximum level of NOx reductions in states contributing to ozone levels in Central Texas.

Design Value. We support the use of 89 ppb as the appropriate design value as outlined in Section 4.4.

Future Modeling Work. The Clean Air Action Plan relies on a single modeling episode. The January 2004 Attainment Maintenance Analysis indicates that new modeling episodes will not be developed until after the TXAQS II field study is completed in 2006. This schedule is inconsistent with the region's need to ensure compliance by 2007 and must therefore be expedited. A single modeling episode is not a sufficiently robust basis on which to base the fate of the Clean Air Action Plan. Resources should be allocated to minimize any remaining uncertainties in the current modeling analysis and complete additional modeling to soon enough to confirm that attainment will in fact be achieved by 2007 with the measures in this plan, and if not, to adopt additional measures.

Improve documentation of maintenance analysis. In general, we found the documentation in Chapter 6 of the Draft Plan and the January 2004 Attainment Maintenance Analysis difficult to understand and were unable to discern what assumptions were made about key variables in the growth projection. For example, we were confused by Table 6.4, which reports emissions reductions in units of VMT. How were the emission factors in Table 6.6 derived? The 1999 emissions factor of 2.4 g/mi of NOx seems high. Was the anticipated growth in the high-emitting, on-road heavy duty diesel categories considered in the overall projected decline in emissions? The maintenance analysis should account for the fact that the emission reduction benefits due to the diesel engine "low-NOx rebuild program" in a consent decree between EPA and engine manufacturers are less than one-third the level assumed in Mobile 6. The maintenance analysis should also account for the well-known effects of induced driving from new or expanded roads built outside of the existing urban core. Induced driving would result in higher VMT than otherwise projected by standard travel demand models.

Please do not hesitate to contact me at 478-5161 if you have any questions.

Sincerely,

Ramón Alvarez, Ph.D.
Scientist

Texas Department of Transportation

P.O. DRAWER 15426 • AUSTIN, TEXAS 78761-5426 • (512) 832-7000

March 22, 2004

Dear Clean Air Action Plan Decision Maker,

As the District Engineer of the Austin District, I strongly support the Early Action Compact (EAC) and Clean Air Action Plan (CAAP).

Our mission is to provide safe, efficient and effective mobility for Central Texans and we support the regional effort to improve air quality. Both mobility and good air quality are important to ensure regional economic development and quality of life, making Central Texas a good place to live and work. We believe efficient mobility and good air quality are essential, achievable and mutually beneficial goals; one should not preclude the other. The EAC and CAAP are important tools for reaching these goals.

Because motor vehicles are a primary source of regional NOx and VOC emissions, we endorse the CAAP measures designed to reduce transportation related emissions, including the inspection and maintenance measure. While transportation system improvements will reduce congestion-related emissions, additional measures will be needed to ensure clean air through 2007. Measures that address vehicle operations, such as clean fuels and the vehicle inspection and maintenance program are also needed

The EAC defers the effective date of any future nonattainment designation through 2007, as long as the terms of the agreement are met. Nonattainment requirements include transportation conformity, intended to ensure that future vehicle emissions will not exceed levels needed to comply with Federal air quality standards. While we agree with the intent, in practice, transportation conformity requirements are a significant burden on transportation resources. Failure to comply with the requirements can result in Federal transportation funding being withheld and delay badly needed transportation system improvements.

The EAC and CAAP are a preferred alternative to nonattainment, because they allow local plan development, can be implemented sooner and do not put transportation funding at risk. We commend your leadership and proactive approach in approving the EAC and CAAP as the way Central Texas will ensure the clean, healthy air needed to keep the region healthy, both physically and economically, for the foreseeable future.

