



North Central Texas Council Of Governments

January 23 2006

Mr. Tom Lawshae  
Texas Commission on Environmental Quality  
P.O. Box 13087, Mail Code 206  
Austin, TX 78711-3087

Dear Mr. Lawshae:

This letter is in response to your January 19, 2006, email requesting final emission reductions for the control strategy catalog. Attachment 1 is a summary table of the control strategy catalog including comments made by the Texas Commission on Environmental Quality (TCEQ) as to which strategies were considered eligible for inclusion in the 8-Hour Ozone State Implementation Plan (SIP). For area, point and non-road mobile source strategies, the North Central Texas Council of Governments (NCTCOG) recommends using the nitrogen oxide (NOx) emission reduction estimates listed in the table. For strategies with a range of NOx reductions, NCTCOG suggests modeling the maximum value. We make this suggestion in order to determine a best-case scenario; and not necessarily because we believe these levels can be achieved.

To specifically address on-road mobile source strategies, NCTCOG recommends that TCEQ model NOx emission reduction estimates for 18 of the 20 strategies listed as SIP-eligible in the summary table. We do not recommend including Congestion (Value) Pricing due to insufficient data, nor do we recommend including Pay-As-You-Drive Insurance as implementation of the strategy as it is largely out of local control. For strategies with a range of NOx reductions, NCTCOG suggests modeling the maximum value for the same reason previously stated. Attachment 2 is a summary white paper for the Clean Fleet Vehicle Procurement Policy/Clean Fleet Program strategy which was mistakenly omitted in the information TCEQ has been referencing.

NCTCOG would like to stress that for on-road mobile source strategies, we recommend use of the NOx emission reduction estimates for photochemical modeling exercises only. We are unwilling to make formal commitments at this time for the following reasons:

1. There is the uncertainty of completing a 2009 8-Hour Ozone Attainment Demonstration Plan.
2. An approved 2009 Motor Vehicle Emissions Budget (MVEB) is unlikely.
3. A number of projects from previous SIPs may be needed for Transportation Control Measure (TCM) substitution.

4. A number of projects may be needed to maintain a reserve of Transportation Emissions Reduction Measures (TERMs) for future Transportation Conformity Analysis against MVEB's that over time may become outdated.
5. We do not yet have results for most of our local project funding initiatives. Many of the emission reductions have been based on a level of projects that could be funding in the Regional Transportation Council's (RTC) current funding initiatives. Until the RTC has made final approvals, there is no guarantee these emission reductions will be met.

NCTCOG would like to discuss formal commitments with TCEQ, as appropriate, when further information on SIP development and project funding is known. Please contact me at, [creese@nctcog.org](mailto:creese@nctcog.org) or (817)-608-2353, with any questions.

Sincerely,



Carrie Reese

CR:cg

Attachments

cc: 2005-2006 UPWP Element 3.02 Project File

Candy Garrett, Texas Commission on Environmental Quality  
Mike Eastland, North Central Texas Council of Governments  
Michael Morris, North Central Texas Council of Governments  
Chris Klaus, North Central Texas Council of Governments  
David Jodray, North Central Texas Council of Governments