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MARICOPA ASSOCIATION of GOVERNMENTS

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August 6, 2002

AUG - 6 2002
EPA AIR DOCKET

Air and Radiation Docket and Information Center
Docket Number A-2001-31
U.S. Environmental Protection Agency
401 M Street, SW
Room 1500 (Mail Code 6102)
Washington, DC 20460

RE: Implementation of the National Ambient Air Quality Standard for Eight Hour Ozone

Dear Sir:

The Maricopa Association of Governments appreciates the opportunity to submit comments on various options regarding the implementation of the National Ambient Air Quality Standard for eight hour ozone. MAG serves as the designated Regional Air Quality Planning Agency for the Maricopa County nonattainment area and the designated Metropolitan Planning Agency for transportation. The MAG comments address the classification of areas, attainment dates, transport, transportation conformity and Congestion Mitigation Air Quality Funds (CMAQ) Implications (attachment).

Within the Maricopa area, a wide variety of air quality control measures are being implemented by the State and local governments. Several of these measures are funded through the federal CMAQ Program. In addition, the CMAQ Program has been instrumental in funding control measures for the transportation conformity analyses. As a result of these aggressive efforts, there have been no violations of the one hour ozone standard or carbon monoxide standard for the last five years.

Again, the Maricopa Association of Governments appreciates the opportunity to submit comments on the implementation of the eight hour ozone standard. We will look forward to working with the Environmental Protection Agency on these important air quality issues. If you have any questions, please contact Lindy Bauer or me at (602) 254-6300.

Sincerely,

Dennis Smith
Interim Executive Director

MAG COMMENTS ON THE IMPLEMENTATION OF THE NEW EIGHT HOUR OZONE STANDARD

Issue: Classification of Areas

- The Environmental Protection Agency should use the actual monitoring data for the three most recent years at the time of designation, rather than an older, higher design value.

Issue: Attainment Dates

- The Environmental Protection Agency should take into account the benefits from the federal Tier II Light Duty Engine Standards and Heavy Duty Engine Standards when establishing the attainment dates for the eight hour ozone standard. Some areas may be able to attain the standard with the federal measures only. This approach would be cost effective by minimizing the need for additional control measures.

Issue: Transport

- The Environmental Protection Agency should ensure that downwind areas have attainment dates consistent with upwind areas which transport emissions. Downwind areas need sufficient time to attain the standard. If the downwind area has an earlier attainment date, the area could be at risk for noncompliance and ultimately, sanctions.

Issue: Transportation Conformity

- Conformity requirements for the one hour ozone standard should not apply, after the one hour standard is revoked.

- If the one hour and eight hour ozone standards are imposed concurrently, agencies conducting conformity should have the option of meeting one or the other, but not be required to meet both.

- The build/no build test for hydrocarbons may be more difficult to pass since the speed correction curves in MOBILE6 are "flatter" than the curves in MOBILE5a.

Issue: Congestion Mitigation Air Quality Funds (CMAQ) Implications

- When the Transportation Efficiency Act -21 is reauthorized (TEA-3), the Congestion Mitigation Air Quality Funds Program should be continued. The CMAQ Program is the principal source of funds for transportation control measures in air quality plans and conformity demonstrations.

- Under TEA-3, the CMAQ apportionment formula should continue to consider the population of nonattainment and maintenance areas in each state and their classification for ozone and carbon monoxide. The new CMAQ apportionment formula should take into account PM-10 nonattainment and maintenance areas. Additional weight should be given to areas that have been in violation of both the one hour and eight hour ozone standards. These areas are likely to be the major source of transportation-related ozone precursors.