Sincerely,

Robert B. Daigh, P.E.
Austin District Engineer

Central Texas
REGIONAL MOBILITY AUTHORITY

13640 Briarwick Drive
Suite 200
Austin, Texas 78729-1706
Phone: (512) 996-9778
Fax: (512) 996-9784
http://www.ctrma.org

Executive Director:
Mike Heiligenstein

Board of Directors:
Robert E. Tesch
Chairman

Lowell Lebermann
Vice-Chairman

Robert L. Bennett
Treasurer

Henry H. Gilmore

James H. Mills

David Singleton

Johanna Zmud, Ph.D.

March 22, 2004

Dear Clean Air Action Plan Decision Maker,

As a transportation manager, I strongly support the Early Action Compact (EAC) and Clean Air Action Plan (CAAP) and recommend that you approve the final CAAP. In particular, the proposed vehicle inspection and maintenance program is the most effective measure available to significantly reduce motor vehicle emissions, our major pollution source. While transportation system improvements will reduce congestion-related emissions, measures to reduce emission from vehicle operations are also needed. The inspection and maintenance program will ensure that vehicles are running properly and not emitting excessive pollution. The inspection and maintenance program can also be implemented relatively quickly, resulting in the significant short-term emission reductions needed to achieve clean air by 2007.

The EAC defers the effective date of any future non-attainment designation through 2007, as long as the terms of the agreement are met. Federal non-attainment requirements place restrictions on industry and new highway construction, which can impact economic development and quality of life.

The EAC and CAAP are a preferred alternative to non-attainment, since they allow local plan development and the emission reduction measures can be implemented sooner than under the non-attainment process. The inspection and maintenance program is an essential component of the CAAP. I commend your leadership and proactive approach in approving the EAC and CAAP as the way Central Texas will ensure the clean, healthy air needed to keep the region healthy, both physically and economically, for the foreseeable future.

Mike Heiligenstein, Executive Director
Central Texas Regional Mobility Authority

CAMPO Capital Area Metropolitan Planning Organization

March 22, 2004

Dear Clean Air Action Plan Decision Maker,

As the Executive Director of CAMPO, I strongly support the Early Action Compact (EAC) and the Clean Air Action Plan (CAAP) and recommend that you approve the final CAAP. In particular, the proposed vehicle inspection and maintenance program is the most effective measure available to significantly reduce motor vehicle emissions, our major pollution source.

While transportation system improvements will reduce congestion-related emissions, measures to reduce emission from vehicle operations are also needed. The inspection and maintenance program will ensure that vehicles are running properly and not emitting excessive pollution. The inspection and maintenance program can also be implemented relatively quickly, resulting in the significant short-term emission reductions needed to achieve clean air by 2007.

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The EAC and CAAP are a preferred alternative to nonattainment, since they allow local plan development and the emission reduction measures can be implemented sooner than under the nonattainment process. The inspection and maintenance program is an essential component of the CAAP. We commend your leadership and proactive approach in approving the EAC and CAAP as the way Central Texas will ensure the clean air needed to keep the region healthy, both physically and economically, for the foreseeable future.

Sincerely,

Michael R. Aulick

Michael R. Aulick
Executive Director

1011 San Jacinto St. • 2nd Floor • P.O. Box 1088 • Austin, Texas 78767-1088
512.974.2275 • (Fax) 512.974.6385 • campo@ci.austin.tx.us

SETON HEALTHCARE NETWORK

CHARLES J. BARNETT
PRESIDENT & CEO
1201 WEST 38TH STREET
AUSTIN, TEXAS 78705-1056
(512) 324-1902
FAX (512) 459-5629
EMAIL: cbarnett@seton.org

