



March 22, 2010

The Honorable Lisa P. Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Via Fax: 202.566.9744

Dear Administrator Jackson:

The Illinois MPO Advisory Council is comprised of thirteen metropolitan planning organizations (MPO) that collectively plan and program transportation improvements in Illinois that directly impact nearly 12.5 million people, indirectly impact millions more and have a significant role in the state and national economies. Through the MPO process, entities are responsible for developing regional transportation plans including complying with the transportation conformity process as per the Clean Air Act (CAA) Section 176(c) to ensure that federally supported highway and transit projects are consistent with state air quality implementation plans (SIPs).

The Council supports air quality standards that enhance the health of our citizens and the vitality of our local, state and national economies. We also applaud the strides made in producing cleaner vehicles as a result of national standards. Diesel engines will continue to be cleaner based on current and emerging technology and standards. Gasoline engines are getting better mileage and releasing cleaner emissions because of changes in fuel enhancements. Use of alternative transportation modes will continue to grow. Energy production, especially in coal-fired power plants, will continue to reduce negative environmental impacts through improved technology and revised federal regulations. Revising the ozone standards should be considered within the context of these positive developments and their expected or demonstrated air quality improvement.

We respectfully submit our comments in consideration to the proposed lowering of the NAAQS ground level Ozone standards for Docket# EPA-HQ-OAR-2005-0172.

Comment #1 - Setting an ozone standard that is realistically obtainable for MPOs

The MPO Advisory Council believes lowering the ozone standard below .70 parts per million (ppm) would be detrimental because it will dramatically reduce economic activity while trying to determine if and when that standard can be achieved. Establishing the standard at .70 ppm, St. Louis and Chicago remain nonattainment, but medium and small-sized metropolitan areas like Decatur, Bloomington and Peoria would be added. If the standard is set at .65 ppm, the Quad Cities area, Champaign, Effingham and Rockford, as well as three other rural monitors located in the State, would also be added. At .60 ppm, every monitor in the State of Illinois, the entire Midwest and virtually every metropolitan region in the United States would be out of attainment. It would be extremely difficult for many metropolitan areas to obtain those levels through transportation conformity requirements. While larger mega-regions, such as St. Louis and Chicago, have dealt with nonattainment issues, mid-sized MPOs, comparable to Rockford and Peoria, would require additional resources and specialized staffing to enable them to meet basic transportation conformity requirements.

Chairman, Cameron Moore (CUATS), Vice Chair, Randy Blankenhorn (CMAP), Secretary/Treasurer, Terry Kohlbus (PPUATS)

Bi-State Regional Planning Commission
Champaign Urban Area Transportation Study
Chicago Metropolitan Agency for Planning
Danville Area Transportation Study
Decatur Area Transportation Study

DeKalb-Sycamore Transportation Study
East-West Gateway Council of Governments
Kankakee Area Transportation Study
McLean County Regional Planning Commission

Peoria/Pekin Urbanized Area Transportation Study
Rockford Metropolitan Agency for Planning
Springfield Area Transportation Study
Stateline Area Transportation Study

Comment #2- Open Up Clean Air Act

The Council recommends that the Clean Air Act be reconsidered to enable the EPA include economic considerations in setting realistic, achievable standards. The Clean Air Act is written in such a way that regulations are put in place, without considering their economic implications. If areas that are currently centers for manufacturing and commerce are unable to meet air quality standards, those regions become unattractive because of non-attainment designations. A likely consequence is that businesses will move to other locations that are currently in attainment which may result in unintended sprawl. Or they may wind up offshore.

We suggest that voluntary emission reduction solutions should be addressed in the reauthorization of the transportation bill. As the National Association of Regional Councils did in the writing of SAFETEA LU, some air quality issues were addressed by MPOs. Issues related to background ozone levels and how they influence transportation conformity should be addressed as part of these discussions. The current structure does not permit the EPA to study natural background ozone levels but only the health effects. We believe there is an opportunity to make improvements on how either the reauthorization of the transportation bill or the Clean Air Act can properly address this issue in a sustainable manner.

Furthermore, with the lack of acknowledgement for economic considerations and the reduction of the ozone standards, Illinois will join many states across the country in developing areas of advantage and disadvantage. This is due to the fact that the entire State of Illinois is not monitored. Those areas that do not have a monitor may be placed at a vantage point.

Comment #3 – Increase the level of resources

Each time standards are lowered, it increases the number of affected areas. In order to access different monies to meet these standards in the most efficient way, the EPA has effectively decreased the availability of funds to accomplish emission reductions without coordination with other regulations and requirements that may support national air quality goals. With regard to the proposed secondary standard, if implemented, there should be further discussion regarding the transportation conformity aspects. There is a need to investigate what these aspects are and what their ramifications would be in the transportation sector, as well as other areas. There is a further necessity for discussions into the secondary standard as well as transportation conformity. What is the relationship between the two? This issue should be vetted thoroughly to provide MPOs with the best possible resources.

Respectfully,

Cameron Moore
Chairman
Illinois Metropolitan Planning Organization Advisory Council

cc: Governor Pat Quinn, State of Illinois
Secretary Gary Hannig, Illinois Department of Transportation
Director Douglas P. Scott, Illinois Environmental Protection Agency