Members of the
SETON Healthcare Network

AUSTIN ACADEMIC MEDICINE ASSOCIATES

AUSTIN MEDICAL EDUCATION PROGRAMS

BRACKENRIDGE HOSPITAL

SETON CEDAR PARK

CHILDREN'S HOSPITAL FOUNDATION OF AUSTIN

CHILDREN'S HOSPITAL OF AUSTIN

SETON EDGAR B. DAVIS

SETON FUND

SETON HEALTH PLAN

SETON HIGHLAND LAKES

SETON LOCKHART HEALTH CENTER

SETON McCARTHY COMMUNITY HEALTH CENTER

SETON MEDICAL CENTER

SETON NORTHWEST HOSPITAL

SETON PFLUGERVILLE

SETON PHYSICIAN HOSPITAL NETWORK

SETON SHOAL CREEK

SETON SOUTH COMMUNITY HEALTH CENTER

SETON SOUTHWEST HEALTHCARE CENTER

SETON TOPFER COMMUNITY HEALTH CENTER

Our mission inspires us to care for and improve the health of those we serve with a special concern for the sick and the poor.

We are called to Service of the Poor, Reverence, Integrity, Wisdom, Creativity, and Dedication.

ASCENSION HEALTH

March 19, 2004

The Honorable Will Wynn
Mayor, City of Austin
P.O. Box 1088
Austin, TX 78702

Dear Mayor Wynn:

Seton employs nearly 7000 people from the Central Texas region within our healthcare network. We understand that air quality is an issue that impacts our community, from the quality of life for our employees to the way we perform our business. We appreciate the proactive approach that you and other elected officials from the Clean Air Coalition have taken, first with the Ozone Flex Plan and now with the Early Action Plan, to retain local control regarding "how" our area complies with attainment of the Ozone National Ambient Air Quality Standards. Your willingness to actively involve a cross-section of stakeholders from Central Texas to determine how we can most effectively achieve our emission reductions is to be commended. In doing so, you have challenged everyone across the region to accept accountability for their fair share of the emissions reductions based upon their contribution to the problem. We support adopting the Clean Air Action Plan that has been developed as a result of this process.

While the Clean Air Action Plan addresses numerous emission reduction measures, we want to emphasize several of these strategies as critical to the overall program. First is the implementation of an Inspection and Maintenance Program. While many concerns exist regarding such a program, the reality is that we do not have a more cost-effective program available to us, at this point in time, that can address the single largest source of emissions in our area – mobile sources. Second, we want to encourage you to continue to work with TCEQ and our local fuel suppliers to bring cleaner diesel fuels to our pumps. The impact of this control measure has been limited by an agreement between TCEQ and the supplier. Finally, we would reiterate that as a region, we should be willing to revise our emissions reduction strategies, as appropriate, as new information becomes available to us, and as results of our current efforts are realized. As a Clean Air Partner, we want to assure you that Seton is committed to contributing to the emissions reductions in the area by participating in this important commute reduction program.

Thank you again for your efforts to both proactively address our environmental compliance issues and retain local control of the process. Each of these elements is integral to the recruitment and retention of high quality businesses and employees to the region.

Sincerely,

Charles J. Barnett

Charles J. Barnett

cc: Council Member Daryl Slusher
Council Member Betty Dunkerley
Council Member Brewster McCracken
Council Member Raul Alvarez
Mayor Pro Tem Jackie Goodman
Council Member Danny Thomas
Kathleen White, Chairman, TCEQ
Margaret Hoffman, Executive Director, TCEQ
Cathy Stephens, Chair, EAC Task Force

Daron K. Butler
Executive Vice President
Land Development Services

400 West 15th Street
Suite 500
Austin, Texas 78701
Tel: (512) 457-7706
Fax: (512) 472-7519
daron.butler@tcb.aecom.com

TurnerCollie & Braden Inc.
Engineers • Planners • Project Managers

March 23, 2004

The Honorable Will Wynn
Mayor, City of Austin
P.O. Box 1088
Austin, TX 78702

Re: **Clean Air Action Plan**

Dear Mayor Wynn:

Turner Collie & Braden Inc. employs 90 people from the Central Texas region in our Austin Office. We know that air quality impacts our community, from the quality of life for our employees to the way we perform our business. We appreciate the proactive approach that you and other elected officials from the Clean Air Coalition have taken to retain local control of how we comply with attainment of Ozone National Ambient Air Quality Standards.

Your willingness to actively involve a cross-section of Central Texas stakeholders is commended. In doing so, you have challenged everyone to accept accountability for their fair share of the emissions reductions based upon their contribution to the problem. We support adopting the Clean Air Action Plan developed as a result of this process.

While the Clean Air Action Plan addresses numerous emission reduction measures, we want to emphasize these strategies as critical to the overall program.

- First is the implementation of an Inspection and Maintenance Program. While concerns exist regarding this program, we do not in reality have a more cost-effective program available that can address the largest source of emissions in our area – mobile sources.

- Second, we encourage you to continue to work with TCEQ and our local fuel suppliers to bring cleaner diesel fuels to our pumps.

- Finally, we should revise our emissions reduction strategies as new information becomes available to us, and as results of our current efforts are realized. As a Clean Air Partner, we want to assure you that TCB is committed to contributing to the emissions reductions in the area by participating in the commute reduction program.

Turner Collie & Braden Inc.

Thank you for your efforts to proactively address our environmental compliance issues and help us retain local control of the process. Each of these elements is integral to the recruitment and retention of high quality businesses and employees to the region.

Sincerely,

Daron K. Butler

Daron K. Butler
Executive Vice President

DKB:bas

cc: Council Member Daryl Slusher
Council Member Betty Dunkerley
Council Member Brewster McCracken
Council Member Raul Alvarez
Mayor Pro Tem Jackie Goodman
Council Member Danny Thomas
Kathleen White, Chairman, TCEQ
Margaret Hoffman, Executive Director, TCEQ
✓ Cathy Stephens, Chair, EAC Task Force

Environmental Defense
Texas Office of Public Citizen
Sustainable Energy And Sustainable Development (SEED) Coalition

March 19, 2004

The Honorable Samuel T. Biscoe
County Judge
Travis County
P.O. Box 1748
Austin, TX 78767

Re: Comments on Draft Austin/Round Rock MSA Clean Air Action Plan for the Early Action Compact

Dear Judge Biscoe,

On behalf of our organizations, we urge you to approve the above referenced Clean Air Action Plan.

Ozone air pollution presents a serious health risk to the residents of Central Texas, especially asthmatic children and other sensitive individuals. Poor air quality also adversely affects the region's economy and quality of life. Accordingly, our groups have strongly encouraged state and local governments to take proactive steps to reduce ozone-causing emissions in Central Texas.

We support the emission reduction measures proposed in the plan, which in their totality represent an appropriate level of commitment for a region whose design value hovers near the 8-hour National Ambient Air Quality Standard. We believe the proposed measures will prove essential to ensuring the region attains the standard by 2007, especially in light of the inherent uncertainty in the photochemical modeling used to predict compliance, and natural variations in the weather.

We commend the Clean Air Coalition of Central Texas and the Early Action Compact Task Force for their hard work in developing the draft plan and for aggressively soliciting and considering public input.

We appreciate the opportunity to provide these comments. Please do not hesitate to contact Jim Marston at 478-5161 if you have any questions or if we can be of any assistance.

Sincerely,

Jim Marston	Tom "Smitty" Smith	Karen Hadden
Regional Director	Director	Executive Director
Environmental Defense	Texas Office of Public Citizen	SEED Coalition

cc: Travis County Commissioners

URS

18 March 2004

The Honorable Will Wynn
Mayor, City of Austin
P.O. Box 1088
Austin, TX 78702

Dear Mayor Wynn:

URS employs nearly 600 people from the Central Texas region in our Austin Office. We understand that air quality is an issue that impacts our community, from the quality of life for our employees to the way we perform our business. We appreciate the proactive approach that you and other elected officials from the Clean Air Coalition have taken, first with the Ozone Flex Plan and now with the Early Action Plan, to retain local control regarding "how" our area complies with attainment of the Ozone National Ambient Air Quality Standards. Your willingness to actively involve a cross-section of stakeholders from Central Texas to determine how we can most effectively achieve our emission reductions is to be commended. In doing so, you have challenged everyone across the region to accept accountability for their fair share of the emissions reductions based upon their contribution to the problem. We support adopting the Clean Air Action Plan that has been developed as a result of this process.

While the Clean Air Action Plan addresses numerous emission reduction measures, we want to emphasize several of these strategies as critical to the overall program. First is the implementation of an Inspection and Maintenance Program. While many concerns exist regarding such a program, the reality is that we do not have a more cost-effective program available to us, at this point in time, that can address the single largest source of emissions in our area – mobile sources. Second, we want to encourage you to continue to work with TCEQ and our local fuel suppliers to bring cleaner diesel fuels to our pumps. The impact of this control measure has been limited by an agreement between TCEQ and the supplier. Finally, we would reiterate that as a region, we should be willing to revise our emissions reduction strategies, as appropriate, as new information becomes available to us, and as results of our current efforts are realized. As a Clean Air Partner, we want to assure you that URS is committed to contributing to the emissions reductions in the area by participating in this important commute reduction program.

URS Corporation
P.O. Box 201088
Austin, TX 78720-1088
9400 Amberglen Boulevard
Austin, TX 78729
Tel: 512.454.4797

URS

Thank you again for your efforts to both proactively address our environmental compliance issues and retain local control of the process. Each of these elements is integral to the recruitment and retention of high quality businesses and employees to the region.

Regards,

W David Balfour

W. David Balfour
Senior Vice President

WDB:mh

cc: Council Member Daryl Slusher
Council Member Betty Dunkerley
Council Member Brewster McCracken
Council Member Raul Alvarez
Mayor Pro Tem Jackie Goodman
Council Member Danny Thomas
Kathleen White, Chairman, TCEQ
Margaret Hoffman, Executive Director, TCEQ
Cathy Stephens, Chair, EAC Task Force

RESOLUTION NO. 383

RESOLUTION IN SUPPORT OF EARLY ACTION COMPACT (EAC) CLEAN AIR ACTION PLAN FOR THE AUSTIN/ROUND ROCK METROPOLITAN STATISTICAL AREA (MSA

THE STATE OF TEXAS §
§
COUNTY OF TRAVIS §

WHEREAS, the local governments within the Austin/Round Rock Metropolitan Statistical Area (MSA) recognize that air quality monitor readings in the MSA indicate consistent monitored violations of the 8-hour ozone National Ambient Air Quality Standards (NAAQS) for the past several years; and

WHEREAS, the MSA currently monitors attainment of all Clean Air Act pollutants but is likely to be subject to a nonattainment designation for ozone by the US Environmental Protection Agency (EPA) prior to 2007; and

WHEREAS, EPA Region 6, the Texas Commission on Environmental Quality (TCEQ) and 12 local governments from the MSA entered into an Early Action Compact that should result in attainment of the 8-hour ozone NAAQS sooner than required under the standard nonattainment process, thereby benefiting public health; and

WHEREAS, the EAC is a memorandum of agreement between the local governments, EPA and TCEQ to develop and implement a detailed Clean Air Action Plan (CAAP) to attain the 8-hour ozone NAAQS by 2007 through measures implemented in a fair and equitable manner throughout the five-county region; and

WHEREAS, the EAC provides for the immediate return of the region to the standard nonattainment process if all agreement terms and milestones are not met; and

WHEREAS, the EAC and CAAP would achieve significant regional air quality and public health benefits by implementing ozone pollution control measures and attaining the 8-hour ozone NAAQS before otherwise required by the Federal Clean Air Act; and

WHEREAS, the City of Rollingwood, due to its particular transportation and business infrastructure, is not required to implement specific emission reduction measures, and

WHEREAS, the City of Rollingwood supports the EAC signatories and anticipates the benefits of cleaner air for all Central Texans;

THEREFORE, IT IS RESOLVED AS FOLLOWS:

Section 1. The Rollingwood City Council supports the EAC and Clean Air Action Plan for the Austin/Round Rock MSA and the implementation of the ozone pollution control measures in that plan that should result in local attainment of the 8-hour ozone NAAQS by 2007.

Passed and approved this 18th day of February, 2004.

THE CITY OF ROLLINGWOOD, TEXAS

By: _____
Thom Farrell, Mayor

ATTEST:

Carole Gonynor
Carole Gonynor, Acting City Secretary

183223-1 02/26/2004

-----Original Message-----
From: Heather Evans [mailto:HEVANS@tceq.state.tx.us]
Sent: Wednesday, February 18, 2004 2:57 PM
To: cathy.stephens@campotexas.org; bgill@capco.state.tx.us
Cc: Kate Williams
Subject: TCEQ comments

Thank you for the opportunity to provide comments on the Preliminary Clean Air Action Plan for the Austin EAC area. We would also like to thank you for allowing us to meet with the Austin EAC leadership yesterday to discuss specific concerns associated with various control measures being considered.

We continue to have concerns about two of the measures - Low Reid Vapor Pressure and Offsets for Point Sources. Additionally we would like to further investigate some of the ideas discussed yesterday with respect to programs like Heavy Duty Diesel Idling, Commute Emission Reductions, and the various area source measures before submitting additional comments. A letter is currently being drafted for Margaret Hoffman's signature which will address our comments in greater detail. We plan to get the letter to you as soon as possible as we understand the need to have these detailed comments prior to the Clean Air Coalition meeting on February 25.

Please do not hesitate to call if you have any questions.

Heather

Have you inhaled your Diesel exhaust today?

Did you know that diesel exhaust fumes are more dangerous to the human body than regular gasoline emissions? Diesel spreads chemicals into the air that cause cancer and lung disease, especially in children and the elderly.

A great way to safeguard yourself and others is by not idling your engine.

Protect yourself, your passengers, and your community.

Please - Don't idle your diesel engine.

Is your comfort and convenience more important than your neighbors' breathing?

Anti-Idling Laws Exist in Many States, and are coming to Texas.

For more information, contact:

U.S. Environmental Protection Agency (EPA)

1-800-424-8802

http://www.epa.gov/otaq/diesel.htm

or

Texas Commission on Environmental Quality (TCEQ)

1-888-777-3186 or 512-339-2929

Environmental Violations Hot Line

http://www.nrdc.org/bushrecord/airenergy_vehicles.asp#1305

"Diesel engines emit roughly two-thirds of vehicle-related particulate (or soot) emissions nationally, and almost one-fourth of the country's total emissions of nitrogen oxides (NOx), the main ingredient in smog. Nonroad diesel engines -- such as bulldozers, backhoes, cranes, earthmovers, excavators, tractors, combines, portable generators and airport equipment -- account for 44 percent of soot emissions and 12 percent of nitrogen oxide emissions from mobile sources nationwide, the EPA estimated.

Scientists and doctors have linked diesel emissions to many respiratory and cardiovascular health problems. In fact, off-road diesel engines are second only to power plants in emissions associated with lung cancer, asthma, and other health threats. The new rules would force diesel manufacturers to use new technology to slash cancer-causing particulate emissions by up to 95 percent and cut NOx emissions by up to 90 percent. These measures would avoid more than 9,500 premature deaths and hundreds of thousands of asthma attacks annually. The engine requirements would be phased in between 2008 and 2014.

"Diesel engines are the dirtiest engines, fouling every urban, suburban and rural community," said Rich Kassel, NRDC senior attorney and founder of its Dump Dirty Diesels Campaign. "Cleaning them up will benefit every breathing American, and ultimately will save thousands of lives every year." "